CAL POLY POMONA
CAMPUS MASTER PLAN

Final Environmental Impact Report

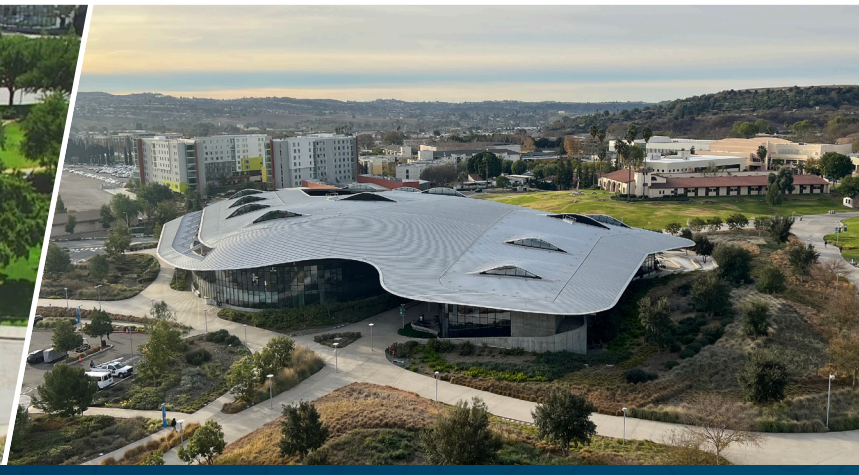
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Cal Poly Pomona

PREPARED FOR:
CAL POLY POMONA
3801 West Temple Avenue
Pomona, California
91768







DUDEK

Final Environmental Impact Report

Cal Poly Pomona Campus Master Plan

State Clearinghouse Number 2024040326

JULY 2025

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
3CE	Central Coast Community Energy
AB	Assembly Bill
A/C	air conditioning
ACC	Advanced Clean Cars
ACHP	Advisory Council on Historic Preservation
ACM	asbestos-containing material
ADA	Americans with Disabilities Act
ADT	average daily traffic
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
AFV	alternative fuel vehicle
AFY	acre-feet per year
AL	action level
AMBAG	Association of Monterey Bay Area Governments
amsl	above mean sea level
AMTB	Amah Mutsun Tribal Band
ANSI	American National Standards Institute
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
ARC	Agriculture, Natural Resources + Conservation
ASR	aquifer storage and recovery
AST	aboveground storage tank
bgs	below ground surface
BMP	best management practice
BREC	Biological Resources Existing Conditions Report
BSA	biological study area
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
CalARP	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California's Green Building Standards
Cal/OSHA	California Division of Occupational Safety and Health
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCE	Community Choice Energy

Acronym/Abbreviation	Definition
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	contaminant of emerging concern
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERS	California Environmental Reporting System
CESA	California Endangered Species Act
CFC	chlorofluorocarbon
CFC	California Fire Code
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CGP	Construction General Permit
CGS	California Geological Survey
CH_4	methane
CHP	California Highway Patrol
CHRIS	California Historical Resources Information System
CIWMB	California Integrated Waste Management Board
CLA	Classroom/Lab/Administration
CMU	concrete masonry unit
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRIER	Cultural Resources Inventory and Evaluation Report
CRPR	California Rare Plant Rank
CSA	County Service Area
CSU	the California State University
CTR	California Toxics Rule
CSCHRI	City of Santa Cruz Historic Resource Inventory
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
CWPP	Community Wildfire Protection Plan
cy	cubic yard
CZU	San Mateo – Santa Cruz Unit
dB	decibel
dBA	A-weighted decibel
DBH	diameter at breast height
DBP	Disinfectants and Disinfection Byproducts

Acronym/Abbreviation	Definition
DOC	California Department of Conservation
DOF	California Department of Finance
DDW	California Division of Drinking Water
DPM	diesel particulate matter
DSOD	Division of Safety of Dams
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
EH&S	California State University Environmental Health and Safety Department
EIA	U.S. Energy Information Administration
EIR	environmental impact report
EISA	Energy Independence and Security Act
EO	Executive Order
EOP	Emergency Operations Plan
EPA	U.S. Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
ESL	Environmental Screening Level
FAA	Federal Aviation Administration
FESA	federal Endangered Species Act
FMMP	Farmland Mapping and Monitoring Program
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FPPA	Farmland Protection Policy Act
FTE	full-time equivalent
FTES	full-time equivalent students
G	global
GAC	granular activated carbon
GHG	greenhouse gas
GHWTP	Graham Hill Water Treatment Plant
gpd	gallons per day
gpm	gallons per minute
GSA	groundwater sustainability agency
GSF	gross square feet
GSP	Groundwater Sustainability Plan
GWP	global warming potential
HAP	hazardous air pollutant
HCD	California Department of Housing and Community Development
HCFC	hydrochlorofluorocarbon
HCP	habitat conservation plan
HDD	horizontal directional drilling
HERO	Human and Ecological Risk Office
HFC	hydrofluorocarbon
HHRA	Human Health Risk Assessment
HiAP	Health in All Policies

Acronym/Abbreviation	Definition
HMA	Hillside Management Area
HMBP	hazardous materials business plan
HRA	health risk assessment
HSA	hydrologic subarea
HSC	California Health and Safety Code
HUC	hydrologic unit code
HVAC	heating, ventilation, and air conditioning
IFC	International Fire Code
in/sec	inches per second
IP	Invertebrate Paleontology
IPCC	Intergovernmental Panel on Climate Change
ISTEA	Intermodal Surface Transportation Efficiency Act
ITP	incidental take permit
IX	ion exchange
kBTU	thousand British thermal units
$KMnO_4$	potassium permanganate
kWh	kilowatt-hour
LACM	Natural History Museum of Los Angeles County
LACMIP	Los Angeles County Museum Invertebrate Paleontology
LACSD	Los Angeles County Sanitation District
LAFCO	Local Agency Formation Commission
LARWQCB	Los Angeles Regional Water Quality Control Board
LBP	lead-based paint
LCD	liquid crystal display
LCP	local coastal program
L_{dn}	day-night average noise level
LED	light-emitting diode
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent noise level
LEHCP	low-effect habitat conservation plan
LEV	low-emission vehicle
LID	low impact development
L_{max}	maximum noise level
L_{min}	minimum noise level
LOS	level of service
LOX	liquid oxygen
LRA	local responsibility area
LSA	Lake or Streambed Alteration
LT	Long-Term
LUST	leaking underground storage tank
L_x	noise level exceeded *x* percent of a specific period
MBARD	Monterey Bay Air Resources District
MCC	Motor Control Center

Acronym/Abbreviation	Definition
MCL	maximum contaminant level
MEIR	Maximum Exposed Individual Resident
MEIW	Maximum Exposed Individual Worker
MEP	maximum extent practicable
mg/cm^2	milligram per square centimeter
mgd	million gallons per day
mg/kg	milligrams per kilogram
MHJB	Mount Hermon June beetle
MLD	most likely descendant
MM	Mitigation Measure
MMRP	mitigation monitoring and reporting program
MMT	million metric tons
mph	miles per hour
MPO	Metropolitan Planning Organization
MRZ	Mineral Resource Zone
MT	metric ton
MTIP	Metropolitan Transportation Improvement Program
MTP/SCS	Metropolitan Transportation Plan/Sustainable Communities Strategy
Mw	moment magnitude
MW	megawatt
MWD	Metropolitan Water District of Southern California
MWh	megawatt-hour
mya	million years ago
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan(ning)
NESHAP	National Emission Standards for Hazardous Air Pollutants
NF_3	nitrogen trifluoride
NHMLA	Natural History Museum of Los Angeles County
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NMFS	National Marine Fisheries Service
NO_2	nitrogen dioxide
NOI	Notice of Intent
NOP	Notice of Preparation
NO_x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NTU	nephelometric turbidity unit
NWIC	Northwest Information Center

Acronym/Abbreviation	Definition
O_3	ozone
O&M	operations and maintenance
OEHHA	Office of Environmental Health Hazard Assessment
OMHCP	Operations and Maintenance Habitat Conservation Plan
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PCE	passenger car equivalence
PCE	primary constituent element
PDF	Project Design Feature
PEIR	program environmental impact report
PFAS	per- and polyfluoroalkyl substances
PFC	perfluorocarbon
$PM_{2.5}$	fine particulate matter
PM_{10}	coarse particulate matter
ppm	parts per million
PPV	peak particle velocity
PRC	California Public Resources Code
PRIMP	Paleontological Resources Impact Mitigation Program
PV	photovoltaic
PWRP	Pomona Water Reclamation Plant
RCRA	Resource Conservation and Recovery Act
RFS	Renewable Fuel Standard
RHNA	Regional Housing Needs Allocation
RMP	Risk Management Plan
RMS	root mean square
ROG	reactive organic gas
RPS	Renewables Portfolio Standard
RRF	Resource Recovery Facility
RSL	regional screening level
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
S	state
SB	Senate Bill
SCADA	Supervisory Control and Data Acquisition
SCAG	Southern California Association of Governments
SCP	Standard Construction Practice
SCS	Sustainable Communities Strategy
SF_6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SHPO	State Historic Preservation Officer
SLF	Sacred Lands File
SLM	sound level meter
SMP	soil management plan

Acronym/Abbreviation	Definition
SO_2	sulfur dioxide
SOP	standard operating procedure
SOWF Policy	Securing Our Water Future Policy
SO_x	sulfur oxides
SPCC	spill prevention, control, and countermeasure
SR	State Route
SRA	state responsibility area
SRRE	Source Reduction and Recycling Element
STC	Sound Transmission Class
STLC	soluble threshold limit concentration
SUAM	State University Administrative Manual
SVP	Society of Vertebrate Paleontology
SWMP	stormwater management plan
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCLP	toxicity characteristic leaching procedure
TMDL	total maximum daily load
TNM	Highway Traffic Noise Model
TOC	total organic carbon
TPH-g	total petroleum hydrocarbons as gasoline
TTLC	total threshold limit concentration
TVMWD	Three Valleys Municipal Water District
UC	University of California
UCMP	University of California Museum of Paleontology
UF	ultrafiltration membrane filtration
USACE	U.S. Army Corps of Engineers
USC	United States Code
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
UV	ultraviolet
UWMP	Urban Water Management Plan
VAC	Volts Alternating Current
VdB	vibration decibel
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
VOIP	Voice Over Internet Protocol
VP	Vertebrate Paleontology
WDR	Waste Discharge Requirement
WSA	water supply assessment
WSAC	Water Supply Advisory Committee

Acronym/Abbreviation	Definition
WRP	Water Reclamation Plant
WUI	wildland–urban interface
WVWD	Walnut Valley Water District
WWTF	wastewater treatment facility
ZEV	zero-emission vehicle

Preface to the Final EIR

In compliance with California Environmental Quality Act (CEQA) Guidelines Section 15132, this document serves as the Final Environmental Impact Report (Final EIR) for the proposed California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan") (State Clearinghouse [SCH] No. 2024040326). This Final EIR has been prepared under the direction of the California State University (CSU) Board of Trustees, acting as lead agency, in accordance with the requirements of CEQA ([PRC Section 21000 et seq.) and the State CEQA Guidelines (14 CCR 15000 et seq.). In accordance with Sections 15087 and 15105 of the State CEQA Guidelines, the Draft EIR was circulated for public review and comment for a period of 45 days, from May 7, 2025, through June 20, 2025.

State CEQA Guidelines Section 15132 requires that the Final EIR consist of the following components:

1. The Draft EIR or a revision of the Draft EIR
2. Comments and recommendations received on the Draft EIR either verbatim or in summary
3. A list of persons, organizations, and public agencies commenting on the Draft EIR
4. The responses of the lead agency to significant environmental points raised in the review and consultation process
5. Any other information added by the lead agency

This Final EIR contains the public comments received on the Draft EIR for the proposed Master Plan, as well as all written responses to those comments. A list of the persons, organizations, and public agencies that commented on the Draft EIR is provided in the "Responses to Comments" chapter of this document. In addition, the "Responses to Comments" chapter documents the revisions to the Draft EIR made in response to comments and community input received during the public comment period. Those revisions have been incorporated into this clean version of the Final EIR.

Introduction

This preface, which serves as an introduction to the Final EIR, provides a summary of the public review process, an overview of the Final EIR contents, and a summary of the changes made to the Draft EIR text. Some of these changes were made in response to comments received during the public comment period. Other changes were made to provide corrections or clarification.

Public Review Process

The Board of Trustees, acting as lead agency, prepared the Draft EIR to inform decision makers and the public of the potential significant environmental effects associated with implementing the proposed Master Plan. The Draft EIR was circulated for public review and comment for a period of 45 days, from May 7, 2025, through June 20, 2025. A public notice of availability of the Draft EIR was published in a newspaper of general circulation and mailed to all organizations and individuals previously requesting notice. Cal Poly Pomona provided copies of the complete Draft EIR with appendices to the State Clearinghouse, which, in turn, distributed the Draft EIR to all interested state agencies for review and comment. The Draft EIR and associated appendices were made available for review online at https://www.cpp.edu/masterplan. In addition, a virtual public meeting was held on May 13, 2025. Interested

persons and organizations had the opportunity to submit their written comments on the Draft EIR during the public review period. Comment letters received on the Draft EIR, reproduced in their entirety, and responses to those comments are provided in the "Responses to Comments" chapter of the Final EIR, which follows this preface.

Section 15088(c) of the State CEQA Guidelines specifies that the focus of the responses to comments shall be on the disposition of significant environmental issues. Responses are not required for comments regarding the merits of the project or on issues not related to potential physical environmental impacts or the Draft EIR's analysis of such impacts. Comments on the merits of the project or other comments that do not raise environmental issues are nevertheless included in the record for consideration as part of the project approval process. The responses address environmental issues and indicate where issues raised do not pertain to environmental impacts or the analysis or address the merits of the project. In the latter instance, no further response is provided.

Although some of the comments have resulted in changes to the text of the Draft EIR, none of the changes constitute "significant new information," which would require the Draft EIR's recirculation. "Significant new information" is defined in Section 15088.5(a) of the State CEQA Guidelines as follows:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

None of these circumstances has arisen from comments on the Draft EIR; therefore, recirculation is not required.

As required by CEQA Section 21092.5 and State CEQA Guidelines Section 15088(b), at least 10 days before consideration of the Final EIR for certification, Cal Poly Pomona provided a proposed written response (hard or electronic copy) to each public agency that submitted written comments on the Draft EIR.

Overview of the Final EIR

This Final EIR consists of the Draft EIR with a new chapter, "Responses to Comments," which is inserted before the Executive Summary and includes the following components:

- List of persons, organizations, and public agencies commenting on the Draft EIR
- Comments received on the Draft EIR, verbatim
- Responses from the lead agency to significant environmental points raised in comments received on the Draft EIR
- Revisions to the Draft EIR made in response to comments received during the public comment period

Revisions to the Draft EIR

The following list summarizes the substantive changes made to the EIR since public review. All changes are incorporated into this clean version of the Final EIR and are identified in the "Responses to Comments" chapter. Where necessary, supporting materials that supplement these revisions have been included in updated appendices, as noted below.

Chapter 1, Executive Summary

- MM-BIO-1 (Project-Specific Biological Assessments) was updated to correct a typo and to clarify that the Crotch's Bumble Bee overwintering season extends from November through January.

Chapter 3, Project Description

- Figures 3-2A through 3-2C (Existing Campus Master Plan) were revised to correct figure errors. In Figure 3-2A, the Food Production Container (Building 214) was added into the legend. In Figure 3-2B (Existing Campus Master Plan), two hexagons with the numbers 1 and 2 were removed as they reflect previously proposed map revisions and were left on the map in error. In Figure 3-2C, Building 214 was added to the map.
- Figures 3-4A through 3-4C (Proposed Campus Master Plan) were revised to correct figure errors. In Figure 3-4A, Building 214 and the proposed Recreational Fields and Support Facilities (Building 122) were added into the legend. In Figure 3-4B, the map was updated to reflect the correct proposed location of the ROTC facilities (Buildings 13B through 13D) per the Master Plan Update and Draft EIR. The map in the Draft EIR showed the ROTC facilities at their current location, not the new proposed location. Figure 3-4B was also updated to provide the location of Building 122. In Figure 3-4C, Building 214 was added to the map.
- Section 3.2.1, Location and Setting, was updated to provide background information on Spadra Landfill.
- Section 3.7.6, Utility Infrastructure Improvements, was revised to add clarification that none of the proposed improvements are anticipated to result in any changes to the executed 1982 agreement or 2012 amendment or Memorandum of Understanding (MOU), or to Cal Poly Pomona's obligation and intent to continue the provision of reclaimed water for irrigation purposes to Forest Lawn-Covina Hills.
- Section 3.8, Project Design Features and Continuing Best Practices, Project Design Feature PDF-TRA-1 was amended to include Forest Lawn-Covina Hills, which operates the memorial park adjacent to Cal Poly Pomona to the northwest, among the agencies and entities to be notified if and when individual Master Plan construction projects require significant work within existing roadways and necessitate a construction traffic control plan, to ensure impacts to Forest Lawn-Covina Hills memorial park operations, including funeral processions, are avoided or minimized to the maximum extent feasible.
- Table 3-3, Proposed Master Plan and Related Approvals, was updated to include the State Water Resources Control Board, Division of Drinking Water as a responsible agency, with approval of a domestic water supply permit amendment for the addition of a new reservoir, changes to the status of an existing source, and for changes in treatment.

Section 4.3, Air Quality

- Several statements were updated to correct minor typos.

Section 4.4, Biological Resources

- MM-BIO-1 (Project-Specific Biological Assessments) was updated to correct a typo and to clarify that the Crotch's Bumble Bee overwintering season extends from November through January.

Section 4.6, Cultural Resources – Historical Resources

- Table 4.6-10, Individually Eligible Properties, was updated to clarify that none of the properties qualify under the California Historical Landmark Criteria.
- Pages 37, 38, and 39 were placed out of order and have been re-arranged in the correct order.

Section 4.19, Utilities and Service Systems

- Section 4.19.1.1, Environmental Setting, Water, was updated to include details of a 1982 agreement, 2012 amendment to the agreement, and 2012 MOU between Cal Poly Pomona and Forest Lawn-Covina Hills that set forth the terms under which Cal Poly Pomona shares its City-provided reclaimed water with Forest Lawn-Covina Hills for their memorial park irrigation purposes. This section was also amended to require Cal Poly Pomona to consult with Forest Lawn if and when proposed potable and, potentially, reclaimed water system improvements are undertaken. Finally, the section was amended to clarify that Master Plan projects related to Cal Poly Pomona's reclaimed water reservoir, Well No. 2, and reclaimed water pipelines would not result in any changes to the executed 1982 agreement or 2012 amendment and MOU, nor would they affect Cal Poly's obligation and intent to continue the provision of reclaimed water for irrigation purposes to Forest Lawn-Covina Hills in future.
- Section 4.19.1.2, Environmental Setting, Wastewater, was updated to include updated trunk sewer conveyed peak flows and treatment facility average flows.
- Section 4.19.4.1, Project Impacts, Impact 4.19-1, was updated to include updated treatment facility average flows and the anticipated increase in average wastewater flow associated with the proposed Master Plan.
- Section 4.19.4.1, Project Impacts, Impact 4.19-3, was updated to include updated treatment facility average flows and the anticipated increase in average wastewater flow associated with the proposed Master Plan.
- Section 4.19.4.2, Cumulative Impacts, Impact 4.19-6, was updated to include updated treatment facility average flows.

Appendix D-2

- Table 5-6, Individually Eligible Properties, was updated to clarify that none of the properties qualify under the California Historical Landmark Criteria.

Appendix G

- Section 5.4, Water Resources, Recycled Water, was updated to include details of an executed 1982 agreement and 2023 amendment and MOU between Cal Poly Pomona and Forest Lawn-Covina Hills to share Cal Poly Pomona's reclaimed water with Forest Lawn-Covina Hills for their memorial park irrigation purposes.

Appendix H

- Reproduced and bracketed comment letters submitted on the Draft EIR.

Project Decision Process

This Final EIR will be considered by the Board of Trustees prior to deciding whether to approve the proposed Master Plan. If the Board of Trustees decide to approve the proposed Master Plan, they, as required by State CEQA Guidelines Section 15090, must first certify that the Final EIR was completed in compliance with CEQA's requirements, was reviewed and considered by the Board of Trustees, and reflects its independent judgment and analysis. The Board of Trustees are then required to adopt findings of fact on the disposition of each significant environmental impact, as required by State CEQA Guidelines Section 15091. If significant and unavoidable impacts (those that cannot feasibly be mitigated to a less than significant level) would result from implementing the proposed Master Plan, the proposed Master Plan can still be approved, but the Board of Trustees must issue a "statement of overriding considerations" explaining in writing the specific economic, social, or other considerations that they believe, based on substantial evidence, make those significant effects acceptable (PRC Section 21002; 14 CCR 15093). A mitigation monitoring and reporting program, which is required by State CEQA Guidelines Section 15091(d) must be adopted by the Board of Trustees in conjunction with any project approval.

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Responses to Comments

This chapter of the Final Environmental Impact Report (Final EIR) contains the comment letters received during the public review period for the Draft EIR, which concluded on June 20, 2025. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared to address comments on significant environmental issues received from reviewers of the Draft EIR.

1 Commenters on the Draft EIR

Table 1 lists the comment letters received and the alphanumerical designation, author, and date of each letter. Comment letters are numbered in the order in which they were received by Cal Poly Pomona.

Table 1. List of Commenters

Letter Number	Agency/Organization/Commenter	Date
State		
S1	State Water Resources Control Board Lori Schmitz, Environmental Scientist, Division of Financial Assistance	June 18, 2025
Local		
L1	SoCalGas Will Liao, Inland Region Planning Supervisor	June 3, 2025
L2	Los Angeles County Sanitation Districts Robert C. Ferrante, Chief Engineer and General Manager Patricia Horsley, Environmental Planner	June 18, 2025
Organization		
O1	Cox, Castle & Nicholson LLP on behalf of Forest Lawn Memorial-Park Association David P. Waite Lisa M. Patricio	June 20, 2025

2 Comments and Responses on the Draft EIR

The written comments received on the Draft EIR and the responses to those comments are presented below. Each comment is reproduced in its entirety and is followed by the response. If the comments shown below contain spelling, grammatical, and other errors, they were present in the original comment sources and have been retained. Comment letters in their original form are included in Appendix H; individual comments are bracketed and numbered and correspond to the comments presented in this section. In cases where a response to a comment involves a change to the Draft EIR, additions are shown in <u>underline</u> and removed text is shown in ~~strikeout~~.

2.1 State

Response to Comment Letter S1

State Water Resources Control Board
Lori Schmitz, Environmental Scientist, Division of Financial Assistance
June 18, 2025

Comment S1-1

Thank you for the opportunity to review the EIR for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (DDW), issues domestic water supply permits under the Safe Drinking Water Act. This Project falls under DDW's Angeles District jurisdiction. The Angeles District issues permit amendments according to the Title 22 California Code of Regulations (Cal. Code Regs) chapter 16. Public water systems need a permit amendment for modification of the water supply including new sources, new reservoirs with 100,000-gallon capacity or greater, service area expansions of twenty percent or more, and treatment design capacity or process changes as per Cal. Code Regs. § 64556.

Response S1-1

The comment describes the regulatory responsibilities of the State Water Resources Control Board and their jurisdiction over new or modified water system components identified in the proposed Master Plan. The comment is informational in nature and does not address the adequacy or conclusions of the Draft EIR; therefore, no further response is required.

Comment S1-2

The State Water Board, DDW has the following technical recommendations regarding the Project planning:

- The Water System should reach out to the Angeles District [(818) 551-2004 and/or by email at DWPDist22@waterboards.ca.gov], early in the Project design phase to ensure compliance with all necessary drinking water permit regulations for the proposed facilities.

Response S1-2

The comment requests that Cal Poly Pomona reach out to the State Water Resources Control Board, Angeles District, early in the Project Design phase to ensure compliance with all necessary drinking water permit regulations. At this time, Master Plan projects involving a modification of the water supply including new sources, new reservoirs with 100,000-gallon capacity or greater, service area expansions of 20% or more, and treatment design capacity or process changes are not in the design phase. However, once the design phase has begun, Cal Poly Pomona will coordinate with State Water Resources Control Board, Angeles District to ensure compliance with all necessary drinking water permit regulations.

Comment S1-3

- Well 2 meets the requirements of an extremely impaired source under DDW's Process Memo 97-005-R2020 (Memo). The Water System will need to submit sequential technical background and strategy information for review and approval by DDW, as directed in the Memo.
- If the complete technical background and strategy information are approved by DDW, the Water System should submit project design drawings and as-built plans to the Angeles District for all proposed modified or new sources (Cal. Code of Regs. § 64560), treatment (Cal Code of Regs § 64658[a]), and storage infrastructure (Cal. Code of Regs. § 64585[b]) prior to construction and/or approval.

Response S1-3

The comment states that Well 2 on the Cal Poly Pomona campus is considered to be an extremely impaired water source and that sequential technical background and strategy information must be submitted to the DDW for review and approval. If the technical background and strategy information are approved by DDW, then project design drawings and as-built plans must be submitted to the Angeles District prior to construction. At this time, the Well 2 improvements, and the Well Water and Water Treatment Plant Expansion project, details and plans are not yet known. Once these details are determined, Cal Poly Pomona will submit the sequential technical background and strategy information to the DDW, and project design drawings and as-built plans will be submitted to the Angeles District prior to construction.

Comment S1-4

The State Water Board, DDW, as a responsible agency under the California Environmental Quality Act (CEQA), has the following comments on the EIR:

- The Project will expand building space and provide for up to 30,000 full time-equivalent students on the campus through 2040 (PDF page 25). The Project will also construct a new 570,000-gallon reservoir to replace the existing lower reservoir and install a Well 2 volatile organic compound wellhead treatment system, including a reverse osmosis water treatment train (PDF page 124). The well and treatment system will be able to produce an additional 300,000 gallons per day of domestic water (PDF page 124). In Table 3-3 Proposed Master Plan and Related Approvals (PDF page 131), please add the State Water Resources Control Board, Division of Drinking Water as an applicable and responsible agency and add approval of a domestic water supply permit amendment for the addition of a new reservoir, changes to the status of an existing source, and for changes in treatment [Cal. Code Regs. § 64556].

Response S1-4

The comment summarizes portions of the Draft EIR, Chapter 3, Project Description, and requests that the Project Description, Table 3-3, Proposed Master Plan and Related Approvals, be revised to include the State Water Resources Control Board, Division of Drinking Water as an applicable and responsible agency.

Table 3-3, Proposed Master Plan and Related Approvals, (page 3-45) of the Draft EIR has been revised as follows to include the State Water Resources Control Board as an applicable and responsible agency for the following approvals:

Chapter 3, Project Description, Table 3-3, page 3-45

State Water Resources Control Board, Division of Drinking Water	Approval of a domestic water supply permit amendment for the addition of a new reservoir, changes to the status of an existing source, and for changes in treatment	✓

The above-listed change does not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5, as it does not result in a new or substantially more significant impact. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration by the Board of Trustees for certification.

Comment S1-5

When the CEQA process is completed, please forward the following items with the permit application to the State Water Board, DDW Angeles District at DWPDIST22@waterboards.ca.gov:

- The EIR and Mitigation Monitoring and Reporting Plan (MMRP);
- The Resolution or Board Minutes certifying the EIR and adopting the MMRP; and
- The date stamped Notice of Determination filed at the County Clerk's Office and the State Clearinghouse.

Please contact Lori Schmitz of the State Water Board at (916) 449-5285 or Lori.Schmitz@waterboards.ca.gov, for questions regarding this comment letter.

Response S1-5

The comment requests that the MMRP, Resolution or Board Minutes certifying the EIR and adopting the MMRP, and the Notice of Determination be sent to the DDW Angeles District once the CEQA process is completed. The comment also provides State Water Board contact information in case there are questions on the comment letter. Cal Poly Pomona will send the requested documents to the DDW Angeles District once the CEQA process is completed.

2.2 Local

Response to Comment Letter L1

SoCalGas
Will Liao, Inland Region Planning Supervisor
June 3, 2025

Comment L1-1

My name is Will Liao. I am the Inland Region Planning Supervisor for SoCalGas.

I received a letter from Cal Poly Pomona (CPP) regarding the Notice of Availability of a Draft Environmental Impact Report - California State Polytechnic University, Pomona Campus Master Plan.

SoCalGas has several existing facilities in and around the CPP Campus. Please help us ensure everyone's safety and contact 811/USA prior to any excavation and/or demolition activities so we can get out to Locate & Mark out our facilities. Excavations within 10 ft of our High-Pressure facilities will require a SoCalGas High-Pressure Standby on site.

Response L1-1

The comment provides an introduction and notes that SoCalGas received the Draft EIR Notice of Availability (NOA). The comment requests that Cal Poly Pomona contact 811/USA prior to any excavation and/or demolition activities because there are several SoCalGas facilities throughout the campus. Additionally, any excavations within 10 feet of a SoCalGas High-Pressure facility will require a SoCalGas High-Pressure Standby on site. Cal Poly Pomona will contact 811/USA prior to any excavation and/or demolition activities and understands that a SoCalGas High-Pressure Standby will be required on site where any excavations within 10 feet of a SoCalGas High-Pressure facility occur.

Comment L1-2

Prior to any improvements, demolition, grading, and other construction activities, please send us designs/plans as soon as practicable for us to review for potential conflicts with our facilities. Alterations/Relocations of Medium-Pressure facilities can take around 3 to 6 months to plan and execute, and longer for High-Pressure facilities. The sooner we have 95%+ plans for reviews, the better the chance for a successful outcome.

Response L1-2

The comment requests that Cal Poly Pomona provide designs and plans as soon as possible prior to any improvements, demolition, grading, and other construction activities because alterations and relocations of Medium-Pressure facilities can take around 3 to 6 months to plan and execute and can take longer for High-Pressure facilities. At this time, most Master Plan projects are not yet in the design phase. However, once the design phase has begun, Cal Poly Pomona will coordinate with SoCalGas and provide designs and plans as soon as possible.

Comment L1-3

If CPP will need new gas services, please contact our Builder Services group to begin the application process as soon as practicable, at: Builder Services |SoCalGas

I have copied my colleagues from the Orange Coast Region for their awareness.

Please let me know if you have any questions.

Response L1-3

The comment provides contact information for the Builder Services group in case new gas services are required and notes that colleagues from the Orange Coast Region were included in the email correspondence. The comment does not address the adequacy or conclusions of the Draft EIR; therefore, no further response is required.

Response to Comment Letter L2

Los Angeles County Sanitation Districts
Robert C. Ferrante, Chief Engineer and General Manager
Patricia Horsley, Environmental Planner
June 18, 2025

Comment L2-1

The Los Angeles County Sanitation Districts (Districts) received a Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR) for the subject project located in the City of Pomona on June 4, 2025. Previous comments submitted by the Districts in correspondence dated May 7, 2024 (copy enclosed), still apply to the subject project with the following comments:

Response L2-1

The comment notes that the Los Angeles County Sanitation Districts (Districts) received the Draft EIR Notice of Availability (NOA). The comment also notes that the previous comments submitted by the Districts still apply and in addition, new comments are being provided. This comment is an introductory comment and does not address the adequacy or conclusions of the Draft EIR. Therefore, no further response is required. The specific comments raised following this introduction are listed separately, along with Cal Poly Pomona's individual responses.

Comment L2-2

1. A portion of the project area is outside the jurisdictional boundaries of the Districts and will require annexation into District No. 21 before sewerage service can be provided to the proposed development. For a copy of the Districts' Annexation Information and Processing Fee sheets, go to Annexation Program | Los Angeles County Sanitation Districts. For more specific information regarding the annexation procedure and fees, please contact Ms. Shirly Wang at (562) 908-4288, extension 2708.

Response L2-2

The comment notes that a portion of the proposed Master Plan area is outside the jurisdictional boundaries of the Districts and will require annexation into District No. 21 before sewerage service can be provided to the proposed development. Information regarding the annexation process is provided. Cal Poly Pomona understands that an annexation may be required for the applicable Master Plan areas located outside the jurisdictional boundaries of the Districts. Cal Poly Pomona will proceed with the annexation process, if required, when the relevant/effected Master Plan projects undergo final planning and design processes.

Comment L2-3

1. The Districts' 42-inch diameter Joint Outfall A-1A District 21 Interceptor Trunk Sewer has a capacity of 38.2 million gallons per day (mgd) and conveyed a peak flow of 13.6 mgd when last measured in 2022. The Districts' 27-inch diameter District 21 Outfall Trunk Sewer has a capacity of 19.3 mgd and conveyed a peak flow of 1.5 mgd when last measured in 2022.
2. A.K. Warren Water Resource Facility currently processes an average flow of 246.0 mgd. The San Jose Creek Water Reclamation Plant currently processes an average recycled flow of 62.6 mgd.

3. The expected increase in average wastewater flow from the project, described in the DEIR as 8,085 students, is 161,700 gallons per day.

Response L2-3

The comment provides updated conveyed peak flow of trunk sewers and average flows of the treatment plants discussed in the Draft EIR. The comment also provides a corrected estimate of the anticipated average wastewater flow from the proposed Master Plan. Section 4.19, Utilities and Service Systems, of the Draft EIR has been revised to incorporate this updated information, as follows:

Section 4.19.1.2, Environmental Setting, Wastewater (pages 4.19-2 and 4.19-3)

The Cal Poly Pomona campus has a gravity flow sanitary sewer system that connects to the City of Pomona's municipal system near Temple Avenue and Valley Boulevard. The wastewater from the reverse osmosis plant flows in a gravity pipeline all the way to the LACSD wastewater main located in Spadra Farm near the North Flood Control Channel. The City's wastewater collection system includes about 317 miles of gravity sewers, four pump stations maintained by the LACSD, 1.4 miles of force mains, over 6,000 manholes, and two siphons (City of Pomona 2024).

Wastewater from the local sewer line is discharged to either or both of LACSD's Joint Outfall A-1A District 21 Interceptor Trunk Sewer, located in a right of way along the west side of Union Pacific Railroad south of Valley Boulevard, or the District 21 Outfall Trunk Sewer, located in a right of way along the west side of San Jose Creek south of State Street. LACSD's 42-inch diameter Joint Outfall A-1A District 21 Interceptor Trunk Sewer has a capacity of 38.2 million gallons per day (mgd) and conveyed a peak flow of ~~23.3~~13.6 mgd when last measured in ~~2014~~2022. LACSD's 27-inch diameter District 21 Outfall Trunk Sewer has a capacity of 19.3 mgd and conveyed a peak flow of ~~1.4~~1.5 mgd when last measured in ~~2014~~2022 (Appendix A and Appendix H).

Wastewater generated by Cal Poly Pomona is treated at the A.K. Warren Water Resource Facility (formerly Joint Water Pollution Control Plant) located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of ~~237~~246.0 mgd, or the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average recycled flow of ~~64.1~~62.6 mgd. All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the A.K. Warren Water Resource Facility (Appendix A and Appendix H).

Section 4.19.4.1, Utilities and Service Systems, Impact Analysis, Project Impacts, Impact 4.19-1 (page 4.19-13)

Wastewater

The wastewater flow originating from the proposed Master Plan development would continue to operate, as described in Section 4.19.1.2.

The wastewater generated by the proposed Master Plan would be treated at the A.K. Warren Water Resource Facility (formerly Joint Water Pollution Control Plant) located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of ~~237~~246.0 mgd, or the San Jose Creek

Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average recycled flow of ~~64.1~~62.6 mgd (Appendix A and Appendix H). The expected increase in average wastewater flow from the proposed Master Plan, as provided by LACSD is ~~200,000~~161,700 gpd for an ~~increase in 10,000 students (headcount). As shown in Table 3.1, the~~ anticipated net increase in student headcount ~~would be~~ of 8,085. ~~,which is less than the 10,000 student estimate provided by LACSD. Therefore, the 200,000 gdp wastewater generation increase is a conservative estimate.~~ Assuming the proposed Master Plan generates ~~200,000~~161,700 gpd, this would fall well within the capacities listed above. As such, no new or expanded wastewater treatment facilities would be required to accommodate the proposed Master Plan and the impacts would be **less than significant**.

Section 4.19.4.1, Utilities and Service Systems, Impact Analysis, Project Impacts, Impact 4.19-3 (page 4.19-21)

Program-Level Analysis for Master Plan

As discussed previously, the wastewater generated by the proposed Master Plan would be treated at the A.K. Warren Water Resource Facility (formerly Joint Water Pollution Control Plant) located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of ~~237~~246.0 mgd, or the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average recycled flow of ~~64.1~~62.6 mgd. The expected increase in average wastewater flow from the proposed Master Plan, as provided by LACSD, is ~~200,000~~161,700 gpd, falling well within the capacities listed above. As for the water demand estimate for the proposed Master Plan presented in Impact 4.19-2, this wastewater estimate is also conservative as it does not necessarily account for compliance with the CSU Sustainability Policy related to water conservation, which would also serve to reduce wastewater generation from the campus. As such, impacts of the proposed Master Plan related to wastewater treatment capacity would be **less than significant.**

Section 4.19.4.2, Utilities and Service Systems, Impact Analysis, Cumulative Impacts, Impact 4.19-6 (page 4.19-24)

Wastewater

The proposed Master Plan, along with other cumulative projects occurring in the area, would be required to comply with applicable federal, state, and local regulations applicable to the construction of any new or expanded wastewater facilities. As previously mentioned, wastewater generated by the proposed Master Plan as well as the cumulative projects would be treated at the A.K. Warren Water Resource Facility (formerly Joint Water Pollution Control Plant) located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of ~~237~~246.0 mgd, or the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average recycled flow of ~~64.1~~62.6 mgd. Therefore, there is sufficient capacities at the regional wastewater treatment facilities and the proposed Master Plan does not include any components or activities that would contribute to cumulative wastewater or wastewater treatment impacts and thus, cumulative impacts regarding wastewater would be **less than significant**.

The above-listed changes do not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5, as they do not result in a new or substantially more significant impact. As such, recirculation of

the Draft EIR is not required under CEQA standards and is not required prior to consideration by the Board of Trustees for certification.

Comment L2-4

1. Districts receive, treat and dispose of the wastewater generated at the Cal Poly Pomona campus pursuant to an Agreement dated August 1, 1958 (CSD C#1201) that expired in 2008. The Districts invoice Cal Poly Pomona an annual service charge for the wastewater disposed. Please contact Mr. Navnit Padival, Supervisor in the Districts' Financial Management Department, at (562) 908-4288, ext. 2438 or npadival@lacsd.org to discuss the need to update and renew the Agreement.

Response L2-4

The comment provides information regarding the existing agreement between Cal Poly Pomona and the Districts. The comment provides contact information for the Financial Management Department to be contacted to renew the agreement. Cal Poly Pomona will contact the Districts' Financial Management Department to discuss the need to update and renew the agreement. No changes to the Draft EIR are required in response to this comment.

Comment L2-5

1. Please note the proposed project is located adjacent to the Spadra Landfill, a closed sanitary landfill property owned by Cal Poly Pomona and maintained by the Districts pursuant to an agreement between the parties.

Response L2-5

The comment provides information regarding the Spadra Landfill. Chapter 3, Project Description, of the Draft EIR has been revised to incorporate this information, as follows:

Chapter 3, Project Description, Section 3.2, Project Location and Setting (page 3-2)

Beyond the main campus, Cal Poly Pomona owns property south of West Temple Avenue: the approximately 300-acre Lanterman Development Center (formerly the State of California Lanterman Center for the Developmentally Disabled); the 125-acre Spadra Farm, a one-time agricultural portion of the Lanterman Development Center and current site of the Cal Poly Pomona's teaching farm; and additional agricultural land, which formerly operated as the Spadra Landfill. <u>The Spadra Landfill is a closed sanitary landfill property owned by Cal Poly Pomona and maintained by the Los Angeles County Sanitation Districts pursuant to an agreement between the parties.</u> No new development is proposed for the Lanterman Development Center, Spadra Farm, or Spadra Landfill under this proposed Master Plan, and they are not further discussed in this document.

The above-listed change does not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5, as it does not result in a new or substantially more significant impact. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration by the Board of Trustees for certification.

Comment L2-6

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

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2742, or phorsley@lacsd.org.

Response L2-6

The comment notes that there are no further comments on the Draft EIR and provides contact information if there are further questions. The comment does not address the adequacy or conclusions of the Draft EIR; therefore, no further response is required.

Comment L2-7

NOP Response to California State Polytechnic University, Pomona Campus Master Plan Update

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation (NOP) of a Environmental Impact Report (EIR) for the subject project located in the City of Pomona on April 10, 2024. We offer the following comments regarding sewerage service:

1. A portion of the project area is outside the jurisdictional boundaries of the Districts and will require annexation into District No. 21 before sewerage service can be provided to the proposed development. For a copy of the Districts' Annexation Information and Processing Fee sheets, go to Annexation Program | Los Angeles County Sanitation Districts (lacsd.org). For more specific information regarding the annexation procedure and fees, please contact Ms. Shirly Wang at (562) 908-4288, extension 2708.
2. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to either or both the Districts' Joint Outfall A-1A District 21 Interceptor Trunk Sewer, located in a right of way along the west side of Union Pacific Railraod south of Valley Boulevard, or the District 21 Outfall Trunk Sewer, located in a right of way along the west side of San Jose Creek south of State Street. The Districts' 42-inch diameter Joint Outfall A-1A District 21 Interceptor Trunk Sewer has a capacity of 38.2 million gallons per day (mgd) and conveyed a peak flow of 23.3 mgd when last measured in 2014. The Districts' 27-inch diameter District 21 Outfall Trunk Sewer has a capacity of 19.3 mgd and conveyed a peak flow of 1.4 mgd when last measured in 2014.
3. The wastewater generated by the proposed project will be treated at the A.K. Warren Water Resource Facility (formerly Joint Water Pollution Control Plant) located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 237.0 mgd, or the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average recycled flow of 64.1 mgd. All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the A.K. Warren Water Resource Facility.
4. The expected increase in average wastewater flow from the project, described in the NOP as 10,000 students, is 200,000 gallons per day. For a copy of the District's average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits and select Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.
5. The Districts receive, treat and dispose of the wastewater generated at the Cal Poly Pomona campus pursuant to an Agreement dated August 1, 1958 (CSD C#1201) that expired in 2008. The Districts invoice

Cal Poly Pomona an annual service charge for the wastewater disposed. Please contact Mr. Navnit Padival, Supervisor in the Districts' Financial Management Department, at (562) 908-4288, ext. 2438 or npadival@lacsd.org to discuss the need to update and renew the Agreement.

6. Please note the proposed project is located adjacent to the Spadra Landfill, a closed sanitary landfill property owned by Cal Poly Pomona and maintained by the Districts pursuant to an agreement between the parties.
7. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before future individual development is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family Home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, please contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.
8. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

   If you have any questions, please contact the undersigned at (562) 908-4288, extension 2742, or phorsley@lacsd.org.

Response L2-7

The comment provides the Notice of Preparation (NOP) comment letter submitted by the Districts. This NOP comment letter was reviewed by Cal Poly Pomona and was incorporated into the Draft EIR analysis, where relevant. This comment letter is also provided in Appendix A of the EIR. The comments included in this NOP comment letter are the same or similar comments to the comments submitted by the Districts on the Draft EIR, which were responded to above in Responses L2-2 through L2-6.

2.3 Organization

Response to Comment Letter O1

Cox, Castle & Nicholson LLP
David P. Waite
Lisa M. Patricio
June 20, 2025

Comment O1-1

Thank you for the opportunity to review the Draft Environmental Impact Report ("EIR") for Cal Poly Pomona's 2040 Campus Master Plan Update. On behalf of Forest Lawn Memorial-Park Association ("Forest Lawn"), we submit the following comments.

Forest Lawn

Forest Lawn is a major operator of cemeteries and mortuaries, providing important interment and related services for hundreds of thousands of California families. Forest Lawn operates a cemetery located adjacent to Cal Poly Pomona's main campus. Due to the sensitive nature of its business, Forest Lawn requires a peaceful and serene setting surrounded by natural beauty. Its lawns and tree-lined vistas are important features of the property and major reasons why people choose to inter their loved ones at the Forest Lawn-Covina Hills cemetery. Funeral services, often of a religious nature, are regularly conducted on-site and people visiting the gravesites of their family and friends require a tranquil setting for quiet contemplation. It is important to Forest Lawn that the privacy of the families who use their services be respected and protected.

Forest Lawn appreciates the work of Cal Poly Pomona and its need to modernize and upgrade its facilities. However, Forest Lawn has concerns about potential impacts of the Master Plan to its recycled water usage and infrastructure and its need to provide a quiet and serene setting for its visitors.

Response O1-1

The comment thanks Cal Poly Pomona for the opportunity to comment. The comment provides a description of the Forest Lawn cemetery, which is located adjacent to Cal Poly Pomona. The comment notes that Forest Lawn has concerns about the potential impacts of the Master Plan to its recycled water usage and infrastructure and its need to provide a quiet and serene setting for its visitors. This comment is an introductory comment and does not address the adequacy or conclusions of the Draft EIR. Therefore, no further response is required. The specific comments raised following this introduction are listed separately, along with Cal Poly Pomona's individual responses.

Comment O1-2

Project Description

Cal Poly Pomona is proposing to demolish, renovate, and construct new facilities and to improve the roadway network to accommodate student population growth at its main campus. Key elements of the Master Plan as described in the Draft EIR include 1,049 net new beds and 600,000 gross square feet of net new buildings. Within existing and approved development and proposed new development under the Master Plan, there would be a total of approximately 6.5 million gross square feet of building space.

Response O1-2

The comment provides a summary of the EIR Project Description. However, the comment incorrectly states that the proposed Master Plan would include 1,049 net new beds. The Draft EIR actually states that the proposed Master Plan would provide 1,040 net new beds. The comment states that the Master Plan would result in 600,000 gross square feet of net new buildings, which is correct (see Section 3.1, Project Overview, page 3-1). The comment incorrectly states that within the existing and approved development and proposed new development under the Master Plan, there would be a total of approximately 6.5 million gross square feet of building space. The Draft EIR actually states that with existing and approved development and proposed new Master Plan development, there would be a total of approximately 6.6 million gross square feet of building space at Cal Poly Pomona (see Section 3.1, Project Overview, page 3-1). The comment does not raise any environmental issues regarding the adequacy or conclusions of the Draft EIR; therefore, no further response is required.

Comment O1-3

Recycled Water

Forest Lawn's primary concern is that increased potable water use to support growth and development under the Master Plan might impact the availability of recycled water for irrigation use, both at Cal Poly Pomona and at Forest Lawn. Forest Lawn made substantial capital investments to improve the recycled water system that serves both Forest Lawn and Cal Poly Pomona, and Forest Lawn has been receiving recycled water through this system for a decade under a long-term agreement executed in 1982.

Well 2 was operational and provided backup water to the recycled water system when Forest Lawn began taking water from the system a decade ago. Well 2 was used when the reclamation plant supply was restricted and other times on a voluntary basis by Cal Poly Pomona. Forest Lawn has offered on multiple occasions to assist with rehabilitating Well 2 to supplement the water going into the recycled water reservoir that Forest Lawn helped fund, which supplies both Cal Poly Pomona's and Forest Lawn's irrigation systems. The Draft EIR, including the Water Supply Evaluation at Appendix G, describes that Well 2 will be rehabilitated and diverted to Cal Poly Pomona's potable water treatment system.

The Draft EIR analysis does not mention, let alone consider, Cal Poly Pomona's longstanding obligation to keep the recycled water system intact and to continue to provide recycled water to Forest Lawn under the 1982 agreement. The Draft EIR discloses that potable water use will increase under the Master Plan and that water infrastructure previously used for recycled water will be improved to provide potable water to serve such development. The Draft EIR must be revised to include analysis of the impacts of committing infrastructure previously used for recycled water to potable water, including reasonably foreseeable project and cumulative impacts that may result if Cal Poly Pomona is impacted in its ability to meet its contractual obligations to supply Forest Lawn's with recycled water (e.g., potable water having to replace recycled water, new construction to restore the recycled water system, etc.).

Response O1-3

The comment provides background information regarding the recycled water system at Cal Poly Pomona and an agreement executed in 1982 in which Cal Poly Pomona provides Forest Lawn with recycled water. The comment states that the Draft EIR analysis does not mention the 1982 agreement. With respect to water supplies and related infrastructure, the comment expresses concern about the Draft EIR's discussion of Cal Poly Pomona's plans to replace its recycled water reservoir, change the treatment methods for Well No. 2 to allow it to be used as potable

water, and upgrade its recycled water infrastructure to serve increased campus demand resulting from Master Plan buildout. The comment further notes that Forest Lawn assisted with funding for the reservoir and has offered to assist with rehabilitation of Well No. 2. Lastly, the comment states that the Draft EIR must be revised to include analysis of the impacts of committing infrastructure previously used for recycled water to potable water, including reasonably foreseeable project and cumulative impacts that may result if Cal Poly Pomona is impacted in its ability to meet its contractual obligations to supply Forest Lawn's with recycled water.

Cal Poly Pomona values its longstanding relationship with Forest Lawn Memorial-Park at Covina Hills and intends to continue meeting its contractual obligations to supply Forest Lawn with recycled water. Specifically, Cal Poly Pomona acknowledges the executed 1982 agreement between Cal Poly Pomona and Forest Lawn, an executed 2012 amendment to the 1982 agreement, and a 2012 Memorandum of Understanding (MOU), which collectively memorialize the two entities' shared use of the Cal Poly Pomona's reclaimed water system for irrigation purposes and set forth Cal Poly Pomona's contractual obligation to ensure the reclaimed water system remains intact and available to Forest Lawn, and stipulate the timing and quantity of water draws by both entities. In addition to continuing to meet its contractual obligations to supply Forest Lawn with recycled water, Cal Poly Pomona will involve Forest Lawn in project planning for improvements to the well to ensure Forest Lawn's operations are considered during the planning and design phases. Additionally, Cal Poly Pomona staff has also communicated directly with Forest Lawn's Covina Hills staff in response to its expressed concerns about reclaimed water.

In response to this comment, Section 3, Project Description, Section 4.19, Utilities and Service Systems, and Appendix G, Water Supply Evaluation, of the Draft EIR have been revised in this Final EIR to acknowledge the executed 1982 agreement and 2012 amendment and MOU and to clarify that Master Plan projects related to Cal Poly Pomona's reclaimed water reservoir, Well No. 2, and reclaimed water pipelines would not result in any changes to the executed 1982 agreement or 2012 amendment or MOU, or to Cal Poly Pomona's obligation and intent to continue the provision of reclaimed water for irrigation purposes to Forest Lawn. Specifically, proposed improvements to Well 2 would not impact the availability of water for Forest Lawn's irrigation use. The existing pipeline connection from Well 2 to the reclaimed water reservoir will remain intact and will not be impacted by the proposed improvements. The proposed improvements at Well 2 are intended to treat water at the wellhead to a higher (domestic or potable) standard and provide the opportunity to expand its potential applications beyond irrigation in the future.

Section 3, Project Description, of the Draft EIR, Section 4.19, Utilities and Service Systems, of the Draft EIR and Appendix G, Water Supply Evaluation (Appendix G of the Draft EIR) have been revised to incorporate this updated information in this Final EIR, as follows:

Chapter 3, Project Description, Section 3.7.6, Utility Infrastructure Improvements (page 3-38)

The proposed improvements to Cal Poly Pomona's domestic water system and other water conveyance infrastructure are briefly summarized below. None of these improvements are anticipated to result in any changes to the executed 1982 agreement or 2012 amendment or Memorandum of Understanding, or to Cal Poly Pomona's obligation and intent to continue the provision of reclaimed water for irrigation purposes to Forest Lawn-Covina Hills.

Section 4.19.1.1, Utilities and Service Systems, Environmental Setting, Water (page 4.19-2)

Recycled Water Use

~~TVMWD does not rely on wastewater or recycled water to meet the needs of their purchaser. However,~~ Cal Poly Pomona has been using recycled water provided by the City for crop irrigation and landscaping since 1965 (CPP 2025). An estimated 97% of the campus is irrigated with ~~the use of~~ recycled water (CPP 2025). Cal Poly Pomona provides the neighboring Forest Lawn Memorial Park with a share of its reclaimed water deliveries from the City in accordance with the terms of an executed 1982 agreement and 2012 amendment and Memorandum of Understanding (MOU) between the Board of Trustees of the California State University on behalf of California State Polytechnic University, Pomona, and the Forest Lawn Company (currently known as Forest Lawn Memorial-Park [Forest Lawn]).

The executed 1982 agreement stipulates the location, function, capacity, respective entities' ownership, maintenance, and cost-sharing responsibilities for the related infrastructure and prohibits Cal Poly's removal or restriction of the operation of its reclaimed water system or the delivery of reclaimed water to Forest Lawn-Covina Hills without that entity's written consent.

The 2012 amendment details a proposed "high lift" pump, metering and control technology at the existing reclaimed water reservoir, scheduled water use by each entity, and other terms and conditions.

The executed 2012 MOU, executed between the Board of Trustees of the California State University on behalf of California State Polytechnic University, Pomona, and Forest Lawn sets forth the services Cal Poly Pomona Facilities Planning & Management was to provide for the planning, coordination, plan check, permit, and inspection of a reclaimed water line extension.

Appendix G, Water Supply Evaluation, Section 5.4, Water Resources, Recycled Water (pages 14 through 15)

~~TVMWD does not rely on wastewater or recycled water to meet the needs of their purchaser. However,~~ Cal Poly Pomona has been using recycled water provided by the City for crop irrigation and landscaping since 1965 (CPP 2025). An estimated 97% of the campus is irrigated with ~~the use of~~ recycled water (CPP 2025). Cal Poly Pomona provides the neighboring Forest Lawn Memorial Park with a share of its reclaimed water deliveries from the City in accordance with the terms of an executed 1982 agreement and 2012 amendment and Memorandum of Understanding (MOU) between the Board of Trustees of the California State University on behalf of California State Polytechnic University, Pomona, and the Forest Lawn Company (currently known as Forest Lawn Memorial-Park [Forest Lawn]).

The executed 1982 agreement stipulates the location, function, capacity, respective entities' ownership, maintenance, and cost-sharing responsibilities for the related infrastructure and prohibits Cal Poly's removal or restriction of the operation of its reclaimed water system or the delivery of reclaimed water to Forest Lawn-Covina Hills without that entity's written consent.

The 2012 amendment details a proposed "high lift" pump, metering and control technology at the existing reclaimed water reservoir, scheduled water use by each entity, and other terms and conditions.

> The executed 2012 MOU, executed between the Board of Trustees of the California State University on behalf of California State Polytechnic University, Pomona, and Forest Lawn sets forth the services Cal Poly Pomona Facilities Planning & Management was to provide for the planning, coordination, plan check, permit, and inspection of a reclaimed water line extension.

The above-listed changes do not constitute substantial new information, as defined by the State CEQA Guidelines Section 15088.5, as they do not result in a new or substantially more significant impact. As such, recirculation of the Draft EIR is not required under CEQA standards and is not required prior to consideration by the Board of Trustees for certification.

Comment O1-4

Noise and View Impacts

The Draft EIR does not identify Forest Lawn as a visually sensitive area for the Master Plan or as a noise-sensitive receptor. It is important to Forest Lawn that its existing tranquil character and quality be protected, especially during interment ceremonies due to the hypersensitivity of the participants. Without a specific analysis of Forest Lawn as a sensitive receptor, we are unable to determine the anticipated noise and view impacts to the cemetery site.
In particular, we are concerned about construction nearest Forest Lawn and that expanded outdoor activities at the relocated ROTC facilities and the Arabian Horse Center Renovation and Event Center might result in noise impacting Forest Lawn. The Draft EIR must be revised to include specific analysis of the noise and view impacts to Forest Lawn and, if applicable, to require additional mitigation measures to reduce such impacts.

Response O1-4

The comment states that the Draft EIR does not identify Forest Lawn as a visually sensitive area for the Master Plan or as a noise-sensitive receptor. The comment states that the Draft EIR must be revised to include specific analysis of the noise and aesthetic impacts to Forest Lawn and, if applicable, to require additional mitigation measures to reduce such impacts.

Aesthetic/Visual Resources (Views)

As stated in the Draft EIR, no designated scenic vistas are identified in relevant planning documents, including the City of Pomona 2014 General Plan, City of Walnut General Plan, or Los Angeles County 2035 General Plan, or by Cal Poly Pomona (see Section 4.1.4.1, Issues Not Further Evaluated, page 4.1-15). Additionally, there are no designated scenic vistas within the Cal Poly Pomona main campus. The Draft EIR's analysis provided discussion of key viewpoints, as shown in Figure 4.1-1 and Figure 4.1-2. These viewpoints have been selected based on visibility from public areas, previously identified "view corridors," and views that could be potentially affected by implementation of the proposed Master Plan. The Draft EIR did not identify Forest Lawn as a visually sensitive area due to a number of factors. Notably, CEQA requires impact analysis on public views of scenic vistas, as opposed to views that may be available from the vantage point of private properties. Public views are views that can be observed by the general public from a public vantage point, such as a public roadway, public park, or public open space area. Views that are available from private property (e.g., views observed from residences or residential yards) are not specifically protected under CEQA, and effects on private views are not considered impacts on the environment generally under CEQA. This is supported by numerous CEQA cases, including *Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist., supra,* 116 Cal.App.4th at p. 402. Given this, private views from Forest Lawn through the Master Plan area are outside of the scope of the required environmental analysis.

Moreover, while the proposed Master Plan construction activities would be visible, these activities and changes are temporary and short-term in nature and would not be present following completion of construction. Implementation of the proposed Master Plan components, including the ROTC Relocation and Site Reuse, and the Arabian Horse Center/Event Center would be similar in scale, massing, height, and character to existing development. In addition, the ROTC Relocation and Site Reuse and the Arabian Horse Center/Event Center would be located 2,100 feet and 4,000 feet from Forest Lawn, respectively. Views from Forest Lawn to the Cal Poly Pomona campus are limited due to the considerable distance between the two, intervening topography, and development. Therefore, implementation of the proposed Master Plan is not anticipated to result in impacts to views from Forest Lawn.

Noise

The Forest Lawn cemetery property is located just outside of the boundaries of the City of San Dimas and the City of Walnut, in Los Angeles County. As presented in the Noise Elements of their General Plans, neither San Dimas (1991), Walnut (2018), nor Los Angeles County (1998) categorize a cemetery as a noise-sensitive land use. Consequently, noise exposure at Forest Lawn cemetery resulting from project construction and operation was not required to be analyzed in the Draft EIR.

However, as noted in the construction noise analysis in the Draft EIR (Section 4.13.4.2, Project Impacts, page 4.13-38), typical noise levels from future construction projects carried out under the Master Plan would attenuate (diminish) to less than significant levels within 175 feet of the construction boundary. For construction noise impacts within Los Angeles County, the significance threshold is 75 dBA $L_{eq\ 1Hr}$. The closest construction boundary for a Master Plan project (the lower reservoir tank replacement) would be approximately 650 feet from the Forest Lawn property, well beyond the 175 feet radius for significant construction noise impacts. The Camino del Sur neighborhood is at a similar distance from the closest future construction as Forest Lawn (550 feet for this neighborhood compared to 650 feet for Forest Lawn), and the Draft EIR concludes construction noise impacts for this residential neighborhood would be less than significant. Consequently, it can be concluded from the existing analysis in the Draft EIR that construction noise impacts from the Master Plan on Forest Lawn would be less than significant, with no mitigation required.

With regard to noise generated from mechanical systems associated with potential new structures, the Draft EIR (Section 4.13.4.2, Project Impacts, page 4.13-41) found that HVAC systems for even larger buildings would result in noise levels well below a residential exposure threshold of 65 dBA CNEL (58 dBA $L_{eq\ hr}$) within 75 feet of the building. Therefore, the noise impact associated with permanent mechanical noise sources for proposed Master Plan development projects would be less than significant at off-campus receivers, including Forest Lawn. It should be noted the Los Angeles County Noise Element identifies exterior noise exposure levels up to 80 dBA CNEL as "normally acceptable" for a cemetery; therefore, the 65 dBA CNEL significance threshold applied in the Draft EIR would be very conservative for the cemetery property.

Regarding athletic and event facility noise, the closest boundary of the Forest Lawn property is located approximately 4,000 feet from the Arabian Horse Center/Event Center. As concluded in the Draft EIR (Section 4.13.4.2, Project Impacts, page 4.13-41), at 1,500 feet, noise levels from a worst-case event at the Arabian Horse Center would attenuate to approximately 42 dBA L_{eq}. This noise level would attenuate to less than 36 dBA L_{eq} at 4,000 feet, resulting in noise exposure at Forest Lawn well below even the residential daytime exposure limit of 55 dBA L_{eq}. The new Soccer Field and Kellogg Stadium Replacement would be located no closer than 4,250 feet from the Forest Lawn property. Noise from matches and other activities at these new athletic facilities were found to attenuate to 62 dBA L_{eq} at 100 feet from the facilities; at 3,200 feet, this noise would attenuate to approximately 32 dBA L_{eq}. Therefore, new athletic facilities operational noise would be less than 32 dBA L_{eq} at Forest Lawn, also well below even the residential daytime exposure limit of 55 dBA L_{eq}. Consequently, it can be concluded from the

existing analysis in the Draft EIR that event center and athletic facility noise impacts from the Master Plan on Forest Lawn would be less than significant, with no mitigation required.

Regarding the relocated ROTC facilities, these facilities are currently used as office space and lounges for ROTC staff and cadets. The ROTC functions also include gathering in formation for inspections, to gain accountability, and warm-up for physical training. ROTC functions occurring outdoors do not use amplified sound and typically occur in the mornings outside of Forest Lawn's hours of operation. These same uses are expected to occur after the proposed relocation. Because no amplification systems would be used as part of these facilities, and they would be located 2,100 feet away from Forest Lawn, noise impacts would not occur.

Comment O1-5

Transportation and Traffic

The Draft EIR includes analysis of regional roadway improvements, including: new controlled intersections on Kellogg Drive at East Campus Drive and University Drive; conversion of East Campus Drive from a one-way road to a two-way road; intersection improvements at East Campus Drive and South Campus Drive (with left turn added); new signage to direct traffic around the campus to access I-10 (on South Campus Drive at both Kellogg Drive and East Campus Drive); signage and gateway elements including monument sign, landscaping, and lighting with banners; and narrowing of Kellogg Drive. The Draft EIR evaluated certain policies in the City of Walnut and City of Pomona General Plans but did not consider the County of Los Angeles General Plan, including Policy M 4.7, which encourages maintenance of a minimum of LOS D at County intersections. Forest Lawn is concerned about potential transportation impacts, in particular, consideration of ongoing funeral processions as part of Cal Poly Pomona's construction traffic management plan.

Response O1-5

The comment summarizes the proposed Master Plan mobility and circulation improvements that were considered in the Draft EIR. The comment states that the Draft EIR did not consider the County of Los Angeles General Plan, including Policy M 4.7, in the analysis. which encourages maintenance of a minimum of Level of Service (LOS) D at County intersections.

As stated in the Draft EIR, as a state entity, Cal Poly Pomona is not subject to local government permitting or regulations, policies, or ordinances, such as the general plans and ordinances for the County of Los Angeles (Section 4.17.2.4, Regulatory Setting, Local, page 4.17-27). Because Cal Poly Pomona is not subject to local general plans or other local land use plans and/or ordinances, these regulations are not summarized or further analyzed in Section 4.17, Transportation.

Also, as stated in the Draft EIR, Senate Bill (SB) 743 removed the use of automobile delay or traffic congestion as measured by LOS for determining transportation impacts in environmental review (Section 4.17.2.2, Regulatory Setting, State, page 4.17-22 through 4.17-23). Instead, the CEQA Guidelines now specify that vehicle miles traveled (VMT) is the appropriate metric to evaluate transportation impacts. SB 743, which is codified in Public Resources Code (PRC Section 21099), required changes to the guidelines implementing CEQA (CEQA Guidelines) regarding the analysis of transportation impacts and the metric upon which to assess those impacts. Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." Section 21099 also provides that following the certification of the CEQA Guidelines implemented pursuant

to SB 743, "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" pursuant to CEQA.

The legislation directed the State of California's Office of Land Use and Climate Innovation (LCI), formerly the Office of Planning and Research, to look at different metrics for identifying transportation impacts and make corresponding revisions to the CEQA Guidelines. Following several years of draft proposals and related public comments, LCI settled upon VMT as the preferred metric for assessing passenger vehicle-related impacts and issued revised CEQA Guidelines in December 2018, along with a Technical Advisory on Evaluating Transportation Impacts in CEQA (LCI Technical Advisory) (OPR 2018) to assist practitioners in implementing the CEQA Guidelines revisions to use VMT as the new metric. Under the revised Guidelines, vehicle LOS is no longer to be used as a determinant of significant environmental impacts, and an analysis of a project's impacts relative to VMT is the new metric against which significant impacts are to be assessed (Section 4.17.2.2, Regulatory Setting, State, page 4.17-22 through 4.17-23).

Furthermore, the CSU, City of Pomona, City of Walnut, and Los Angeles County all have adopted VMT as their transportation CEQA impact criteria, consistent with SB 743. These agencies no longer use LOS to determine CEQA transportation impacts. Therefore, Section 4.17, Transportation, analyzes VMT impacts, rather than LOS impacts, consistent with SB 743 and updates to the CEQA Guidelines.

Cal Poly Pomona respects and acknowledges the concerns expressed regarding the operations of Forest Lawn and, as a neighboring institution and member of the broader community, is committed to fostering positive relationships with its neighbors. Cal Poly Pomona will engage in timely coordination with Forest Lawn regarding construction activities or operational changes associated with individual Master Plan projects that may have the potential to affect Forest Lawn's operations, beginning early in the planning process. Chapter 3, Project Description, of the Final EIR has been revised to reflect this.

Chapter 3, Project Description, Section 3.8, Project Design Features and Continuing Best Practices (page 3-40)

- PDF-TRA-1: When individual Master Plan construction projects require significant work within existing roadways, Cal Poly Pomona will require the project contractor to implement a construction traffic control plan. This requirement will be incorporated into construction bid packages. The plans will conform with the current version of the State of California Department of Transportation Standard Specifications, where applicable, and will be reviewed and approved by Cal Poly Pomona prior to implementation. The plans will also be reviewed by the City of Pomona and any other local municipalities that are affected by construction activities, as well as by neighboring memorial park owner Forest Lawn to ensure impacts to its operations are avoided or minimized to the maximum extent feasible. Such notice will be provided sufficiently in advance of construction commencement to allow for the provision of input and development of alternative traffic arrangements, if necessary. The traffic control plan will include any detour plans and/or temporary traffic control devices warranted, per the current version of the California Manual on Uniform Traffic Controls Devices, to provide for public safety, maintenance of access, temporary roadway closures, if needed, and construction-area signage. Cal Poly Pomona will inform emergency services, campus transportation, and transit agencies of any roadway or lane closures and alternative travel routes to ensure adequate access for emergency vehicles when individual Master Plan construction projects will result in temporary lane or roadway closures.

Comment O1-6

We appreciate the opportunity to comment on the Draft EIR. Forest Lawn looks forward to working with Cal Poly Pomona to coordinate on recycled water infrastructure and construction activities in a way that minimizes impacts and assures that Forest Lawn can continue to provide its guests with a peaceful and respectful environment within which to mourn and celebrate the lives of their loved ones.

Response O1-6

The comment thanks Cal Poly Pomona for the opportunity to comment on the Draft EIR and coordinate further regarding the recycled water infrastructure and construction activities. The comment does not address the adequacy or conclusions of the Draft EIR; therefore, no further response is required.

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1 Executive Summary

1.1 Introduction

The California State University (CSU) has prepared this Environmental Impact Report (EIR) to inform the community, responsible agencies, trustee agencies, and other interested agencies and organizations, of the potential significant environmental effects resulting from implementation of the proposed California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan").[1] The proposed Master Plan provides a guide for the physical development of the campus. This Executive Summary lists the potentially significant environmental impacts and feasible mitigation measures or project alternatives that would avoid or substantially reduce those impacts. It also provides a brief description of the proposed Master Plan background, project overview, alternatives to the proposed Master Plan, issues to be resolved, areas of controversy known to Cal Poly Pomona, and a summary of environmental impacts. This EIR was prepared in compliance with the California Environmental Quality Act (CEQA) (Cal. Pub. Resources Code Section 21000-21189.3) and the CEQA Guidelines (Cal. Code Regs. tit. 14, Section 15000 *et seq*.).

1.2 Background

The CSU Board of Trustees require each CSU campus to develop and periodically update a Master Plan that depicts existing and proposed facilities "necessary to accommodate a specified enrollment at an estimated target date or planning horizon, in accordance with approved educational policies and objectives" (CSU 2012). Future enrollment for each CSU campus is defined by full-time-equivalent student (FTES[2]) enrollment targets developed by the campus in consultation with the CSU Office of the Chancellor Office (CSU 2017).

The last comprehensive revision to the Master Plan for the Cal Poly Pomona campus was approved in 2000 and was intended to guide campus development through 2010. Since then, a number of minor and major Master Plan revisions have been approved by the Chancellor's Office. The 2000 Master Plan provided a framework for land use, development, open space, and circulation to accommodate projected enrollment of 20,000 FTES on the campus by 2010. A number of 2000 Master Plan projects have been implemented as originally proposed. The proposed Master Plan identifies the steps needed to accommodate an enrollment of up to 30,000 FTES and estimates the probable building area and space types to accommodate this enrollment.

1 The Board of Trustees of the California State University (CSU Board of Trustees) is the State of California acting in its educational capacity and is responsible for the oversight of the California State University system, including the Cal Poly Pomona campus. The CSU Board of Trustees has authority over curricular development, use of property, development of facilities, and fiscal and human resources management. As such, the CSU Board of Trustees is the lead agency under CEQA and is responsible for review and certification of the EIR and for consideration of project approval. Cal Poly Pomona will act as point of contact for the CEQA process.

2 FTES is a unit of measurement that considers diverse student workloads (i.e. part-time vs. full-time students) and is used to measure the size of an institution and facilities entitlement for a campus.

1.3 Overview of the Project

1.3.1 Project Location and Setting

The existing Cal Poly Pomona main campus is located partially in the incorporated cities of Pomona and Walnut and in the unincorporated area of Los Angeles County, California. Los Angeles County (County) is located in Southern California, north of Orange County and west of San Bernardino County. The cities of Pomona and Walnut are located in the eastern portion of Los Angeles County.

The approximately 860-acre main campus, which is the subject of the proposed Master Plan, is generally bounded by the Interstate 10 Freeway (I-10) to the north, Valley Boulevard to the east, and West Temple Avenue to the south. The Mt. San Antonio Community College campus abuts the Cal Poly Pomona campus on the west.

The main campus includes Innovation Village, which occupies the southeastern portion east of South Campus Drive and north of West Temple Avenue, and University Village student housing, south of West Temple Avenue at Valley Boulevard. The main campus also includes portions of the Spadra Landfill. No changes to Innovation Village or University Village are proposed under the proposed Master Plan, and they are not further discussed in this document. The Cal Poly Pomona main campus hillside extends northwest abutting Forest Lawn Cemetery.

Beyond the main campus, Cal Poly Pomona owns property south of West Temple Avenue: the 300-acre Lanterman Development Center (formerly the State of California Lanterman Center for the Developmentally Disabled); the 159-acre Spadra Farm, a one-time agricultural portion of the Lanterman Development Center and current site of the university's teaching farm; and additional agricultural land, which formerly operated as the Spadra Landfill. No new development is proposed for the Lanterman Development Center, Spadra Farm, or Spadra Landfill under this proposed Master Plan.

Regional access to the main campus is provided by I-10, State Route (SR-) 57, and SR-60. Public transit service to the campus and vicinity is provided by Foothill Transit buses and Metrolink commuter rail. Foothill Transit has multiple stops along West Temple Avenue, South Campus Drive, and Kellogg Drive. Foothill Transit buses to Cal Poly Pomona include route numbers 190, 194, 195, 289, 480, 482, 486, and the Silver Streak route. The campus is near both the Metrolink San Bernardino Line and the Riverside Line, as well as the future extension of the Foothill Gold Line Construction Authority A-Line. Nearby Metrolink stations include the Pomona Downtown Station, Pomona North Station, and City of Industry Station. Campus-run shuttle services between the Pomona North Station and main campus are currently available at peak times.

1.3.2 Project Objectives

California Environmental Quality Act (CEQA) Guidelines Section 15124(b) requires the statement of a project's objectives to be clearly written so as to define the underlying purpose of a project in order to permit development of a reasonable range of alternatives and aid the lead agency in making findings when considering a project for approval. The underlying purpose of the proposed Master Plan is to guide the physical development of the campus in a manner that supports the university's 2017–2025 Strategic Plan, its 2018-19 through 2022-23 Academic Master Plan, and the enrollment of approximately 30,000 FTES and accompanying faculty and staff growth, while preserving and enhancing the campus environment and quality of life.

The following project objectives are based on the goals and organizing principles of the proposed Master Plan and support the underlying purpose of the project:

1. Support and advance Cal Poly Pomona's educational mission, as defined by the California Education Code, by guiding the physical development of the campus to accommodate enrollment growth to approximately 30,000 FTES and expanding the number of faculty and staff to support such enrollment growth, subject to funding.
2. Renovate or demolish buildings that are inefficient in terms of operation, maintenance, and user comfort due to age and critical deferred maintenance.
3. Replace demolished and temporary buildings with higher-density, mixed-use buildings that consolidate and integrate colleges and student support services.
4. Strengthen campus residential life by constructing new or replacement buildings to:
   - Increase student housing capacity by approximately 1,040 net new beds to enhance student experience, support, wellness, success, and retention.
   - Include a more diverse mix of housing types for students (freshman dormitories, pod configurations, suites, and apartments).
   - Provide high-quality and affordable student housing options.
   - Include common spaces, active outdoor spaces, and space for student support services within student housing.
5. Preserve space in the campus core for academic uses and programming and student-focused services.
6. Provide I-Poly High School students additional space to accommodate recreational activities, subject to the Los Angeles County Office of Education securing grant funds.
7. Provide mobility enhancements for safe, sustainable, and accessible circulation within and around the campus for pedestrians and bicyclists, to reduce reliance on vehicles; and provide students, faculty/staff, and visitors with safe and easy access to public transit as an alternative to bringing a car to campus.
8. Provide high-quality athletic facilities and optimize existing recreational fields by utilizing land area and improving connections to and through the sports facilities.
9. Update infrastructure to provide safe and reliable utilities to the campus community.
10. Reduce reliance on fossil fuel consumption by expanding campus renewable energy production and by constructing and renovating buildings to meet Leadership in Energy and Environmental Design (LEED) certification requirements.

1.3.3 Project Overview

The proposed Master Plan addresses Cal Poly Pomona's current and future needs for physical facility, space, and infrastructure improvements to support a planned enrollment of approximately 30,000 FTES on the Cal Poly Pomona main campus through an approximate planning horizon of year 2040 subject to available funding. The proposed Master Plan also identifies priority projects to be implemented in the near term (the first 5 to 10 years of Master Plan implementation). The primary strategies for implementing the proposed Master Plan include renovation of existing buildings (renovation), demolition and replacement of existing buildings in the same general physical location (replacement), minimal construction of new buildings at the core of campus (new construction) and retention of most buildings in their existing location and configuration (buildings to remain). The proposed Master Plan would include approximately 600,000 GSF of net new building space for academics, student support services, and athletic and recreation facilities. The project would also include 1,040 net new

beds added to the main campus. With existing and approved development and proposed new Master Plan development, there would be a total of approximately 6.5 million GSF of building space at Cal Poly Pomona.

Additionally, outdoor athletics and recreational facility improvements are planned. The proposed Master Plan also identifies mobility and circulation, utilities and infrastructure, and sustainability and resiliency improvements and related strategies. No new development is proposed for the Lanterman Development Center, Spadra Farm, Spadra Landfill, Innovation Village, or University Village under this proposed Master Plan and these locations are not addressed further in this EIR.

1.4 Project Alternatives

This EIR evaluates three alternatives to the proposed Master Plan, including:

- **Alternative 1: No Project Alternative** - Under the No Project Alternative, the proposed enrollment milestone of 30,000 FTES and proposed program of new development and infrastructure improvements would not be adopted. Future development identified in the adopted 2000 Master Plan could continue to be pursued.
- **Alternative 2: Reduced Development/Historic Preservation Alternative** - Alternative 2, focuses on proposed development on the Cal Poly Pomona campus that would avoid demolition of historic buildings and/or historic district contributors.
- **Alternative 3: Reduced Development/Adaptive Reuse Alternative** - Alternative 3 focuses on proposed development on the Cal Poly Pomona campus that would avoid demolition of historic buildings and renovations of historic buildings and/or historic district contributors that involve changes to exterior building envelopes.

Alternative 3 (Reduced Development/Adaptive Reuse Alternative) would be the environmentally superior alternative because it would avoid the significant and unavoidable impact to historic resources, and all other impacts would remain the same or be reduced compared to the proposed Master Plan. Although Alternative 1 (No Project Alternative) would also avoid historic resources impacts, it would introduce a new significant and unavoidable impact to agricultural resources and would result in more severe impacts to biological resources. However, Alternative 1 would not meet the basic project objectives and Alternative 3 would not fully meet these basic objectives of the proposed Master Plan. See Chapter 6, Alternatives, for additional information.

1.5 Issues to be Resolved

CEQA Guidelines Section 15123(b)(3) requires that an EIR identify issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. Regarding the project, the major issues to be resolved include decisions by the CSU Board of Trustees as CEQA lead agency related to:

- Whether this EIR adequately describes the environmental impacts of the project.
- Whether the benefits of the project override environmental impacts, if any, that cannot be feasibly avoided or mitigated to a level of insignificance.
- Whether there are other mitigation measures that should be applied to the project besides those mitigation measures identified in the EIR.
- Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the Project and achieve most of the basic objectives.

1.6 Areas of Known Controversy

On April 8, 2024, a Notice of Preparation (NOP) was published for the project to determine the scope and extent of environmental issues to be addressed in this EIR. The NOP was circulated to the State Clearinghouse and to state, regional, and local agencies in accordance with the CEQA Guidelines. The NOP was circulated for a 30-day comment period from April 8, 2024, to May 8, 2024. An EIR scoping meeting was held on April 24, 2024, to solicit input from interested agencies, individuals, and organizations.

A total of five comment letters were received on the NOP during the scoping period, all comments were from public agencies. For a complete list of public comments received during the public scoping periods refer to Appendix A.

The following is a discussion of issues that are likely to be of interest to agencies and interested members of the public during the environmental review process. Every concern applicable to the CEQA process is addressed in this EIR, but this list is not necessarily exhaustive; rather, it attempts to capture concerns or issues that are likely to generate the greatest interest based on the input received during the scoping processes:

- Hydrology and Water Quality/Utilities and Service Systems: Potential impacts related to construction and project drainage.
- Transportation: Preparation of a review of vehicle miles traveled and safety analysis at relevant freeway interchange ramp terminal intersections.

1.7 Summary of Environmental Impacts

This subsection provides a summary of the environmental impacts associated with implementation of the proposed Master Plan. Table 1-1 provides a complete list of the proposed Master Plan's environmental impacts including the level of significance before and after mitigation, based on the analysis and conclusions presented in Chapter 4, Environmental Setting, Impacts Analysis, and Mitigation Measures. Most of the potentially significant impacts can be reduced to less than significant through incorporation of mitigation measures identified in Chapter 4.

The proposed Master Plan, however, would have a significant unavoidable impact related to Historical Resources (Impact 4.6-1). Although implementation of proposed mitigation measures would lessen, avoid, and partially mitigate potentially significant impacts on historic resources because actions would be taken to avoid, evaluate, document, consult, and otherwise treat the resource appropriately, in accordance with pertinent laws and regulations. However, CEQA Guidelines Section 15126.4(b)(2) notes that in some circumstances, documentation of a historical resource shall not mitigate the effects of demolition of that resource to less than significant because the historic resource would no longer exist. Therefore, because the potential for permanent loss of a historic resource or its integrity cannot be precluded, impacts to historical resources resulting from implementation of the proposed Master Plan are concluded to be significant unavoidable. See Section 4.6, Cultural Resources – Historical Resources, for additional information about this impact.

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
4.1 Aesthetics			
Impact 4.4-1: The project would not conflict with applicable zoning and other regulations governing scenic quality.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.1-2: The project could create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	Potentially Significant	MM-AES-1: Construction Lighting Controls. During construction, Cal Poly Pomona shall take steps necessary to ensure that temporary construction-related security lighting is arranged in such a manner that lighting will not directly shine on or produce glare on adjacent motorists and residential uses. MM-AES-2: Glare Controls. During the preparation of final site design plans for projects implemented under the proposed Master Plan, Cal Poly Pomona shall ensure all building structures will not contain large expanses of reflective glass or reflective metal surfaces that would cause undue glare to passing motorists and/or present a visual hazard to adjacent land uses.	Less than Significant
Impact 4.1-3: The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to aesthetics	Less than Significant	Mitigation not required.	Less than Significant
4.2 Agriculture and Forestry Resources			
Impact 4.2-1: The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.	Less than Significant	Mitigation not required.	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
Impact 4.2-2: The project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.2-3: The project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.2-4: The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to agricultural resources.	Less than Significant	Mitigation not required.	Less than Significant
4.3 Air Quality			
Impact 4.3-1: The project would not conflict with or obstruct implementation of the applicable air quality plan.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.3-2: The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard.	Less than Significant	Mitigation not required.	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
Impact 4.3-3: The project would not expose sensitive receptors to substantial pollutant concentrations.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.3-4: The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.3-5: The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to air quality.	Less than Significant	Mitigation not required.	Less than Significant
4.4 Biological Resources			
Impact 4.4-1: The project could have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.	Potentially Significant	MM-BIO-1: Project-Specific Biological Assessments. For individual projects that could directly or indirectly impact special-status plant or wildlife species or special-status species' habitat, as determined by a qualified biologist, Cal Poly Pomona shall require the focused biological surveys outlined in this mitigation measure be conducted prior to the commencement of construction activities. For individual projects that will not directly or indirectly impact special-status plant or wildlife species or their habitat, as determined by a qualified biologist (e.g., renovation projects comprising indoor work only), no surveys for biological resources shall be required. A report describing the results of each survey shall be provided to Cal Poly Pomona prior to the start of individual project activities. The report shall include, at a minimum 1) a description of the biological conditions in the vicinity of the individual project site; 2) identification of special-status species observed or detected, if any, including maps depicting their location(s) and potentially suitable habitat; and 3) a description of impacts to special-status species and their habitat that have the potential to occur as a result of individual project implementation. If an individual project has the potential to directly or indirectly impact special-status species or their habitat,	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		the report shall identify Master Plan EIR mitigation measures from this EIR to reduce potentially significant impacts to these resources to less than significant. If additional mitigation measures, beyond those outlined in this EIR, are required to reduce potentially significant impacts to these resources to less than significant, such measures will also be identified. 1) **Special-Status Plants.** For individual projects that could directly or indirectly impact special-status plant species, as determined by a qualified biologist, pre-construction focused botanical surveys shall be conducted by a qualified botanist during the appropriate blooming period for special-status plant species that may be impacted. Botanical surveys may be required for the following species, which have the potential to occur within the study area: intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*), Parry's spineflower (*Chorizanthe parryi* var. *parryi*), many-stemmed dudleya (*Dudleya multicaulis*), mesa horkelia (*Horkelia cuneata* var. *puberula*), white rabbit-tobacco (*Pseudognaphalium leucocephalum*), and chaparral ragwort (*Senecio aphanactis*). Special-status plant populations that may be directly or indirectly impacted during individual project implementation shall be demarcated using a Global Positioning System with submeter accuracy and flagged in the field with high-visibility tape or similar. Direct impacts to special-status plants shall be avoided and a qualified biologist shall delineate an appropriate avoidance buffer around the plants, within which construction activities shall be prohibited in order to avoid indirect impacts to these resources. A qualified biologist shall recommend construction best management practices required to avoid or minimize indirect impacts to special-status plants near construction activities. If avoidance of direct or indirect impacts to special-status plant species is not feasible, and if the project-specific analysis determines the impact to be significant absent mitigation, compensatory mitigation shall be required, entailing one of, or a combination of, the following: a) The on-site or off-site protection, through dedication of an on-site or off-site conservation easement and/or the purchase of mitigation credits at	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		an approved mitigation bank. Individual plants lost shall be mitigated at a minimum 1:1 ratio, with the final required mitigation ratio to consider acreage, functions, and values of the impacted population and the mitigation population. b) If it is not feasible to preserve a known population of a special-status plant species to be impacted, all or a portion of the mitigation obligation shall be met through the creation of a new population in suitable unoccupied habitat capable of supporting the species. For population creation, prior to disturbance to a population of a special-status plant species, propagules shall be collected from the population to be lost. The propagules, which may include seed collection or cuttings, will be used to establish a new population on suitable, unoccupied habitat. Transplantation may be attempted but will not be used as the primary means of plant salvage and population creation. Lands where creation will occur shall be protected through establishment of a conservation easement. For all conserved lands, a Conservation Management Plan shall be prepared by a qualified botanist and reviewed and approved by Cal Poly Pomona prior to individual project implementation. The plan shall include, at a minimum: a) Detailed methods of preservation, enhancement, rehabilitation, and/or propagation and planting shall be described, as appropriate b) Success criteria and long-term monitoring and management requirements to ensure mitigation success, including requirements that all mitigation populations be self-producing. Populations will be considered self-producing when: i. Plants reestablish annually for a minimum of 5 years with no human intervention such as supplemental seeding; and ii. Reestablished and preserved habitats contain an occupied area and flower density comparable to or that exceed those at the impacted population.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		c) Adaptive management and remedial measures shall be implemented if success criteria are not achieved d) Responsible parties and funding sources shall be identified for any mitigation lands required to be conserved in perpetuity 2) Coastal California Gnatcatcher. For individual projects that have the potential to directly or indirectly impact coastal California gnatcatcher (*Polioptila californica californica*), focused surveys shall be conducted prior to the start of construction to document the extent of occupied habitat. Surveys shall be conducted in accordance with the most recent United States Fish and Wildlife Service protocols and shall cover all potentially suitable habitat for coastal California gnatcatcher within 500 feet of proposed disturbance areas. Focused surveys shall be completed no more than 1 year prior to the start of the individual project; if more than 1 year lapses between the completion of surveys and the start of an individual project, focused surveys shall be repeated. The extent of occupied habitat shall be clearly depicted on construction plans and the information provided to the construction supervisor and any personnel working near the buffer. Occupied habitat shall not be cleared between February 15 and August 31 (or sooner if a biologist demonstrates to the satisfaction of the U.S. Fish and Wildlife Service that all gnatcatcher nesting is complete). Occupied habitat that is temporarily impacted during construction of individual projects shall be restored to its original condition. Cal Poly Pomona shall prepare and implement a conceptual restoration plan detailing the methods of revegetation, success criteria, and monitoring and maintenance requirements to ensure mitigation success. The permanent loss of occupied coastal California gnatcatcher habitat shall be mitigated through habitat replacement of equal or better functions and values to those impacted by the project at a minimum 2:1 ratio, or as determined through the consultation process with U.S. Fish and Wildlife Service. Mitigation shall be achieved through on-site or off-site conservation of habitat and/or purchase of appropriate credits at an approved mitigation bank. To minimize potential indirect impacts to coastal California gnatcatcher, construction-related activities within 500 feet of occupied habitat will be	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		timed to occur outside of the breeding season (February 15 through August 31), if possible. Pre-constructions surveys for coastal California gnatcatcher shall be conducted in all suitable habitat within 500 feet of construction activities that will occur between February 15 and August 31. Pre-construction surveys shall be conducted by a qualified biologist familiar with identifying coastal California gnatcatcher and shall include 3 site visits, conducted 1 week apart, with the final site visit conducted no more than 7 days prior to the start of construction. If coastal California gnatcatcher is not detected, no further mitigation related to this species shall be required. If coastal California gnatcatcher is detected but breeding behaviors are not observed, work may proceed and weekly surveys shall continue until the individual(s) leave the area, nesting is detected, the breeding season ends, or construction ends. If an active nest (including nest building or a nest containing viable eggs or young) is detected during the pre-construction or weekly surveys, the project biologist shall flag the nest location and a 500-foot avoidance buffer, depict their locations on the construction plans, and provide the information to the construction supervisor and any personnel working near the nest buffer. To the extent feasible, no construction activities shall occur within the 500-foot avoidance buffer. Should it be necessary for construction activities to occur within the 500-foot avoidance buffer, a qualified biologist shall conduct sound monitoring near the observed nesting position(s) to document the pre-construction outdoor ambient noise level and any signs of disturbance prior to construction activities. Nest locations, their horizontal distances to planned construction activities, and the measured outdoor ambient noise levels shall be provided to a qualified acoustician, who shall recommend implementation of practical noise reduction technique(s), if necessary, that would yield predicted construction noise exposure at the nest location not greater than the allowable threshold of 60 A-weighted decibels (dBA) equivalent continuous sound level (L_{eq}) (1 hour) or ambient noise level, whichever is higher. Noise reduction techniques may include but are not limited to constructing a sound barrier, utilization of quieter equipment, adherence to equipment maintenance schedules,	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		installation of temporary sound barriers, or shifting construction work further from the nest. During construction activities within 500 feet of an active coastal California gnatcatcher nest, a qualified biologist shall monitor the nest locations and document any signs of disturbance. If there are signs of disturbance, further noise reduction techniques beyond those required to limit noise exposure at the nest to 60 dBA hourly L_{eq} or the ambient noise level, whichever is lower, shall be implemented. Night lighting shall be prohibited during construction within 500 feet of an active coastal California gnatcatcher nest, unless written concurrence is provided by the United States Fish and Wildlife Service. For individual projects that may affect coastal California gnatcatcher or its critical habitat, all necessary take authorizations shall be obtained through federal Section 7 consultation or a Section 10 Incidental Take Permit, in advance of construction initiation. 3) Crotch's Bumble Bee. If ground-disturbing activities occur outside of the overwintering season for Crotch's bumble bee (*Bombus crotchii*) (which extends from November through January), focused surveys shall be conducted in suitable habitat (areas that provide suitable nesting and/or foraging resources) within 50 feet of the construction footprint prior to the start of construction activities. Surveys shall be conducted by a qualified biologist familiar with the species' behavior and life history, in accordance with the recommendations described in the Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species, released by the California Department of Fish and Wildlife (CDFW) on June 6, 2023, or the most current version at the time of construction. The survey shall focus on detecting Crotch's bumble bee nests, as well as foraging individuals, within 50 feet of the disturbance footprint. If active nests of Crotch's bumble bee are present, an avoidance buffer of at least 50 feet, as determined by the project biologist, shall be established around the nest to reduce the risk of disturbance or accidental take. Construction activities shall not occur within the avoidance buffer(s) until the colony is no longer active (i.e., no bees are seen flying in or out of the nest for three consecutive days	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		indicating the colony has completed its nesting season and the next season's queens have dispersed from the colony). If a nest is detected or if foraging individuals are observed, Cal Poly Pomona shall consult with CDFW to confirm that any proposed site-specific avoidance measures, such as the avoidance buffers described above, are sufficient to avoid take. Additional avoidance measures could include but are not limited to seasonal restrictions pertaining to the removal of flowering plants and pesticide/herbicide use, dust control measures, and erosion control measures. If active nests cannot be avoided, or take of foraging individuals is anticipated, necessary take authorization shall be obtained in the form of an Incidental Take Permit pursuant to California Fish and Game Code Section 2081. Occupied habitat that is temporarily impacted during construction of individual projects shall be restored to its original condition. Cal Poly Pomona shall prepare and implement a conceptual restoration plan detailing the methods of revegetation, success criteria, and monitoring and maintenance requirements to ensure mitigation success. Compensatory mitigation for the permanent loss of occupied Crotch's bumble bee habitat shall be fulfilled through habitat replacement of equal or better functions and values to those impacted by the project at a minimum 1:1 ratio, or as otherwise determined through the Incidental Take Permit process. Mitigation shall be achieved through on-site or off-site conservation of habitat and/or purchase of appropriate credits at a CDFW-approved mitigation bank. 4) **Burrowing Owl.** For individual projects that could directly or indirectly impact burrowing owl (*Athene cunicularia*) or its habitat, as determined by a qualified biologist, the following requirements shall be implemented. a) **Habitat Assessment.** A habitat assessment shall be conducted in accordance with protocols established in the California Department of Fish and Game 2012 Staff Report on Burrowing Owl Mitigation, or most recent CDFW guidance, to evaluate the likelihood that a site supports burrowing owl. The results of the habitat assessment shall be provided to Cal Poly Pomona. If, based on the results of the habitat assessment, burrowing owl may be present in areas that could be directly or indirectly impacted during construction, breeding season and non-breeding season	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		surveys shall be required, as outlined in part b of this mitigation measure. If a qualified biologist determines that areas direct or indirect impacts could occur do not have the potential to support breeding or overwintering burrowing owl, no further mitigation related to this species shall be required. b) Breeding Season Surveys and Non-Breeding Season Surveys. Focused breeding and non-breeding season surveys for burrowing owl shall be conducted in accordance with protocols established in the California Department of Fish and Game 2012 Staff Report on Burrowing Owl Mitigation or most recent CDFW guidance. As outlined in the 2012 Staff Report, breeding season surveys shall occur from February 1 through August 31 and non-breeding season surveys shall occur from September 1 to January 31. If burrowing owl are not detected during either survey, pre-construction surveys shall be completed, as described in part c of this mitigation measure. If burrowing owls are detected during either breeding season or non-breeding season surveys, avoidance and preparation of a Burrowing Owl Plan shall be required as outlined in Part d and Part e of this mitigation measure. c) Pre-Construction Surveys. One pre-construction burrowing owl survey shall be completed no more than 14 days before initiation of site preparation or grading activities, and a second survey shall be completed within 24 hours of the start of site preparation or grading activities. If ground-disturbing activities are delayed or suspended for more than 30 days after the pre-construction surveys, the pre-construction surveys shall be repeated. Surveys for burrowing owl shall be conducted in accordance with protocols established in the 2012 Staff Report. Evidence of owl activity may include presence of owls themselves, burrows, and owl sign at burrow entrances such as pellets, whitewash or other "ornamentation," feathers, prey remains, etc. If it is evident that burrows are actively being used by burrowing owl, avoidance and preparation of a Burrowing Owl Plan shall be required as outlined in part d and part e of this mitigation measure.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		d) **Avoidance.** Avoidance buffers shall be clearly delineated at a 250-foot radius around all occupied burrows within 400 feet of the disturbance footprint, with posted signs demarcating the avoidance area and by using stakes, flags, and/or rope or cord to minimize the disturbance of burrowing owl habitat. No construction shall occur within the avoidance buffer(s) without the consent of a monitoring biologist. The buffer shall remain in place until it is determined that occupied burrows have been vacated. e) **Burrowing Owl Management Plan.** If burrowing owls are detected, Cal Poly Pomona shall prepare a Burrowing Owl Management Plan that shall be submitted to CDFW for review and approval at least 30 days prior to initiation of ground-disturbing activities. If burrowing owls are detected after ground-disturbing activities have been initiated, CDFW shall be notified in writing and a Burrowing Owl Management Plan shall be submitted to CDFW for review and approval within 2 weeks of detection. Construction activities shall not occur within 400 feet of an active burrow until CDFW approves the Burrowing Owl Management Plan. The Burrowing Owl Management Plan shall include but is not limited to 1) impact assessment that details the number and location of occupied burrow sites and acres of burrowing owl habitat with a qualitative description of the habitat vegetation characteristics that will be impacted; 2) avoidance actions such as proposed buffers and visual barriers; 3) monitoring requirements; and 4) compensatory mitigation actions that will be implemented. f) **Incidental Take and Compensatory Mitigation.** No take of burrowing owl shall occur without prior authorization in the form of an Incidental Take Permit pursuant to California Fish and Game Code Section 2081. Occupied habitat that is temporarily impacted shall be restored to its original construction immediately following the completion of construction. Mitigation for the permanent loss of occupied burrowing owl habitat shall be fulfilled through habitat replacement of equal or better functions and values to those impacted by the project at a minimum 1:1 ratio, or as otherwise determined through the Incidental Take Permit	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		process. Mitigation shall be achieved through on-site or off-site conservation of habitat and/or purchase of appropriate credits at a CDFW-approved mitigation bank. 5) **Special-Status Terrestrial Mammals and Reptiles.** For individual projects that could directly or indirectly impact special-status reptile and/or mammal species, including San Diego desert woodrat (*Neotoma lepida intermedia*), Southern California legless lizard (*Anniella stebbinsi*), San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*), red diamondback rattlesnake (*Crotalus ruber*), Blainville's horned lizard (*Phrynosoma blainvillii*), and/or coast patch-nosed snake (*Salvadora hexalepis virgultea*), a Special-Status Wildlife Survey and Relocation Plan shall be developed and submitted to Cal Poly Pomona for review and approval prior to the start of construction. The plan shall include requirements for pre-construction surveys for these species; identify timing, frequency, and locations where surveys should be conducted; and describe methods for trapping and relocating individuals that could be directly or indirectly impacted during construction. Prior to the pre-construction survey, the contractor, under the direction of a qualified biologist, shall install wildlife exclusion fencing to prevent special-status terrestrial mammals and reptiles from entering the work area. The wildlife exclusion fencing must be trenched into the soil at least 4 inches in depth, with the soil compacted against both sides of the fence for its entire length and must have intermittent exit points. Turnarounds shall be installed at access points to direct amphibians and reptiles away from gaps in the fencing. A biological monitor shall inspect exclusion fencing on a regular basis and coordinate with the contractor to repair any damaged or failing sections. The pre-construction survey shall be conducted no more than 48 hours prior to the initiation of ground disturbance and shall be repeated before ground-disturbing activities begin on the first day of construction. The pre-construction survey shall include all suitable habitat within the excluded area or within 50 feet of the proposed disturbance footprint if installation of exclusion fencing is not feasible. Special-status reptiles shall be captured and relocated, in accordance with methods described in the relocation plan, to suitable habitat within the open space areas north and west of the Cal Poly	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		Pomona core campus, outside of the excluded area, which shall be described in the relocation plan. To the extent feasible, impacts to San Diego desert woodrat middens shall be avoided and exclusion fencing shall be located to ensure woodrats cannot enter the work area. The relocation plan shall describe methods for woodrat relocation, to be employed in instances where midden avoidance is not possible, which may include relocation of the middens as well as woodrat individuals. Suitable habitat for special-status reptile and mammal species that is temporarily impacted during construction of individual projects shall be restored to its original condition. Cal Poly Pomona shall prepare and implement a conceptual restoration plan detailing the methods of revegetation, success criteria, and monitoring and maintenance requirements to ensure mitigation success. The permanent loss of suitable habitat shall be mitigated through 1:1 habitat replacement of equal or better functions and values to those impacted by the project. Mitigation shall be achieved through on-site or off-site conservation of habitat and/or purchase of appropriate credits at an approved mitigation bank. 6) Bat Surveys and Roost Avoidance and Exclusion. Prior to construction activities that could disturb potential bat roost sites, including tree trimming or removal and the demolition of existing structures, a qualified biologist shall conduct a pre-construction survey for roosting bats to determine if existing or potential maternity roosts are present on site. If no roost sites are identified, no additional measures shall be required to avoid impacts to bat species. If bats are observed roosting, or potential roost sites are identified, in areas that may be disturbed, the following measures shall be implemented prior to the maternity roosting season to reduce the potential impact to special-status and common bat species. a) Maternity Roosting Season Avoidance. All proposed construction activities that could impact potential or known maternity roost sites, as determined by a qualified bat biologist, including bat roost exclusion, shall occur outside of the general bat maternity roosting season of March through August. Prior to the removal or disturbance of a potential or known maternity roost site, bats shall be excluded from the roost site,	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		after which the roost site can be removed. Items 2 and 3, below, shall be required to ensure no impacts occur to roosting bats during the exclusion process. b) **Replacement Roost Installation.** If there is a potential or known maternity roost within a structure to be demolished or vegetation to be removed or disturbed and suitable alternative roost sites are not present in the vicinity, as determined by the bat biologist, a replacement roost shall be installed. Replacement roost installation shall occur outside of the maternity roosting season. At least 1 month prior to the exclusion of bats from a roost, the biologist shall procure and install bat boxes from a reputable vendor, such as Bat Conservation and Management, to allow bats sufficient time to acclimate to a new potential roost location. The bat boxes shall be installed within close proximity to the existing roost site and in an area that is within close proximity to suitable foraging habitat. Additionally, the bat boxes shall be oriented to the south or southwest, and the area chosen for the bat boxes must receive sufficient sunlight (at least 6 hours) to allow the bat boxes to reach an optimum internal temperature (approximately 90°F) to mimic the existing bat roost. The bat boxes shall be suitable for the bat species present on site and large enough to contain a minimum of 50 bats (e.g., Four Chamber Premium Bat House or Bat Bunker Plus). The bat boxes shall be installed on a minimum 20-foot-tall steel pole and under the guidance of the bat biologist. c) **Roost Exclusion.** Bats shall be excluded from known and potential roost sites that could be impacted during construction. Roost exclusion shall occur outside of the maternity roosting season, during the time when bats are most active (early spring or fall). The primary exit points for roosting bats shall be identified, and all secondary ingress/egress locations shall be covered with a tarp, wood planks, or other methods, as directed by the bat biologist, to prevent bats from leaving from other locations. The primary exit point shall remain uncovered to allow exclusion devices to be installed. Exclusion devices may consist of a screen (poly netting, window screen, or fiberglass screening), foam,	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		wood, or backer rods installed at the primary exit point, so bats are not able to return to the roost after emerging. The exclusion devices shall be installed under the direction of the bat biologist and shall be installed at night to increase the potential that bats are not in the roost. Once it is confirmed by the bat biologist that all primary and secondary exit/entrance points have been covered and the exclusion devices are properly in place, a 1-week exclusion period shall commence. A passive acoustic monitoring detector shall be deployed during the 1-week exclusion period in order to monitor if bat activity has decreased during the exclusion period. Periodic monitoring (1 or 2 evenings) by the bat biologist during the exclusion period should also be conducted to observe if any bats are still emerging from additional areas within the structure or tree to be removed. On the final night of the exclusion period, an active monitoring survey should be conducted to ensure that no bats are emerging from the structure or tree and to confirm that exclusion has been successful. Continued presence of bats at roost site that is to be removed shall require an adjustment to the exclusion devices and schedule. The exclusion devices shall remain in place until the start of removal activities. After the initial bat survey, if any additional roost sites are identified, additional exclusion shall be required and follow the same methodology described in this mitigation measure. MM-BIO-3: Nesting Bird Avoidance. Construction activities that could directly or indirectly impact nesting birds, as determined by a qualified biologist, including loggerhead shrike, yellow warbler, and white-tailed kite, as well as birds protected under the Migratory Bird Treaty Act and/or California Fish and Game Code, shall be conducted outside of the typical breeding season of February 1–September 15 (January 1–June 30 for nesting raptors). If the breeding season cannot be avoided, a pre-construction survey for nesting birds shall be conducted within the proposed disturbance limits, plus a 500-foot buffer, no more than 72 hours prior to construction. Pre-construction nesting bird surveys shall be conducted by a qualified biologist and shall be repeated if there is a pause in construction activities lasting more than 3 days.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		If an active bird nest is determined to be present within the survey area, a qualified biologist shall delineate an appropriate buffer around the nest, within which construction activities shall be avoided until the nest is no longer active, as determined by a qualified biologist. The size of the avoidance buffer shall be determined by the qualified biologist based on the sensitivity of the species, location of the nest, and nature of construction activities. The location of the nest and the avoidance buffer shall be depicted on the construction plans and the information provided to the construction supervisor and any personnel working near the buffer. A qualified biologist shall monitor active nests near construction activities for signs of disturbance and shall adjust the size of any avoidance buffers if needed to avoid disturbance to breeding activities of special-status birds or birds protected under the Migratory Bird Treaty Act and/or California Fish and Game Code. Suitable habitat for special-status bird species that is temporarily impacted during construction of individual projects shall be restored to its original condition. Cal Poly Pomona shall prepare and implement a conceptual restoration plan detailing the methods of revegetation, success criteria, and monitoring and maintenance requirements to ensure mitigation success. The permanent loss of suitable habitat shall be mitigated through 1:1 habitat replacement of equal or better functions and values to those impacted by the project. Mitigation shall be achieved through on-site or off-site conservation of habitat and/or purchase of appropriate credits at an approved mitigation bank MM-BIO-4: Biological Monitoring. For individual projects that could directly or indirectly impact special-status plant or wildlife species, special-status species' habitat, birds protected under the Migratory Bird Treaty Act and/or California Fish and Game Code, or sensitive vegetation communities, as determined by a qualified biologist, a biological monitor shall be present to monitor initial ground-disturbing activities and ensure compliance with all mitigation measures. The biological monitor shall: (1) be knowledgeable and experienced in the biology and natural history of local plant and wildlife resources; (2) be able to identify resources that are or have the potential to be present on the project site; and (3) have previous biological monitoring experience on construction projects.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		MM-BIO-5: Worker Education and Awareness Program (WEAP). For individual projects that could directly or indirectly impact special-status plant or wildlife species, special-status species' habitat, or sensitive vegetation communities, as determined by a qualified biologist, prior to initial ground disturbance, all personnel associated with those activities shall attend a worker education and awareness program (WEAP) conducted by a qualified biologist. In general, the WEAP shall discuss any potentially occurring sensitive biological resources in the area and potential construction-related impacts, protection measures, and project limits. Legal protections and regulations pertinent to the biological resources that may be present shall also be included in the program. A species and habitat fact sheet shall be developed prior to the training program and distributed at the training program to all contractors, employers and other personnel involved with the construction of the project. MM-BIO-6: Demarcation of Disturbance Limits. Prior to ground disturbance for each individual project, the limits of disturbance shall be clearly demarcated using high-visibility construction fencing to prevent inadvertent disturbance to sensitive biological resources. The fencing shall be maintained throughout the duration of all construction activities. MM-BIO-7: Open Space Protection. To minimize the potential for indirect impacts to biological resources in the Voorhis Ecological Reserve and adjacent open space areas, the following measures shall be implemented. A. **Access Controls and Signage.** Cal Poly Pomona shall conduct an assessment to identify necessary access controls and to minimize the potential impacts associated with increased usage of open space areas. In some cases, structures such as permanent fencing may be required to control access into open space areas. The assessment shall be submitted to Cal Poly Pomona for review and approval prior to development. Educational signage and materials shall be created by a qualified biologist to enhance public awareness among students, faculty, and visitors to campus about the sensitive biological resources contained within the open space and to encourage public behavior that contributes to protecting those resources over the long-term. Signs shall be installed and maintained at trailheads	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		where open space areas meet developed portions of the campus and shall, at a minimum, describe and/or illustrate the importance of the adjacent habitat area and prohibit trespass (where appropriate), motor vehicle entry, dumping of trash or other waste, off-leash pets, collection of plants, and the feeding, capture, or harassment of wildlife. B. Invasive Plant Controls. Cal Poly Pomona shall prepare a comprehensive adaptive landscaping and weed control plan (LWCP). The LWCP shall be implemented within the landscaped areas of Master Plan projects to minimize weed invasion into open space areas. The LWCP shall be submitted to Cal Poly Pomona for review and approval prior to development and shall include, at a minimum, the following: a) Weed control treatments shall include legally permitted herbicide, manual, and mechanical methods approved for application. The application of herbicides shall comply with state and federal laws and regulations under the prescription of a Pest Control Advisor and shall be implemented by a Licensed Qualified Applicator. Herbicides shall not be applied during or within 72 hours of a forecasted measurable rain event or during high wind conditions (greater than 7 miles per hour) that could cause spray drift onto native vegetation. Where manual or mechanical methods are used, plant debris shall be disposed of at an appropriate off-site location. The timing of the weed control treatment shall be determined for each plant species with the goal of controlling populations before they start producing seeds. b) Invasive plant species (California Invasive Plant Council moderate and high ratings) that could establish in open space areas shall not be included in landscaping plans. c) All seeds and straw materials used during project construction and operation shall be weed-free rice straw or other weed-free product, and all gravel and fill material shall be weed free. If straw wattles are used, they shall not be encased in plastic mesh. All plant materials used during restoration shall be native, certified weed free, and approved by Cal Poly Pomona.	

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Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		d) Prior to entry to the project site for the first time, equipment must be free of soil and debris on tires, wheel wells, vehicle undercarriages, and other surfaces (a high-pressure washer and/or compressed air may be used to ensure that soil and debris are completely removed). Compliance with the provision is achieved by on-site inspection and verification or by demonstrating that the vehicle or equipment has been cleaned at a commercial vehicle or appropriate truck washing facility. In addition, the interior of equipment (cabs, etc.) shall be free of mud, soil, gravel, and other debris (interiors may be vacuumed or washed). C. **Lighting Controls.** Construction activities shall be limited to the time between dawn and dusk. If construction activity must occur outside of these time constraints, down shielding or directional lighting shall be used to minimize light spill into adjacent areas. Outdoor development-related lighting shall be low-intensity, downcast luminaries with light patterns directed away from open space areas to minimize night illumination of adjacent wildlife habitat.	
Impact 4.4-2: The project could have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.	Potentially Significant	MM-BIO-2: Sensitive Vegetation Communities Protection and Replacement. Sensitive vegetation communities that may be directly or indirectly impacted during individual project implementation, as determined by a qualified biologist, shall be demarcated using a Global Positioning System with submeter accuracy and flagged in the field with high-visibility tape or similar. Direct impacts to sensitive vegetation communities shall be avoided and a qualified biologist shall delineate an appropriate avoidance buffer around the communities, within which construction activities shall be prohibited to avoid indirect impacts to these resources. A qualified biologist shall recommend construction best management practices required to avoid or minimize indirect impacts to sensitive vegetation communities near construction activities. Best Management Practices could include but are not limited to temporary soil stabilization and erosion controls, water trucks or similar to control fugitive dust, spill prevention measures such as secondary containment, installation of fiber rolls on exposed slopes, and silt fencing. If avoidance of direct or indirect impacts to sensitive vegetation communities is not feasible, and if the project-specific	Less than significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		analysis determines the impact to be significant absent mitigation, restoration of temporarily impacted areas and compensatory mitigation for permanent impacts shall be required as follows. 1) Sensitive vegetation communities that are temporarily impacted during construction of individual projects shall be restored to their original condition. Cal Poly Pomona shall prepare and implement a conceptual restoration plan detailing the methods of revegetation, success criteria, and monitoring and maintenance requirements to ensure mitigation success. 2) The permanent loss of sensitive vegetation communities during construction shall be mitigated at a minimum 1:1 ratio, with the final required mitigation ratio to consider acreage, functions, and values of the impacted community and the mitigation lands. Mitigation shall be achieved through on-site or off-site conservation of habitat and/or purchase of appropriate credits at an approved mitigation bank. For all conserved lands, a Conservation Management Plan shall be prepared by a qualified botanist and reviewed and approved by Cal Poly Pomona prior to individual project implementation. The plan shall include, at a minimum: a) Detailed methods of preservation, enhancement, rehabilitation, and/or propagation and planting shall be described, as appropriate b) Success criteria and long-term monitoring and management requirements to ensure mitigation success c) Adaptive management and remedial measures in the event that success criteria are not achieved d) Responsible parties and funding sources shall be identified for any mitigation lands required to be conserved in perpetuity Additionally, implement MM-BIO-4, MM-BIO-5, MM-BIO-6, MM-BIO-7(A), and MM-BIO-7(B). (See Impact 4.4-1 for details of these mitigation measures.)	
Impact 4.4-3: The project could have a substantial adverse effect on state or federally protected wetlands (including,	Potentially Significant	MM-BIO-8: Aquatic Resource Permitting and Mitigation. For individual projects that may directly or indirectly impact jurisdictional aquatic resources, as determined by a qualified biologist, prior to the start of construction, Cal Poly Pomona shall coordinate with the USACE, Los Angeles RWQCB (Region 4), and	Less than Significant

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Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.		CDFW to ensure regulatory compliance related to jurisdictional aquatic resources and obtain any necessary permits and/or agreements pursuant to Sections 401 and 404 of the federal Clean Water Act (CWA), the Porter–Cologne Water Quality Control Act (waste discharge requirement), and California Fish and Game Code Section 1602. Mitigation for impacts to jurisdictional resources shall be at a minimum 1:1 ratio, to offset the loss of beneficial uses, functions, and values and ensure no net loss of aquatic resources. Mitigation shall be completed through: (1) the purchase of credits at an approved mitigation bank; or (2) other mitigation developed by Cal Poly Pomona. Final mitigation ratios and credits, if applicable, shall be determined in consultation with the USACE, RWQCB and/or CDFW based on agency evaluation of current resource functions and values and through each agency's respective permitting process. If mitigation is proposed outside of an approved mitigation bank by Cal Poly Pomona (Option 2 above), a Habitat Mitigation and Monitoring Plan (HMMP) shall be prepared and approved by the regulatory agencies. The HMMP shall include a conceptual planting plan including planting zones, grading, and irrigation, as applicable; a conceptual planting palette; a long-term maintenance and monitoring plan; annual reporting requirements; and proposed success criteria. Best management practices shall be implemented to avoid any indirect impacts on jurisdictional waters, including the following: ▪ Vehicles and equipment shall not be operated in ponded or flowing water except as described in permits. ▪ Water containing mud, silt, or other pollutants from grading or other activities shall not be allowed to enter jurisdictional waters or be placed in locations that may be subjected to high storm flows. ▪ Spoil sites shall not be located within 30 feet from the boundaries of jurisdictional waters or in locations that may be subject to high storm flows, where spoils might be washed back into drainages.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		▪ Raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances that could be hazardous to vegetation or wildlife resources resulting from project-related activities shall be prevented from contaminating the soil and/or entering avoided jurisdictional waters. ▪ No equipment maintenance shall be performed within 100 feet of jurisdictional waters, including wetlands and riparian areas, where petroleum products or other pollutants from the equipment may enter these areas. Fueling of equipment shall not occur on the project site. Additionally, implement MM-BIO-4, MM-BIO-5, MM-BIO-6, MM-BIO-7A, and MM-BIO-7B. (See Impact 4.4-1 for details of these mitigation measures.)	
Impact 4.4-4: The project could interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	Potentially Significant	Implement MM-BIO-1(6), MM-BIO-4, MM-BIO-5, MM-BIO-7(A), MM-BIO-7(B), and MM-BIO-7(C). (See Impact 4.4-1 for details of these mitigation measures.)	Less than Significant
Impact 4.4-5: The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to biological resources.	Less than Significant	Implement MM-BIO-1, MM-BIO-2, MM-BIO-3, MM-BIO-4, MM-BIO-5, MM-BIO-7(A), MM-BIO-7(B), and MM-BIO-7(C). (See Impact 4.4-1, Impact 4.4-2, and Impact 4.4-3 for details of these mitigation measures.)	Less than Significant
4.5 Cultural Resources – Archaeological Resources			
Impact 4.5-1: The project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section15064.5.	Potentially Significant	MM-CUL-1: Additional Cultural Resources Inventory Efforts. Prior to the initiation of ground-disturbing activities for proposed Master Plan projects located outside the archaeological area of potential impacts (API) as presently mapped (Figure 4.5-1), performance standards for identifying and assessing the impacts of the subject project(s) on cultural resources must be met. This shall initiate with a cultural resources inventory, overseen by a qualified archaeologist	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology (principal investigator). The cultural resources inventory shall, at a minimum, include the results of the following: 1. If existing data is more than 5 years old, a California Historical Resources Information System (CHRIS) records search at the South Central Coastal Information Center (SCCIC) 2. A Sacred Lands File search with the Native American Heritage Commission (NAHC) and engagement with Consulting Tribes (as identified through government-to-government consultation conducted in support of the present EIR) 3. A pedestrian survey meeting best practice standards of areas not previously subject to intensive-level survey in the last 10 years 4. Preparation of a cultural resources inventory report, even if no resources are identified. All reports should be maintained on-file with Cal Poly Pomona and submitted to the SCCIC If any cultural resources (archaeological or built environment elements more than 45 years in age) are identified during the cultural resources inventory studies, the potential for avoidance should be the primary consideration. An appropriate buffer for avoidance is typically 100 feet, which may be adjusted at the recommendation of the principal investigator, so that the exclusion buffer allows key activities to proceed while ensuring that no ongoing project activities will affect the find. If it is determined that avoidance is unfeasible, a significance evaluation shall be completed in order to determine the significance of the resource as outlined by the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; California Public Resources Code Section 21082). No project activities shall be permitted in the vicinity of the resource until the significance of the resource is assessed by the principal investigator with concurrence by Cal Poly Pomona. If the resource is of Native American origin, Consulting Tribes shall be given the opportunity to provide input on evaluation strategies prior to implementation and findings. Where approved, archaeological resources with potential to support buried archaeological deposits shall be evaluated by the principal investigator through an archaeological testing phase that consists of	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		systematic excavations of a sample of areas within the proposed project area to determine the integrity of the archaeological deposits, the horizontal and vertical extent of the deposits, the quantity and diversity of artifacts contained within the deposits, and the potential for human remains. The goal is to avoid or minimize impacts to archaeological resources based on the results of the test excavations. Pursuant to Section 15126.4(b)(3)(A), preservation in place is the preferred manner of mitigating impacts to archaeological resources. However, Section 15126.4(b)(3)(C) also recognizes that data recovery through excavation may be the only feasible mitigation for significant or unique cultural resources at times; therefore, this contingency should be provided for. Any data recovery shall meet best practice standards and shall be supported by a data recovery plan, prepared by the principal investigator, that has been approved by Cal Poly Pomona. Consulting Tribes shall be provided the opportunity to comment on any data recovery plan concerning resources of Native American origin or association. All studies shall be submitted to Cal Poly Pomona for review and approval. Please note that Tribal Cultural Resources (as defined by PRC Section 21074(a)) represent an independent, albeit often related, resource type under CEQA. Impacts to Tribal Cultural Resources are assessed through the process of government-to-government consultation. Should a possible Tribal Cultural Resource be identified, management strategies to address this find shall occur in compliance approved Tribal Cultural Resources mitigation. Feasible measures and management strategies shall also be identified based on the results of the cultural resources studies and as informed by tribal consultation. Assuming no significant or unique cultural resources are identified, MM-CUL-2, MM-CUL-3, and MM-CUL-4 shall be implemented throughout the duration of the subject project. MM-CUL-2: Cultural Resources Sensitivity Training. Cal Poly Pomona shall include a standard clause in every ground-disturbing construction contract for the project that requires cultural resources sensitivity training that may occur as part of a worker environmental awareness program. Prior to the initiation of ground-disturbing activities, construction crews shall be made aware of the potential to encounter cultural resources and the requirement for cultural	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		monitors to be present during these activities. Topics addressed should include definitions and characteristics of cultural resources and Tribal Cultural Resources, regulatory requirements and penalties for intentionally disturbing cultural resources, and protocols to be taken in the event of an inadvertent discovery. MM-CUL-3: Archaeological Monitoring and Inadvertent Discovery Protocols. An archaeological monitor shall be present during all ground-disturbing activities especially those in native soils for the project. Archaeological monitoring may be adjusted (increased, decreased, or discontinued) at the recommendation of an archaeological principal investigator (meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology) and based on inspection of exposed cultural material and the observed potential for soils to contain intact cultural deposits or otherwise significant archaeological material. The archaeological monitor shall have the authority to temporarily halt work to inspect areas for potential cultural material or deposits. In the event that unanticipated archaeological deposits or features are exposed during construction activities, all construction work occurring within 100 feet of the find shall immediately stop until the archaeological principal investigator is provided access to the project area and can assess the significance of the find and determine whether additional study is warranted. The work exclusion buffer may be adjusted as appropriate to allow work to feasibly continue at the recommendation of the archaeological principal investigator. Should it be required, temporary flagging shall be installed around the resource to avoid any disturbance from construction equipment. The potential for avoidance should be the primary consideration of this initial process. The significance of the find shall be assessed as outlined by the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; California Public Resources Code Section 21082). If the archaeological principal investigator observes the discovery to be potentially significant under CEQA, additional efforts, such as the preparation of an archaeological treatment plan, testing, and/or data recovery, are warranted prior to allowing construction to proceed in this area.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		Daily monitoring logs shall be completed by the on-site archaeological monitor. Within 60 days following completion of construction, the archaeological principal investigator shall provide an archaeological monitoring report to Cal Poly Pomona. This report shall include the results of the cultural monitoring program (even if negative), including a summary of any findings or evaluation/data recovery efforts, and supporting documentation that demonstrates that all mitigation measures defined in the environmental document were appropriately met. Appendices shall include archaeological monitoring logs and documentation relating to any newly identified or updated cultural resources. This report shall be submitted to the SCCIC once considered final.	
Impact 4.5-2: The project could disturb any human remains, including those interred outside of dedicated cemeteries.	Potentially Significant	MM-CUL-4: Inadvertent Discovery Protocols for Human Remains. In accordance with Section 7050.5 of the California Health and Safety Code and the requirements of the California Code of Regulations (CCR) Section 15064.5(e), if human remains are found, the Los Angeles County Coroner (County Coroner) shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, The County Coroner shall notify the NAHC in within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify the person or persons it believes to be the Most Likely Descendant (MLD) of the deceased Native American. The MLD shall complete inspection after being granted access to the site and make recommendations for the treatment and disposition, in consultation with Cal Poly Pomona, of the human remains and associated grave goods.	Less than Significant
Impact 4.5-3: The project could result in a cumulatively considerable contribution to significant cumulative impacts related to cultural resources.	Less than Significant	Implement MM-CUL-1, MM-CUL-2, and MM-CUL-3. (See Impact 4.5-1 and Impact 4.5-2 for details of these mitigation measures.)	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
4.6 Cultural Resources – Historic Resources			
Impact 4.6-1: The project could substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	Potentially Significant	MM-HBE-1: Historic Preservation Input to Design Team. For proposed Master Plan projects involving a "major exterior alteration" to a historical resource, impacts to those historical resources shall be reduced through historic preservation input to the design team by a qualified historic preservation professional. For purposes of MM-HBE-1, "major exterior alterations" shall indicate changes to exterior character-defining features, or the setting of a building or structure determined to be a historical resource. Such projects might include, but not be limited to: ▪ Additions ▪ Adjacent new construction ▪ Partial or complete demolition ▪ Relocation ▪ The removal, replacement, obstruction, or destruction of character-defining features, including but not limited to windows (glazing and framing members), wall sheathing materials, architectural detailing and other features that characterize the historic property ▪ Changes to the roof shape, pitch, eaves, and other features ▪ Installment of wheelchair access ramps and other ADA-compliant features ▪ Changes to the overall design configuration and composition of the building and the spatial relationships that define it. For purposes of MM-HBE-1, "minor exterior alterations" shall indicate a minor alteration/change to the exterior of a building or structure and its setting that would not be likely to significantly alter its appearance. Minor exterior alterations to historical resources are exempt from further review from an architectural historian. Such projects involving minor exterior alterations might include, but not be limited to: ▪ Repainting ▪ In-kind landscaping or hardscaping replacement	Significant Unavoidable

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		▪ Reversible installation of HVAC units that do not obstruct or destroy character-defining features ▪ Installation of fencing, signage, or artwork that does not obstruct or destroy character-defining features. For major exterior alterations involving historical resources, the historic preservation professional shall work with the design team to plan and identify options for new construction, upgrades, stabilization, repairs, and rehabilitation that will facilitate compliance with the Secretary's Standards. This input to the design team shall begin in the earliest phases of the design phase (ideally during conceptual design) and extend throughout development of 50% Construction Drawings. This input shall include but not be limited to a site walk with the design team, to gather information on project goals and constraints. For new construction, the historic preservation professional shall work with the design team to identify options and opportunities for: (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, (2) ensuring that new construction, in materials, finishes, design, scale, and appearance, is compatible but differentiated from historic contributors and character-defining features; and (3) ensuring that new construction is designed and sited in such a way that it reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors. For modernization and upgrade projects, the historic preservation professional shall work with the design team to identify project options that facilitate compliance with the Secretary's Standards. The historic preservation professional shall review proposed materials, finishes, window treatments/configuration, and other details to ensure compliance with the Secretary's Standards. The historic preservation professional shall provide specifications for architectural features or materials requiring restoration or removal, maintaining and protecting relevant features in place, or on-site storage. Specifications shall include detailed drawings or instructions where historic features may be impacted. The historic preservation professional shall document the input provided to the design team in Memoranda for the Record at	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		the Schematic and 50% Construction Documents phases. The historic preservation professional shall participate in pre-construction and construction monitoring activities, as appropriate, to facilitate conformance with the Secretary's Standards and/or lessening of material impairment to historical resources. Minimum qualifications standards for the historic preservation professional shall be as follows: the historic preservation professional shall satisfy the Secretary of the Interior's Professional Qualifications Standards for Architectural History and/or Historic Architecture as defined by the National Park Service and in accordance with 36 CFR 61 and possess a minimum of 10 years of project-level experience in designing, developing, and reviewing architectural plans for conformance with the Secretary's Standards. MM-HBE-2: Character-Defining Features and Impacts Screening Memoranda. For projects affecting any eligible historic buildings identified in the 2025 Cal Poly Pomona Master Plan Historical Resources Technical Report or subsequently determined to qualify as a historical resource, Cal Poly Pomona shall implement the following procedures. For major exterior alterations to eligible historic resources, Cal Poly Pomona shall retain a qualified historic preservation professional to prepare a Character-Defining Features and Impacts Screening Memorandum in coordination with the design team. The objective shall be to document and consider project design features and/or measures that would lessen or avoid direct or indirect impacts to the historical resource. Conclusion of the screening consultation process shall be documented in a memorandum, including a statement of compliance with the Secretary's Standards. The purpose of the memorandum shall be to document avoidance/reduction of significant adverse impacts to historical resources, where feasible, through (1) identifying and documenting character-defining features, noncontributing elements/additions, and (2) providing historic preservation project review and preliminary impacts analysis screening to Cal Poly Pomona as early as possible in the design process.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		The memorandum shall include documentation of a review of preliminary and/or conceptual project objectives early in the design process and shall describe various project options capable of reducing and/or avoiding significant adverse direct or indirect impacts through compliance with the Secretary's Standards and/or application of the State Historic Building Code or any subsequent design guidelines prepared by Cal Poly Pomona for the treatment of historic resources. If project details remain conceptual at the time of project review, the Character-Defining Features and Impacts Screening Memorandum shall include design recommendations drawn from the Secretary's Standards that would facilitate compliance and avoid, lessen, or mitigate significant adverse impacts to historical resources. In addition, the Secretary's Standards project review shall include a section assessing the potential direct and indirect impacts of the proposed project on the historical resource, whether an individual resource or historic district/cultural landscape. Minimum qualifications standards for the preparer of the Character-Defining Features and Impacts Screening Memoranda shall be as follows: the historic preservation professional shall satisfy the Secretary of the Interior's Professional Qualifications Standards for History and/or Architectural History as defined by the National Park Service and in accordance with 36 CFR 61 and possess a minimum of ten (10) years of project-level experience in CEQA review of historic resources and reviewing architectural plans for conformance with the Secretary's Standards. MM-HBE-3: Historical Resource Evaluation of Properties Not Previously Surveyed. For a building, structure, or designed landscape feature on the main campus that 1) is 45 years old or older at the time it is proposed for alteration, and 2) was not evaluated as part of the 2025 Cal Poly Pomona Master Plan Historical Resources Technical Report, before carrying out a "major exterior alteration," Cal Poly Pomona shall retain a qualified historic preservation professional to complete a focused Eligibility Screening Memo to determine the historical resource status of the property. The Eligibility Screening Memo shall gather the substantial evidence necessary to apply the relevant significance criteria and determine the status of the property; this evidence shall include but not necessarily be limited to	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		property-specific research, brief biographical sketches of design professionals involved in its construction, and changes/additions over time. The historic context prepared in the 2025 Cal Poly Pomona Master Plan Historic Resources Technical Report will be utilized to the maximum extent practicable to streamline the effort. The Eligibility Screening Memo will draw on a desktop review of site photos provided by Cal Poly Pomona; no site visit will be required. Properties appearing to meet eligibility criteria as a result of the Eligibility Screening Memo will be carried forward for intensive-level documentation in a due-diligence Historical Resource Evaluation Report (HRER). The HRER shall include an in-person site visit by a qualified preservation professional, during which the property's existing conditions, features, and alterations over time will be documented in detailed field notes and digital photographs. The evaluation shall consider buildings, structures, objects, sites, historic districts, and potential cultural landscapes and shall identify the character-defining features of such resources and other required information on the appropriate Department of Parks and Recreation (DPR) 523 Record Forms, which shall be appended to the evaluation. The level of documentation for each evaluation shall comply with Public Resources Code Section 5024 and 5024.5 with respect to state-owned historical resources. For resources determined through this evaluation process to meet National Register of Historic Places/California Register of Historical Resources and/or California Historical Landmark criteria, MM-HBE-1 and MM-HBE-2 shall be required as early as possible in the project planning and design phase. If the resource was the subject of a historic resources evaluation meeting the standards of Public Resources Code Section 5024 and 5024.5 within the last 5 years, MM-HBE-3 shall not be required; resources that are the subject of an evaluation older than 5 years may require re-evaluation. For buildings, structures, objects, sites, historic districts, cultural landscapes, and other resources determined through this evaluation process not to meet National Register of Historic Places/California Register of Historical Resources and/or California Historical Landmark criteria, no further mitigation is required.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		Minimum qualifications standards for the preparer of the Project-Specific Historical Resource Evaluation shall be as follows: the historic preservation professional shall satisfy the Secretary of the Interior's Professional Qualifications Standards for History and/or Architectural History as defined by the National Park Service and in accordance with 36 CFR 61 and possess a minimum of ten (10) years of project-level experience in California Environmental Quality Act review of historical resources and reviewing architectural plans for conformance with the Secretary's Standards. MM-HBE-4: HABS-Like Documentation Package. If major exterior alterations, renovations, or relocation of a determined historic resource are proposed and the project does not comply with the Secretary's Standards, or in the event that preservation or reuse of a historical resource are not feasible, the historical building shall be documented in a Historic American Buildings Survey (HABS)-like documentation package. The HABS-like documentation of the building, structure, district, feature, and its associated landscaping and setting shall be commissioned prior to construction activities. The HABS-like package will document in photographs and descriptive and historical narrative the historical resources slated for modification/demolition. Documentation prepared for the package will draw upon primary and secondary-source research and available studies previously prepared for the project. The specifications for the HABS-like package follow: ▪ Photographs: Photographic documentation will focus on the historical resources/features slated for demolition, with overview and context photographs for the campus and adjacent setting. Photographs will be taken of the building using a professional-quality single lens reflex (SLR) digital camera with a minimum resolution of 10 megapixels. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be provided in electronic format.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		▪ Descriptive and Historical Narrative: The architectural historian will prepare descriptive and historical narrative of the historical resources/features slated for demolition. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs, and information on how the resource fits within the broader campus during its period of significance. The historical narrative will include available information on the campus design, history, architect/contractor/designer as appropriate, area history, and historical context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate. ▪ Historic Documentation Package Submittal: The electronic package will be assembled by the architectural historian and submitted to Cal Poly Pomona for review and comment. ▪ A copy of the HABS-like package shall be offered to the Cal Poly Pomona Special Collections and Archives. The record shall be accompanied by a report containing site-specific history and appropriate contextual information. This information shall be gathered through site-specific and comparative archival research, and oral history collection as appropriate. Minimum qualifications standards for the preparer of the HABS-like Documentation Package shall be as follows: the historic preservation professional shall satisfy the Secretary of the Interior's Professional Qualifications Standards for History and/or Architectural History as defined by the National Park Service and in accordance with 36 CFR 61 and possess a minimum of ten (10) years of project-level experience in CEQA review of historical resources and reviewing architectural plans for conformance with the Secretary's Standards. MM-HBE-5: PRC-Required SHPO Consultation. For state-owned historical resources, PRC Sections 5024 and 5024.5 require State Historic Preservation Officer (SHPO) consultation for proposed projects that might impact historical resources eligible for the National Register of Historic Places, California Register of Historical Resources or as a California Historical Landmarks. These sections of	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		the Public Resources Code are designed to give SHPO the opportunity to review and comment on historical resource determinations and proposed projects that might affect such historical resources. Cal Poly Pomona shall consult with SHPO regarding the potential alteration or demolition of any buildings, structures, objects, sites, historic districts, cultural landscapes, or other campus features that appear eligible for listing in the National Register of Historic Places, the California Register of Historical Resources or as California Historical Landmarks, as documented through survey or evaluation. Such consultation shall be completed pursuant to California PRC Sections 5024 and 5024.5 and related guidance published by SHPO. Retention of qualified historic preservation professional may be necessary to assist in SHPO consultation and to compile the required documentation and consultation materials in compliance with PRC Sections 5024 and 5024.5 and related guidance published by SHPO. This shall include a formal request for consultation, all required materials as specified in each mitigation measure, and any other background materials that might be requested by SHPO. Minimum qualifications standards shall be as follows: the historic preservation professional shall satisfy the Secretary of the Interior's Professional Qualifications Standards for History and/or Architectural History as defined by the National Park Service and in accordance with 36 CFR 61 and possess a minimum of ten (10) years of project-level experience in CEQA review of historical resources and reviewing architectural plans for conformance with the Secretary's Standards.	
Impact 4.6-2: The project could result in a cumulatively considerable contribution to significant cumulative impacts related to cultural resources.	Less than Significant	Mitigation not required.	Less than Significant
4.7 Energy			
Impact 4.7-1: The project would not result in a potentially	Less than Significant	Mitigation not required.	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.			
Impact 4.7-2: The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.7-3: The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to energy.	Less than Significant	Mitigation not required.	Less than Significant
4.8 Geology and Soils			
Impact 4.8-1: The project would not directly or indirectly cause potential adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking and seismic-related ground failure (including liquefaction and landslides).	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.8-2: The project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and would	Less than Significant	Mitigation not required.	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
not potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.			
Impact 4.8-3: The project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994) and therefore would not create substantial direct or indirect risks to life or property.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.8-4: The project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Potentially Significant	MM-GEO-1: Paleontological Resources Mitigation. Prior to commencement of any ground disturbance (e.g., grading, boring, excavation, digging, trenching, rig anchor installation, drilling, tunneling, auguring, and blasting) that could impact undisturbed native sediments with high paleontological sensitivity, Cal Poly Pomona shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) (2010) guidelines to determine the potential for encountering deposits of paleontological interest. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the project. The PRIMP shall be consistent with the SVP (2010) guidelines and should outline requirements for pre-construction meeting attendance and worker environmental awareness training; where monitoring is required within the project site based on construction plans and/or geotechnical reports; procedures for adequate paleontological monitoring and discoveries treatment; and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. The qualified paleontologist shall attend the pre-construction meeting, and a qualified paleontological monitor shall be on-site during all rough grading and other significant ground-disturbing activities (including augering) in previously undisturbed, fine-grained Pleistocene alluvial deposits, the Miocene Monterey (Puente) Formation, and the Miocene Topanga Formation. Paleontological monitoring shall occur below a depth of 5 feet below the ground surface in areas mapped as Holocene alluvial deposits and from the surface in areas mapped as the Miocene Monterey (Puente) Formation and Miocene	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		Topanga Formation. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will remove the rope and allow grading to recommence in the area of the find. Costs for laboratory processing of fossil specimens and curation fees at the museum are the responsibility of Cal Poly Pomona.	
Impact 4.8-5: The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to geology, soils, or paleontological resources.	Less than Significant	Implement MM-GEO-1. (See Impact 4.8-4 for details of this mitigation measure.)	Less than Significant
4.9 Greenhouse Gas Emissions			
Impact 4.9-1: The project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.9-2: The project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.9-3: The project would not result in a cumulatively considerable contribution to significant cumulative impacts	Less than Significant	Mitigation not required.	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
related to greenhouse gas emissions.			
4.10 Hazards and Hazardous Materials			
Impact 4.10-1: The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.10-2: The project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, including due to the project being located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.	Potentially Significant	MM-HAZ-1: Underground Storage Tank (UST) Inventory and Soil Management Plan (SMP). Prior to any demolition or construction activities, the location of all potentially affected current and former USTs shall be determined and mapped, including the former leaking underground storage tank (LUST) site. The locations and status of all current and former USTs will be documented on a UST inventory. The inventory shall be consulted for all projects proposed as part of the Master Plan. For projects that will result in demolition, construction, or earth moving activities within proximity of a current or former UST such that the UST or appurtenances may be damaged, changed, or otherwise impacted, the demolition, renovation, or construction plans will include protective measures to ensure USTs, piping, fill ports, or other associated features will not be damaged. Any changes to the UST or associated features will be completed in accordance with state and local rules and regulations, and permits will be acquired in accordance with Los Angeles County Fire Department, as they regulate USTs under state regulations. For projects that will result in demolition, construction, or earth moving activities within proximity of a current or former UST, a soil management plan (SMP) will be prepared that outlines actions and responses should contaminated soils be identified. Should soil contamination or previously undocumented USTs be identified during construction activities associated with other projects, earth moving activities will pause until a SMP can be developed. The SMP shall be prepared by a qualified environmental consultant that	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		outlines the proper screening, handling, characterization, transportation, and disposal procedures for contaminated soils, should they be encountered in construction near UST sites. The SMP shall include health and safety and training procedures for workers who may come in contact with contaminated soils. The SMP shall also include procedures for the identification and proper abandonment of underground storage tanks, should any be identified during demolition and construction activities that were previously not identified in the UST inventory. The SMP shall include all applicable federal, state, and local regulations associated with handling, excavating, and disposing of contaminated soils; procedures for getting authorization for disposal of contaminated soils; and appropriate procedures, notifications, permitting requirements, handling, and disposal requirements for decommissioning any USTs. The SMP shall be implemented by Cal Poly Pomona or their designated contractor for all construction, demolition, or renovation activities that involve earthwork that may occur near a current or former UST.	
Impact 4.10-3: The project could emit hazardous emissions or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Potentially Significant	Implement MM-HAZ-1. (See Impact 4.8-1 for details of this mitigation measure.)	Less than Significant
Impact 4.10-4: The project would not result in a safety hazard or excessive noise associated with airport noise for people residing or working in the project area.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.10-5: The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Less than Significant	Mitigation not required.	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
Impact 4.10-6: The project could (1) expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, or (2) exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, due to slope, prevailing winds, and other factors.	Potentially Significant	MM-HAZ-2: Construction Fire Prevention Plan. Prior to the commencement of construction activities, Cal Poly Pomona shall prepare a construction fire protection plan (CFPP) that shall apply to the northern and northwestern portions of the main campus, located in the Very High Fire Hazard Severity Zone. The CFPP shall require the training of construction personnel and details related to fire-suppression procedures and equipment to be used on site during construction. Cal Poly Pomona shall include the CFPP in construction specifications and contracts for projects in the specified locations. The CFPP shall be consistent with the requirements in California Building Code Chapter 33 and California Fire Code Chapter 33, and shall include the following: ▪ Protocols for conducting mandatory project-specific environmental awareness training for all on-site construction workers, including the requirement to conduct the training prior to any grubbing or ground disturbance, and requirements for ongoing training to occur prior to commencement of each phase of construction. ▪ Requirements to conduct and document construction worker trainings, which shall include protocols for minimizing potential ignition activities, vegetation clearing, parking requirements/restrictions, equipment/vehicle idling restrictions, smoking restrictions, initial attack firefighting, proper use of gas-powered equipment and storage of flammable fuels, use of spark arrestors, fire reporting, and hot work restrictions. ▪ Identification of construction work restrictions during red flag warnings and high to extreme fire danger days. ▪ Specifications for access to adequate water supplies and/or water trucks to service construction activities. ▪ Documentation of emergency contact information and protocols for on-site emergency response communication to on-site workers, coordination with Los Angeles County Fire Department and other local agencies, and reporting/documentation procedures for actions taken.	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		▪ Designation of an on-site fire awareness coordinator with an itemized description of their role and responsibility for ensuring compliance with the construction FPP, including demonstration of compliance with applicable plans and policies established by state and local agencies and documentation of completion of required construction worker trainings. MM-HAZ-3: Construction Fire Prevention Measures. Prior to the execution of any contract with a construction contractor and prior to the onset of grading, Cal Poly Pomona shall ensure that the following requirements are included in the construction contractor's contract specifications: ▪ All required fuel modification for each phase of construction activity shall be implemented prior to commencement of that phase and prior to combustible building materials being delivered to the site. ▪ Prior to bringing lumber onto a project site, improvements within proximity to the active development area shall be in place, including temporary or permanent utilities, operable fire hydrants, an approved, temporary roadway surface, and fuel modification established pursuant to California Public Resources Code Section 4291. ▪ All temporary construction power lines shall only be allowed in areas that have been cleared of combustible vegetation.	
Impact 4.10-7: The project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.10-8: The project would not expose people or	Less than Significant	Mitigation not required.	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.			
Impact 4.10-9: The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to hazards and hazardous materials.	Less than Significant	Implement MM-HAZ-1, MM-HAZ-2, and MM-HAZ-3. (See Impact 4.10-2 and Impact 4.10-6 for details of these mitigation measures.)	Less than Significant
4.11 Hydrology and Water Quality			
Impact 4.11-1: The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.11-3: The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would (i) result in substantial erosion or siltation on or off site, (ii) substantially increase the rate or amount of surface runoff in a	Less than Significant	Mitigation not required.	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
manner which would result in flooding on or off site, or (iii) increase or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.			
Impact 4.11-4: The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.11-5: The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to hydrology and water quality	Less than Significant	Mitigation not required.	Less than Significant
4.12 Land Use and Planning			
Impact 4.12-1: The project would not physically divide an established community	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.12-2: The project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	Less than Significant	Mitigation not required.	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
Impact 4.12-3: The project would not result in a cumulatively significant impact related to land use and planning.	Less than Significant	Mitigation not required.	Less than Significant
4.13 Noise			
Impact 4.13-1: The project could result in generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; however, the project would not result in a substantial permanent increase in ambient noise levels.	Potentially Significant	MM-NOI-1: Construction Noise Measures. Cal Poly Pomona shall require that construction contractors implement the following practices and measures: ▪ Construction activity shall generally be limited to the daytime hours between 7:00 a.m. and 7:00 p.m. on weekdays and between 8:00 a.m. and 8:00 p.m. on weekends and holidays. If nighttime construction is required, noise levels shall not exceed 65 dB L_{max} (slow response) when measured at the construction site boundary between the hours of 7:00 p.m. and 7:00 a.m. Loud construction activity (e.g., asphalt removal, large-scale grading operations) shall not be scheduled during finals week and preferably will be scheduled during holidays, summer/winter break, etc. ▪ All construction equipment shall be properly maintained and equipped with noise-reducing air intakes, exhaust mufflers, and engine shrouds in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation. ▪ Electrical power, rather than diesel equipment, shall be used to run compressors and similar power tools and to power any temporary structures, such as construction trailers. ▪ All stationary construction equipment (e.g., electrical generators, pumps, refrigeration units, and air compressors) and equipment staging areas shall be located as far as feasible from occupied residences or educational land uses. ▪ When anticipated construction activities are expected to occur less than 175 feet from an existing on-campus or off-campus residential land use, one or more of the following techniques shall be employed to keep noise levels below an eight-hour A-weighted energy-equivalent level (L_{eq8h}) of 80 dBA at the potentially affected sensitive receptors:	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		▪ Reduce construction equipment and vehicle idling and active operation duration. ▪ Install or erect on site a temporary, solid noise wall (or acoustical blanket having sufficient mass, such as the incorporation of a mass-loaded vinyl skin or septum) of adequate height and horizontal extent so that it linearly occludes the direct sound path between the noise-producing construction process(es) or equipment and the sensitive receptor(s) of concern. ▪ Where impact-type equipment is anticipated on site, apply noise-attenuating shields, shrouds, portable barriers or enclosures, to reduce the magnitudes of generated impulse noises. MM-NOI-2: Athletic Facilities Noise Measures. Cal Poly Pomona shall require that new or replacement athletic facilities implement the following design measures: ▪ New or replacement athletic facilities intended to host outdoor athletic events, including but not limited to the Soccer Field and Kellogg Stadium Replacement, Softball Facility, and Recreational Fields and Support Facilities, shall have an operational noise assessment prepared that quantifies noise levels generated by typical and maximum capacity facility events at noise-sensitive receivers within 1,500 feet of the facility. The assessment shall be prepared by an appropriately qualified acoustical consultant, and shall include any sound control design or measures necessary to avoid a substantial increase in ambient noise levels (a greater than 3 dBA CNEL increase) at noise-sensitive receivers within 1,500 feet of these facilities. The following features have been demonstrated to be effective for athletic facility noise reduction, and shall be specified, as warranted, based on the conclusions of the noise assessment. 1) Incorporate facility design components to shield noise propagation, such as solid walls at the rear of stadium or facility seating. 2) Ensure loudspeakers are oriented properly to face away from adjacent noise-sensitive receivers. 3) Incorporate volume limiters in the sound amplification system.	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		4) Employ noise barriers at the perimeter of the stadium or facility boundary.	
Impact 4.13-2: The project would not result in generation of excessive groundborne vibration or groundborne noise levels.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.13-3: The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to noise and vibration.	Less than Significant	Mitigation not required.	Less than Significant
4.14 Population and Housing			
Impact 4.14-1: The project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.14-2: The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.14-3: The project would not result in a cumulatively considerable contribution to significant	Less than Significant	Mitigation not required.	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
cumulative impacts related to population and housing.			
4.15 Public Services			
Impact 4.15-1: The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.15-2: The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to public services.	Less than Significant	Mitigation not required.	Less than Significant
4.16 Recreation			
Impact 4.16-1: The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical	Less than Significant	Mitigation not required.	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
deterioration of the facility would occur or be accelerated. Additionally, the project would not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.			
Impact 4.16-2: The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to recreation.	Less than Significant	Mitigation not required.	Less than Significant
4.17 Transportation			
Impact 4.17-1: The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.17-2: The project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.17-3: The project would not substantially increase hazards due to a geometric design feature (e.g.,	Less than Significant	Mitigation not required.	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).			
Impact 4.17-4: The project would not result in inadequate emergency access.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.17-5: The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to transportation.	Less than Significant	Mitigation not required.	Less than Significant
4.18 Tribal Cultural Resources			
Impact 4.18-1: The project could cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or as	Potentially Significant	MM-TCR-1: Native American Monitoring. Cal Poly Pomona shall invite a Native American monitor from the proposed Master Plan's interested consulting tribe(s) (Tribes) to be present during all initial ground-disturbing activities for the project. Ground-disturbing activities shall include, but are not limited to, demolition, pavement removal, potholing, augering, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. The Native American monitor shall have the approval of the Tribes to monitor for tribal cultural resources. Prior to the initiation of ground-disturbing activities, the Native American monitor shall be invited to participate in a cultural resources sensitivity training as part of a worker environmental awareness program. Topics addressed by the Native American monitor shall include, but may not be limited to, the definitions and characteristics of tribal cultural resources and protocols to be taken in the event of an inadvertent discovery. On-site Native American monitoring shall conclude when project grading and excavation activities are completed, or when the Tribes and Native American monitor have indicated that the site has a low potential for tribal cultural resources. Daily monitoring logs shall be completed by the on-site Native American monitor. Monitoring logs shall provide descriptions of the relevant ground-disturbing activities; the type of construction activities performed; locations of ground-	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1.		disturbing activities; soil types; culturally related materials; and any other facts, conditions, and discovered tribal cultural resources including but not limited to Native American cultural and historical artifacts, remains, places of significance, etc. as well as any discovered Native American (ancestral) human remains and associated grave goods. Copies of monitor logs shall be provided to Cal Poly Pomona within 30 days of the conclusion of monitoring. MM-TCR-2: Inadvertent Discovery Protocols for Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial). In the event that unanticipated tribal cultural resources are exposed during ground-disturbing activities, all construction work occurring within 100 feet of the find shall immediately stop until the discovery has been fully assessed by a Native American monitor from the proposed Master Plan's interested consulting tribe(s) (Tribes). The work exclusion buffer may be adjusted as appropriate to allow work to feasibly continue at the recommendation of the Native American monitor. Should it be required, temporary flagging shall be installed around the tribal cultural resource in order to avoid any disturbances from construction equipment. The potential for avoidance should be the primary consideration of this initial process. The significance of the find shall be assessed as outlined by the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; California Public Resources Code section 21082). If the Tribes and Native American monitor observe the discovery to be potentially significant under CEQA, additional efforts, such as the preparation of an archaeological treatment plan, testing, and/or data recovery, are warranted prior to allowing construction to proceed in this area. MM-TCR-3: Inadvertent Discovery Protocols for Human Remains and Associated Grave Goods. In accordance with section 7050.5 of the California Health and Safety Code and the requirements of the California Code of Regulations (CCR) section 15064.5(e), if human remains are found, the Los Angeles County Coroner (County Coroner) shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed	

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		to be, Native American, The County Coroner shall notify the NAHC within 24 hours. In accordance with California Public Resources Code section 5097.98, the NAHC must immediately notify the person or persons it believes to be the Most Likely Descendent (MLD) of the deceased Native American. The MLD shall complete inspection after being granted access to the site and make recommendations for the treatment and disposition, in consultation with Cal Poly Pomona, of the human remains and associated grave goods.	
Impact 4.18-2: The project could result in a cumulatively considerable contribution to significant cumulative impacts related to tribal cultural resources.	Less than Significant	Implement MM-TCR-1, MM-TCR-2, and MM-TCR-3. (See Impact 4.18-1 for details of these mitigation measures.)	Less than Significant
4.19 Utilities and Service Systems			
Impact 4.19-1: The project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.19-2: The project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.	Less than Significant	Mitigation not required.	Less than Significant

Table 1-1. Summary of Project Impacts

Environmental Topic	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
Impact 4.19-3: The project would not result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.19-4: The project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.19-5: The project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste	Less than Significant	Mitigation not required.	Less than Significant
Impact 4.19-6: The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to utilities and service systems.	Less than Significant	Mitigation not required.	Less than Significant

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2 Introduction

The California Environmental Quality Act (CEQA) serves as the main framework of environmental law and policy in California. CEQA emphasizes the need for public disclosure and preventing or significantly reducing environmental damage associated with proposed projects. Unless the project is deemed statutorily or categorically exempt, CEQA is applicable to any project that is subject to discretionary approval by a public agency in order to be processed and established. The project consists of implementation of the proposed California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"), including "near-term" projects proposed for implementation within the first 5 to 10 years following proposed Master Plan approval and full Master Plan buildout through approximately year 2040. The proposed Master Plan does not qualify for any of the statutory or categorical exemptions listed in the CEQA Statute and Guidelines (Cal. Pub. Resources Code, Section 21000 et seq.; Cal. Code Regs. tit. 14, Section 15000 et seq.), and, therefore, must undergo CEQA review.

2.1 Purpose of the Environmental Impact Report

Under CEQA, the lead agency for a project is the public agency with primary responsibility for carrying out or approving the project, and for implementing the requirements of CEQA. As the CEQA lead agency for the project, the Board of Trustees of the California State University (CSU Board of Trustees)[1] prepared this Environmental Impact Report (EIR) under CEQA (Cal. Pub. Resources Code, Section 21000 et seq.) and the CEQA Guidelines (Cal. Code Regs. tit. 14, Section 15000 et seq.). An EIR is an informational document that is required to (1) identify the potentially significant environmental effects of a project on the environment, (2) indicate the manner in which those significant effects can be avoided or significantly lessened via the implementation of potentially feasible mitigation measures, (3) identify a reasonable range of potentially feasible alternatives to a project that would eliminate or substantially lessen any significant environmental effects, and (4) identify any significant and unavoidable adverse impacts that cannot be mitigated or otherwise reduced. According to the CEQA Guidelines, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. This EIR provides information about the potential effects of the project on the local and regional environment for the lead agency, responsible and trustee agencies, and the public.

The CSU Board of Trustees is required to consider the information in the EIR, along with any other relevant information, in making its decisions about the proposed Master Plan. Although an EIR does not determine the ultimate decision that will be made regarding implementation of a project, CEQA requires lead agencies to consider the information in the EIR and make findings regarding each significant effect identified in the EIR. The CSU Board of Trustees has the sole authority to consider and certify the Final EIR, approve the proposed Master Plan, and adopt a Mitigation Monitoring and Reporting Program, Findings of Fact, and Statement of Overriding Considerations, if warranted. Other agencies may also use this EIR in their review and approval processes, as indicated in Chapter 3, Project Description.

[1] The Board of Trustees of the California State University (CSU Board of Trustees) is the State of California acting in its educational capacity and is responsible for the oversight of the California State University system, including the Cal Poly Pomona campus, one of 22 campuses. It adopts rules, regulations, and policies governing Cal Poly Pomona. It has authority over curricular development, use of property, development of facilities, and fiscal and human resources management. As such, the CSU Board of Trustees is the lead agency under CEQA and is responsible for certification of the EIR for the proposed Master Plan and project approval.

2.2 Scope of the EIR

Projected growth and development anticipated by the proposed Master Plan for the Cal Poly Pomona main campus through approximately year 2040 are evaluated in this EIR at a program level. Campus lands beyond the main campus (i.e., Lanterman Development Center and Spadra Farm) and portions of the main campus (i.e., Innovation Village, University Village, and Spadra Landfill) are not the subject of the proposed Master Plan and this EIR. The proposed Master Plan for the main campus also includes "near-term projects" that are expected to be developed within the first 5 to 10 years following proposed Master Plan approval. This EIR provides descriptions of these components and evaluates them at a project level. Therefore, this EIR is both a program and project EIR. The full scope of the proposed Master Plan is described in detail in Chapter 3, Project Description.

The distinctions between a "program" and a "project" EIR and the associated level of analysis is described, below:

- **Program EIR:** Under state and California State University CEQA Guidelines, this EIR is being prepared, in part, as a "program" EIR. A program EIR may be prepared for a series of actions that are related geographically, or as part of a series of actions for adopting rules, regulations, plans, or general criteria for a continuing program or for individual activities carried out under the same authorizing law or regulation (Cal. Code Regs. tit. 14, Section 15168). Individual projects pursued in the future under the proposed Master Plan will be examined in light of the program analysis contained in this EIR to determine whether additional environmental documentation must be prepared.
  - If an individual project is within the scope of the program EIR and would not have new or more severe significant effects, no new environmental document would be required (Cal. Code Regs. tit. 14, Section 15168[c][2]). In this instance, the CSU prepares a finding of consistency with the Master Plan EIR (CSU 2019).
  - If some changes or additions are necessary, but no new or more severe significant effects would result, an addendum to the program EIR would be prepared (Cal. Code Regs. tit. 14, Section 15164[a]).
  - If an individual project would have significant effects that were not examined in the program analysis of this EIR, a new initial study would need to be prepared leading to either an EIR or negative declaration, which may be tiered from the program analysis in this EIR (Cal. Code Regs. tit. 14, Section 15168[c][1]). "Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a General Plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project (Cal. Code Regs. tit. 14, Section 15152). An EIR, rather than a negative declaration, will be required when the individual project may cause significant effects on the environment that were not adequately addressed in the programmatic analysis of this EIR. Significant environmental effects will be considered to have been "adequately addressed" if (1) they have been mitigated or avoided as a result of mitigation measures or requirements that are set forth in the programmatic analysis of this EIR and are adopted by the Board of Trustees or a responsible agency, or (2) the effects have been examined at a sufficient level of detail in the programmatic analysis of this EIR to enable them to be mitigated or avoided by site-specific revisions, the imposition of conditions, or by other means in connection with the approval of the individual project (Cal. Code Regs. tit. 14, Section 15152[f]).
- **Project EIR:** Under state and California State University CEQA Guidelines, this EIR is being prepared, in part, as a "project" EIR. A project EIR examines the environmental impacts of a specific development project. This portion of the EIR will focus primarily on the changes in the environment that would result from each

of the near-term projects. The EIR will examine all phases of these near-term projects at a site-specific level, including planning, construction, and operation (Cal. Code Regs. tit. 14, Section 15161) and is intended to provide comprehensive environmental clearance for these projects.

2.3 Environmental Review and Approval Process

2.3.1 Scoping

The CEQA Guidelines authorize and encourage an early consultation or scoping process to help identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed and considered in an EIR, and to help resolve the concerns of affected regulatory agencies, organizations, and the public (Cal. Code Regs. tit. 14, Section 15083). Scoping is designed to explore issues for environmental evaluation, ensuring that important considerations are not overlooked and uncovering concerns that might otherwise go unrecognized.

On April 8, 2024, a Notice of Preparation (NOP) was published for the proposed Master Plan to determine the scope and extent of environmental issues to be addressed in this EIR. The NOP was circulated for a 30-day comment period from April 8, 2024, to May 8, 2024. An EIR scoping meeting was held on April 24, 2024, to solicit input from interested agencies, individuals, and organizations.

The NOP and comments received in response are provided in Appendix A. A summary of pertinent comments received on the NOP is included at the beginning of each resource section in Chapter 4. To the extent that issues identified in public comments involve potentially significant effects on the environment according to the CEQA, and/or were raised by responsible and trustee agencies, they are identified and addressed in this EIR.

2.3.2 Public Review of Draft EIR

The Draft EIR will be distributed for a 45-day public review period from May 7 to June 20, 2025. During this public review period, written comments on the adequacy of the Draft EIR can be submitted by all interested public agencies, organizations, community groups, and individuals to the following contact by mail or email no later than 5 pm on June 20, 2025:

Ms. Carmen Chan, AICP
Planning Manager, University Capital Planning & Transportation
Facilities Planning & Management, Building 81-111
3801 West Temple Avenue
Pomona, California 91768
carmenchan@cpp.edu

The Draft EIR will be available for public review during the comment period at the following locations:

- Online at https://www.cpp.edu/masterplan
- Cal Poly Pomona University Library (Building 15), on the Cal Poly Pomona campus

Cal Poly Pomona encourages public agencies, organizations, community groups, and all other interested persons to provide written comments on the Draft EIR prior to the end of the 45-day public review period. If any agency, organization, group, or person wishes to make a legal challenge to the CSU Board of Trustees' final decision on the proposed Master Plan, that agency or person may be limited to addressing only those environmental issues that they or someone else raised during the 45-day public review period for the Draft EIR.

2.3.3 Final EIR and Consideration of Project Approval

Following the close of the public and agency comment period on the Draft EIR, responses will be prepared for all comments received during the public review period that raise CEQA-related environmental issues regarding the proposed Master Plan. The responses will be published in the Final EIR.

As required by CEQA, written responses to comments submitted by public agencies will be provided to those agencies for review at least 10 days prior to the CSU Board of Trustees' consideration of certification of the EIR. The EIR will be considered by the CSU Board of Trustees in a public meeting anticipated for July 22-23, 2025, and will be certified if it is determined to be in compliance with CEQA. Upon certification of the EIR, the CSU Board of Trustees will consider the proposed Master Plan for approval during the same public meeting.

2.3.4 Adoption of Mitigation Monitoring and Reporting Program

CEQA requires that a program to monitor and report on mitigation measures be adopted by lead agencies as part of the project approval process. CEQA requires that such a program be adopted at the time the lead agency determines to carry out a project for which an EIR has been prepared to ensure that mitigation measures identified in the EIR are implemented. The Mitigation Monitoring and Reporting Program will be prepared during the preparation of the Final EIR so that it can reflect any changes or revisions to mitigation measures made in response to public comments on the Draft EIR.

2.4 Contents of the EIR

The content and format of this EIR are designed to meet the requirements of CEQA and the CEQA Guidelines (Cal. Code Regs. tit. 14, Section 15122 through 15132). This EIR is organized into the following chapters so that the reader can easily obtain information about the proposed Master Plan and the specific environmental issues.

- **Chapter 1, Executive Summary,** presents background information related to the proposed Master Plan, provides an overview and alternatives to the proposed Master Plan being considered, identifies issues to be resolved and areas of known controversy, and summarizes the environmental impacts and mitigation measures.
- **Chapter 2, Introduction,** explains the CEQA process, describes the purpose and scope and the EIR, provides information on the review and approval process, and outlines the organization of this EIR.
- **Chapter 3, Project Description,** provides an overview of the proposed Master Plan; provides information about the location, setting, and background for the proposed Master Plan; identifies the project objectives; provides a detailed description of the characteristics of the proposed Master Plan; and lists the likely approvals necessary for the implementation of the proposed Master Plan.
- **Chapter 4, Environmental Analysis**, explains the approach to the environmental analysis for this EIR, and provides environmental setting, project and cumulative impacts, and mitigation measures for the topics under study in this EIR.
- **Chapter 5, Other CEQA Considerations,** identifies the growth-inducing impacts, the significant and unavoidable impacts, and the significant and irreversible commitment of resources associated with the project.
- **Chapter 6, Alternatives,** describes the alternatives to the proposed Master Plan that were considered but eliminated from further consideration, analyzes the environmental impacts of alternatives to the proposed Master Plan and compares them to the proposed Master Plan, and identifies the environmentally superior alternative.

- **Chapter 7, List of Preparers,** lists the organizations and individuals who were involved in preparing this EIR.
- **The Appendices** to the EIR contain additional information used in preparing this EIR. Appendix A contains the NOP and the comment letters that were submitted in response to the NOP. Appendix B contains the technical calculations for the air quality and greenhouse gas emissions calculations. Appendix C contains Biological Resources data. Appendix D contains the Cultural Resources Report and the Built Environment Report. Appendix E contains noise measurements and calculations. Appendix F contains the transportation calculations. Appendix G contains the Water Supply Evaluation.

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3 Project Description

3.1 Project Overview

The California State Polytechnic University, Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan") consists of a proposed Master Plan that would provide physical facility, space, and infrastructure improvements to support a planned enrollment of approximately 30,000 full-time equivalent students (FTES[1]) on the Cal Poly Pomona main campus. The proposed Master Plan, with an approximate planning horizon of year 2040, subject to available funding, includes renovation of existing buildings (renovation), demolition and/or replacement of existing buildings in the same general physical location (replacement), minimal construction of new buildings on undeveloped sites at the core of the campus (new construction), and retention of most buildings in their existing locations and configurations (buildings to remain). The proposed Master Plan would provide renovated, replacement, and new space for academic programs, student support services, student housing, and athletic and recreational facilities, for a total net increase of approximately 600,000 gross square feet (GSF) of building space and approximately 1,040 net new beds. At buildout, there would be a total of approximately 6.6 million GSF of building space on the Cal Poly Pomona main campus.

The proposed Master Plan identifies priority projects to be implemented in the near term, as well as longer-term projects for which less detailed information is currently available. Near-term projects are specific development components identified in the Master Plan and are expected to be constructed in the first 5 to 10 years following proposed Master Plan approval. The proposed Master Plan also identifies mobility and circulation, utilities and infrastructure, and sustainability and resiliency improvements and related strategies.

3.2 Project Location and Setting

3.2.1 Location and Setting

The existing Cal Poly Pomona main campus is located partially in the incorporated Cities of Pomona and Walnut and in the unincorporated area of Los Angeles County, California (Figure 3-1, Project Location). Los Angeles County is located in Southern California, north of Orange County and west of San Bernardino County. The cities of Pomona and Walnut are located in the eastern portion of Los Angeles County.

The approximately 860-acre main campus, which is the subject of the proposed Master Plan, is generally bounded by the Interstate 10 Freeway (I-10) to the north, Valley Boulevard to the east, and West Temple Avenue to the south. The Mt. San Antonio Community College campus abuts the Cal Poly Pomona campus on the west.

The main campus includes Innovation Village, which occupies the southeastern portion east of South Campus Drive and north of West Temple Avenue, and University Village student housing, south of West Temple Avenue at Valley Boulevard. The main campus also includes portions of the Spadra Landfill (described in detail below). No changes to Innovation Village or University Village are proposed under this proposed Master Plan, and they are

[1] FTES is the unit of measurement used to convert class load to student enrollment. At Cal Poly Pomona, one undergraduate FTES is equal to 15 units. Thus, one undergraduate FTES is equal to one undergraduate student enrolled in 15 units or 3 undergraduate students each enrolled in 5 units. A related unit of measurement is "headcount." In the case of one student taking 15 units, the headcount is 1; in the case of three students collectively taking 15 units, the headcount is 3.

not further discussed in this document. The Cal Poly Pomona main campus hillside extends northwest, abutting Forest Lawn Cemetery.

Beyond the main campus, Cal Poly Pomona owns property south of West Temple Avenue: the approximately 300-acre Lanterman Development Center (formerly the State of California Lanterman Center for the Developmentally Disabled); the 125-acre Spadra Farm, a one-time agricultural portion of the Lanterman Development Center and current site of the Cal Poly Pomona's teaching farm; and additional agricultural land, which formerly operated as the Spadra Landfill. The Spadra Landfill is a closed sanitary landfill property owned by Cal Poly Pomona and maintained by the Los Angeles County Sanitation Districts pursuant to an agreement between the parties. No new development is proposed for the Lanterman Development Center, Spadra Farm, or Spadra Landfill under this proposed Master Plan, and they are not further discussed in this document.

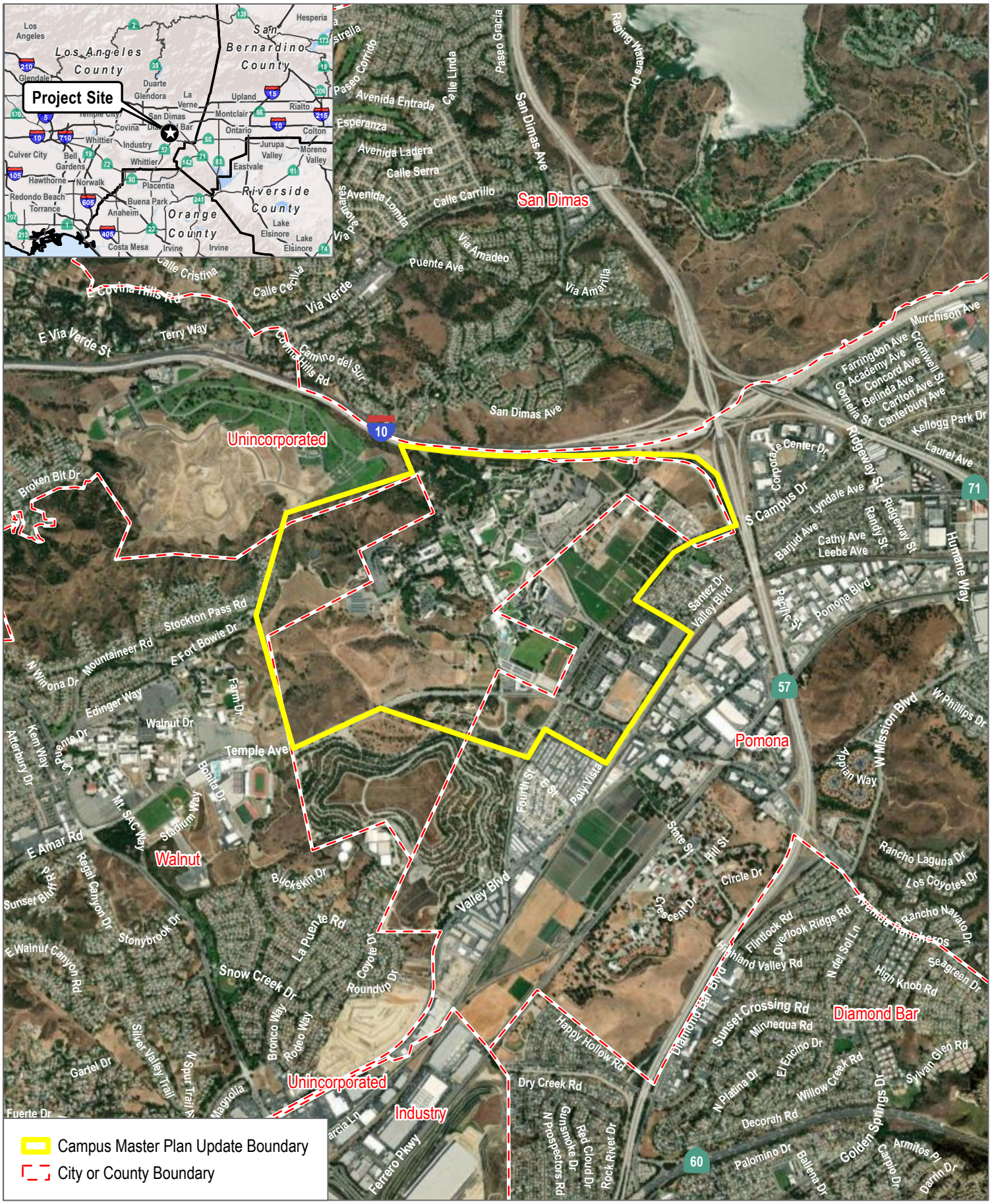
Regional access to the main campus is provided by I-10, State Route 57, and State Route 60. Public transit service to the campus and vicinity is provided by Foothill Transit buses and Metrolink commuter rail. Foothill Transit has multiple stops along West Temple Avenue, South Campus Drive, and Kellogg Drive. Foothill Transit buses to Cal Poly Pomona include route numbers 190, 194, 195, 289, 480, 482, 486, and the Silver Streak route. The campus is near both the Metrolink San Bernardino Line and the Riverside Line, as well as the future extension of the Foothill Gold Line Construction Authority A-Line. Nearby Metrolink stations include the Pomona Downtown Station, Pomona North Station, and City of Industry Station. Campus-run shuttle services between the Pomona North Station and main campus are currently available at peak times.

3.2.2 Existing Campus

The campus had a rich history prior to becoming a public university. In the fall of 1938, Cal Poly Pomona opened as the Voorhis Unit of the California Polytechnic School (Cal Poly San Luis Obispo) on the 150-acre site of the former Voorhis School for Boys in San Dimas, located just 3 miles north of the current campus. In 1949, breakfast cereal magnate W.K. Kellogg deeded his 813-acre winter ranch to the State of California to use as a public university on the condition that it "continuously breed and develop purebred Arabian horses upon the property" (State of California 1949). Today, the W.K. Kellogg Arabian Horse Center is a showcase facility that houses purebred Arabian horses. In 1966, Cal Poly Pomona separated from the San Luis Obispo school to become California's sixteenth state college. University status was granted in 1972.

Today, Cal Poly Pomona is one of the largest of the California State University (the CSU) campuses in terms of acreage, and it extends beyond the boundaries of the original ranch. The majority of university programs are housed on the main campus, which comprises approximately 160 buildings totaling approximately 5.9 million GSF of building space and housing eight academic colleges: Agriculture; Business Administration; Collins College of Hospitality Management; Education and Integrative Studies; Engineering; Environmental Design; Letters, Arts and Social Sciences; and Science. In addition, community access to traditional extended programs is offered through the College of Professional and Global Education.

Most of the existing main campus development is centrally located and concentrated, as portions of the main campus are not suitable for development due to topographic and seismic fault constraints. The topography of the main campus ranges from lowlands in the southeast to rolling hills that rise almost 175 feet to the ridgeline along the northwestern edge of the campus. The main campus is characterized by steep slopes with orchards, horse pastures, and other undeveloped open space; moderate slopes, which are cultivated by the College of Agriculture; and areas of relatively level terrain developed with campus academic, residential, and student support services. The existing campus Master Plan map is shown in Figure 3-2, Existing Campus Master Plan.



SOURCE: ESRI 2024; Los Angeles County

DUDEK

0 1,000 2,000 Feet

FIGURE 3-1

Project Location

Cal Poly Pomona Campus Master Plan EIR

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California State Polytechnic University, **Pomona**

Master Plan Enrollment: 20,000 FTE

Master Plan approved by the Board of Trustees: September 1964

Master Plan Revision approved by the Board of Trustees: March 1965, October 1967, September 1970, March 1971, May 1972, January 1975, November 1977, September 1978, September 1979, September 1980, February 1981, May 1982, September 1984, May 1985, November 1985, September 1986, September 1987, May 1989, May 1991, July 2000, November 013, January 2015, November 2016

1. Administration
2. Agriculture Classrooms
3. Science
4. Biotechnology
4A. Biotrek Learning Center
5. Letters, Arts and Social Science
6. Business Administration
7. Environmental Design
8. Science
9. Engineering
13. Art/Engineering Annex
13B-D. Learning Resource Center
15. Library
16. Library Mechanical Equipment
17. Engineering Labs
20. Encinitas Hall (not in use)
21. Montecito Hall (not in use)
22. Alamitos Hall (not in use)
23. Aliso Hall (not in use)
24. Music
24A-F. Modular Surge Space
25. Drama/Theater
26. University Plaza
26A. Student Orientation Center
27. Water Filtration Plant
28. Fruit and Crop/Greenhouse
28A. Plant Sciences Lab
29. Arabian Horse Center
29A. Horse Arena
29B. Weaning Barn
29C. Paddocks
29D. Horse Barn
30. Agriculture Unit
31. Poultry Unit
32. Beef Unit
33. Feed Mill Unit
35. Bronco Student Center
35A. Kellogg Art Gallery
37. Swine Unit
38. Sheep Unit
41. Darlene May Gymnasium
42. Bronco Recreation and Intramural Complex
42A. Restroom Building
42B. Pool Support Building
42C. Pool Building
43. Kellogg Gymnasium
45. Agriculture Engineering
46. Health Service
48. Custodial Services
49. Beaver House
52. Commons Building
54. Vista de Las Estrellas
55. Kellogg Foundation Services
57. Palmitas Hall (not in use)
58. Cedritos Hall (not in use)
59. La Cienega Center
60. Vista Bonita
61. Vista Del Sol
62. Vista de Las Montanas
63. Vista de La Luna, Phase II
64. Old Rose Float Lab
66. Bronco Bookstore
67. Equine Research Facility
68. Hay Barn
70. Los Olivos (not in use)
71. Housing Maintenance Building
72. Center Pointe Dining
73. Sicomoro Hall
74. Secoya Hall
75. Purchasing and Receiving
76. Kellogg West
76A. Kellogg West Addition
77. Kellogg West Main Lodge
78. Kellogg West Lodge Addition
79. The Collins College of Hospitality and Management
80. Marriott Learning Center and Lundberg Hall
81. Physical Plant Office
81A Environmental Health & Safety
85. I-Poly High School
86. English Language Institute
86A-C. Temporary Classrooms/ Faculty Offices II
88. *Facilities Management and Corporation Yard*
89. Interim Design Center
89A. Interim Design Center Addition
89B. Interim Design Center Faculty Offices
91. Temporary Administration Offices
92. Laboratory Care Facility
93. *Environmental Design Center*
94. University Office Building
95. Multi-Culture Center
96. Paint Shop
97. Campus Center
98. CLA Building
105. Rose Float Facility
106. Parking Structure I
107. Parking Structure II
108. *Parking Structure III*
109. Public Safety and Parking Services
111. Manor House
112. University House
113. Kellogg Guest House
116. Child Care Center
118. Hazardous Waste Material Storage
121. Student Services Building
122. *Information Booth*
123. Bronco Performance Center
124. Restrooms
125. Restrooms
127. *Academic Building*
133. *Visitor Information*
134. Visitor Information
143. Upper Reservoir
144. Lower Reservoir
150. MASA Building
152. *Physical Education Expansion*
155. *Center for Animal Veterinary Science Education*
162. College of Business Administration (B)
163. College of Business Administration (C)
164. College of Business Administration (A)
191. Electrical Substation
192. Electrical Switchgear
193. Central Plant-Chiller
200. University Village
207. Amonic Solar PV
208. *Center for Regenerative Studies, Phase II*
209A-D. John T. Lyle Center for Regenerative Studies
210. Landlab Information Center
211. Agriscapes
212. *Resources Evaluation and Research Center*
213. Agriscapes Greenhouse
214. Food Production Container
215. Innovation Village, Phase V
216. Innovation Village, Phase IV
218. American Red Cross Headquarters
219. Innovation Village, Phase III Office/Research Facility
220A-C. Center for Technology, Training and Incubation
350 Modular Data Center

LEGEND:
Existing Facility / *Proposed Facility*

NOTE: Existing building numbers correspond with building numbers in the Space and Facilities Data Base (SFDB)

SOURCE: California State Polytechnic University, Pomona 2024

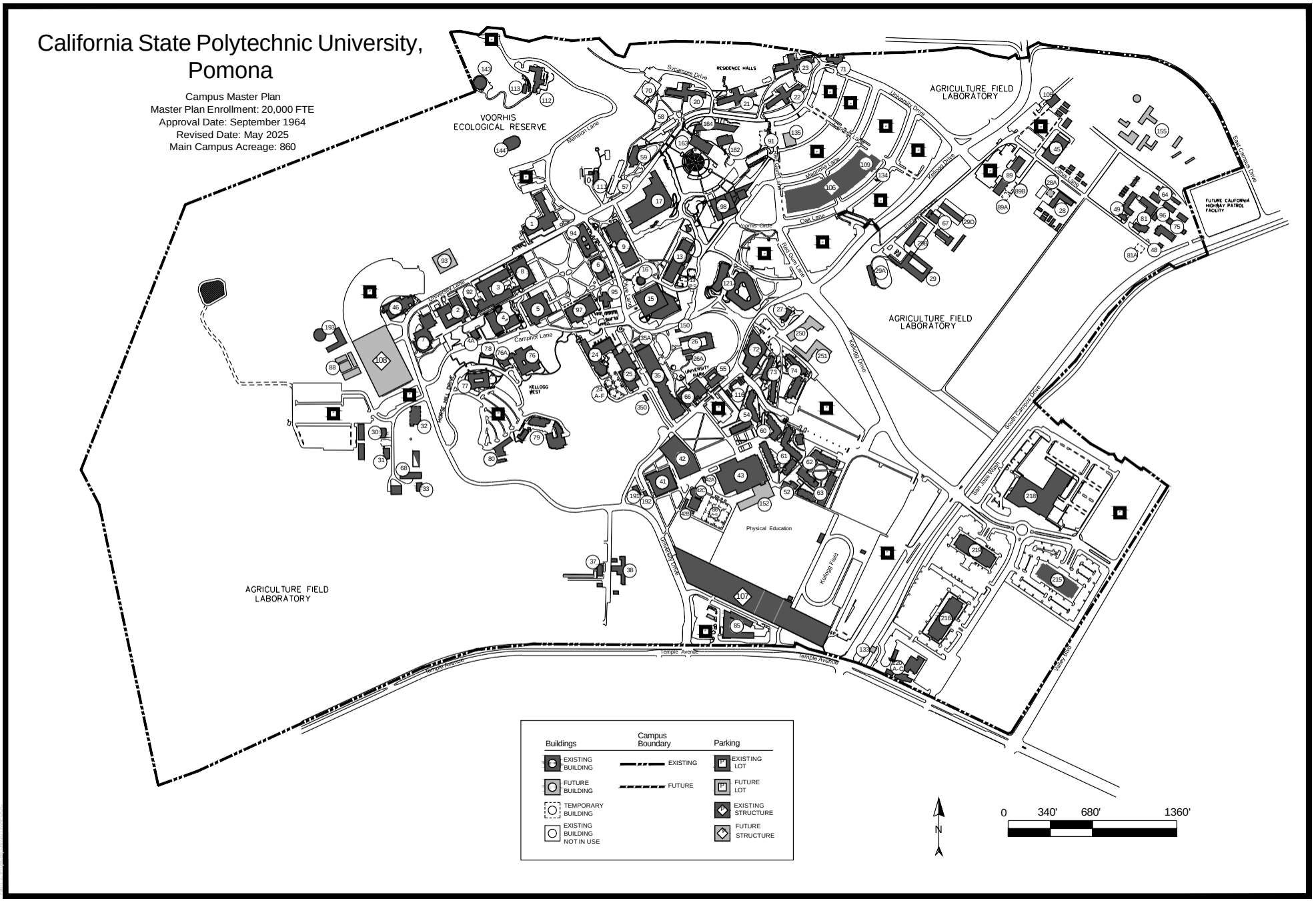
FIGURE 3-2a

Existing Campus Master Plan

Cal Poly Pomona Campus Master Plan EIR

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SOURCE: California State Polytechnic University, Pomona 2024

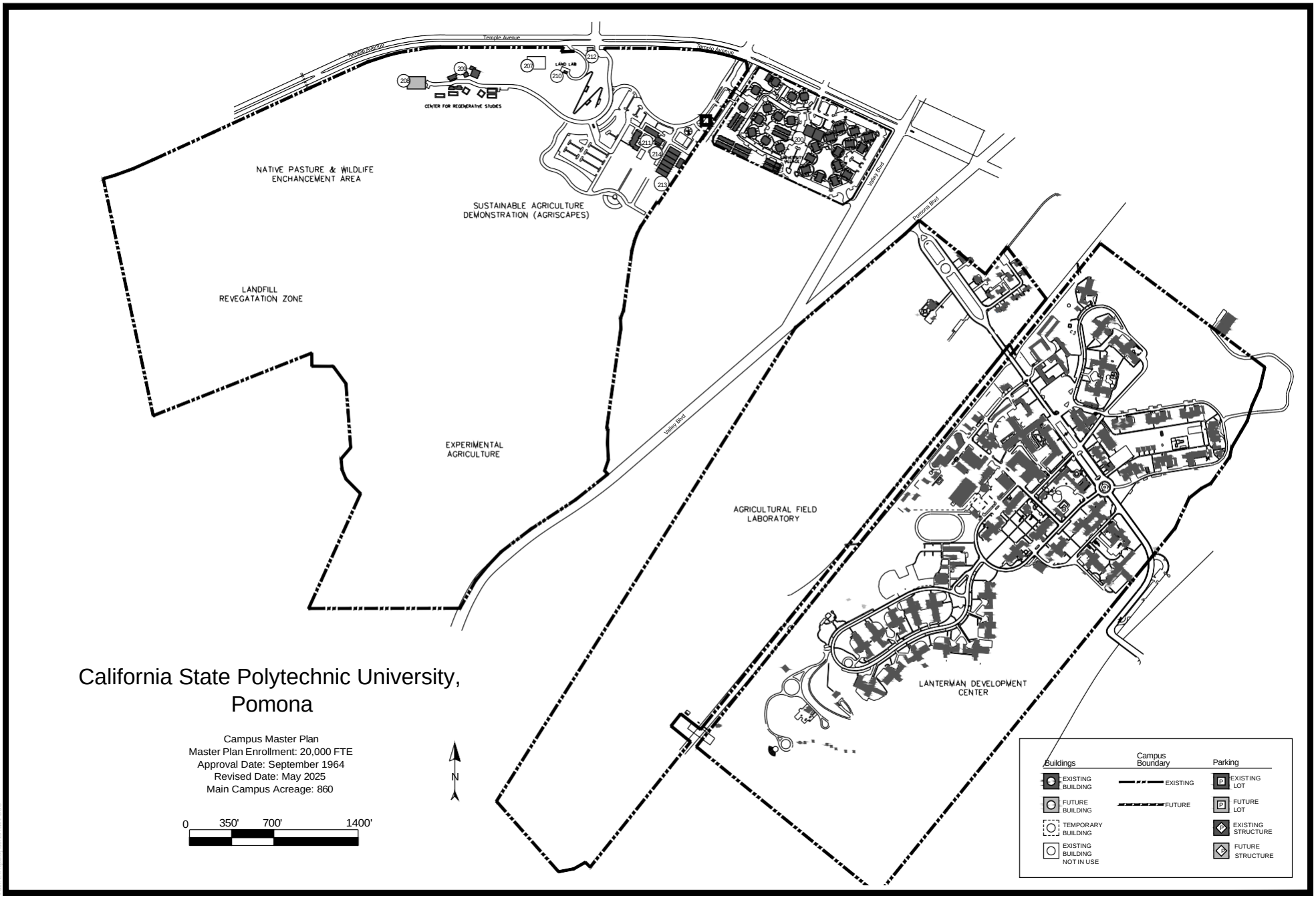
FIGURE 3-2b

Existing Campus Master Plan

Cal Poly Pomona Campus Master Plan EIR

DUDEK

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SOURCE: California State Polytechnic University, Pomona 2024

FIGURE 3-2c

Existing Campus Master Plan

Cal Poly Pomona Campus Master Plan EIR

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3.2.2.1 Existing Campus Land Uses

The main campus is organized into different land uses, including concentrations of academic and student support services; student housing; athletics and recreation; agricultural facilities; open space; Innovation Village; International Polytechnic High School (I-Poly), operated by the Los Angeles County Office of Education; and off-street surface and structured parking facilities. The following discussion describes each use.

Academic and Student Support Services

Academic and student support services are generally concentrated in the center of campus. The original campus core includes the Old Administration Building (Building 1); College of Agriculture (Building 2); Science Laboratory (Building 3); College of Letters, Arts, and Social Sciences (Building 5); College of Education and Integrative Studies (Building 6); College of Environmental Design (Building 7); College of Science (Building 8); College of Engineering (Building 9); Art Department and Engineering Annex (Building 13); Library (Building 15); Library Mechanical Equipment (Building 16); Engineering Laboratories (Building 17); Music Building (Building 24); Drama and Theatre (Building 25); Collins College of Hospitality Management (Buildings 79, 79A, 79B, and 80); University Office Building (Building 94); Cultural Centers (Building 95); and the Campus Marketplace (Building 97). These buildings generally surround the University Quad and are adjacent to the intersection of University Drive and Olive Lane (see Figure 3-3, Illustrative Campus Master Plan, for the location of the campus core). Later additions included the College of Business Administration (Buildings 162, 163, and 164); the Biotechnology Building (Building 4); and the BioTrek Learning Center (Building 4A). Each campus-core building (e.g., College of Science, College of Agriculture) was intended to have its own "neighborhood," with informal courtyard space and a face along the University Quad.

The original campus core has grown over the decades and now extends to the athletic and recreational facilities to the southeast and the orchards and Arabian pastures to the northeast. With its polytechnical emphasis, the campus has unique facilities for animals, horticulture, and agriculture programs, as well as the College of Professional and Global Education and the Center for Training, Technology & Incubation, both located in Innovation Village. Clusters of academic buildings, such as the Interim Design Center (Building 89) and Apparel Merchandising and Management (Building 45), are outside of the campus core in the northeastern portion of the campus near South Citrus Lane and Kellogg Drive.

Existing student support service uses are concentrated in a compact hub in the geographic center of the campus, where the Campus Marketplace (Building 97), Library (Building 15), and Student Services Building (Building 121) are located. The Centerpointe Dining Commons (Building 72) connects student support services with the new Residential Halls (Buildings 73 and 74) and Residential Suites (Buildings 54, 60, 61, 62, and 63).

I-Poly is located at 3851 West Temple Avenue, Pomona, California 91768, in the southwesterly portion of the main campus, adjacent to Parking Structure II. I-Poly is a specialized, public, college-prep high school in operation since 1993 (I-Poly 2025) through a ground lease arrangement between the Los Angeles County Office of Education and Cal Poly Pomona. Approximately 525 students attend I-Poly each year (Stephens, pers. comm., 2024).

Student Housing

Student housing facilities are operated by University Housing Services and Foundation Enterprises and are distributed throughout the main campus. The original collection of student housing buildings, known as the Traditional Halls, and associated support services and dining halls are found in the northern portion of the main campus, immediately south of I-10. These buildings include the "Reds" (Encinitas Hall [Building 20], Montecito Hall

[Building 21], Alamitos Hall [Building 22], and Aliso Hall [Building 23]); the Los Olivos Dining Hall (Building 70); the "Greys" (Palmitas Hall [Building 57] and Cedritos Hall [Building 58]); and the La Cienega Center (Building 59). The "Greys," Los Olivos Dining Hall, and the La Cienega Center are vacant due to seismic concerns and will be removed prior to implementation of the Master Plan, as a separate project under separate environmental review. Sicomoro Hall (Building 73) and Secoya Hall (Building 74) are two mid-rise residential hall buildings, located in the southern portion of the main campus, east of University Plaza. Centerpointe Dining Commons (Building 72) is located adjacent to Sicomoro and Secoya Halls. In addition, the existing Residential Suites (Estrellas [Building 54], Bonita [Building 60], Del Sol [Building 61], Montanas [Building 62], and Luna [Building 63]), are located in the southern portion of the main campus, north of the recreational fields. The University Village Apartments, which are operated by Foundation Enterprises, are located in the southeastern portion of the main campus and include apartment-style student housing.

Athletics and Recreation

Existing athletic and recreational spaces support active recreational opportunities, athletic programming, and classes. The athletic and recreational uses are generally located at the southern end of the campus adjacent to the existing Residential Suites. Athletic and recreational facilities include Darlene May Gymnasium, Bronco Recreation Intramural Complex (BRIC), Kellogg Arena, tennis courts, a soccer field, Kellogg Stadium, and Scolinos Baseball Field.

Open Space

Open space on the campus comprises traditional green quads, commons, parks, and gardens. These uses are located throughout the campus and provide passive recreational opportunities and outdoor study spaces. Campus quads, commons, and parks are large open spaces intended for gatherings and special events. These areas are characterized by lawns, pedestrian walkways, benches, and trees for shade. Examples of these uses include the Bronco Commons, University Park, Voorhis Park, the University Quad, and the Engineering Meadow. Gardens include formal or informal landscape elements such as ponds, bridges, sculptured rock, gazebos, and seating areas. Gardens on the campus include the rose garden, BioTrek Ethnobotany Garden, and Japanese garden.

Agricultural Facilities and Reserves

Existing agricultural facilities, which support the College of Agriculture, are located along the perimeter of the main campus. The W.K. Kellogg Arabian Horse Center and horse pastures are located within the Agricultural Field Laboratory in the northeastern portion of the main campus. The Voorhis Ecological Reserve is located in the northern portion of campus, south of Kellogg House, and contains coastal sage scrub and oak woodland (Cal Poly Pomona 2025a). Agricultural Field Laboratories are located in the northeastern and western portions of the main campus. The Agricultural Field Laboratories in the northeast include pastures, groves, and greenhouses, which are located on flat topography. The Agricultural Field Laboratories in the western portion of the main campus include pastures on rolling hills and several structures that support livestock.

Master Plan Boundary

Campus Core

DEMOLITION

13/13A - Art Department/Engineering Annex (1965)

24A-F - Music Department Modulars

41 - Darlene May Gymnasium (1957)

46 - Student Health Services (1975)

66 - Bronco Bookstore (c. 1988)

86 - English Language Institute (2009)

97 - Campus Center (1957)

116 - Child Care Center (c. 1980)

NEW CONSTRUCTION

10 - Campus Center and Interdisciplinary Academic Resources Building

14 - Engineering Graduate Building

35C - Bronco Student Center Conference Center Expansion

44 - Student Health & Wellness Center Replacement

217 - Children's Center Replacement

252, 253 - Student Housing Replacement Project (Phase II)

A - Softball Facility

RENOVATIONS

1 - Old Administration (1961)

2 - College of Agriculture (1963)

5 - College of Letters, Arts, and Social Sciences (1959)

6 - College of Education and Integrative Studies (1959)

7 - College of Environmental Design (1971)

8 - College of Science (1976)

9 - College of Engineering (1959)

13B-D - ROTC Relocation & Site Reuse

15 - University Library (1969)

17 - Engineering Labs (2001)

24 - Music (Arts Complex) (1963)

25 - Drama Department/Theatre (1963)

29 - W.K. Kellogg Arabian Horse Center (1974)

35 - Bronco Student Center (1976)

35A - W. Keith and Janet Kellogg University Art Gallery (1987)

41 - Darlene May Gymnasium (1957)

42 - Bronco Recreation & Intramural Complex Expansion

43 - Kellogg Gymnasium (1966)

76 - Kellogg West Education/Dining (1971)

76A - Kellogg West/Addition (1975)

77 - Kellogg West Main Lodge (1971)

78 - Kellogg West Addition (1978)

85 - I-Poly High School (2013)

94 - University Office Building (1984)

98 - Classroom/Laboratory/ Administration Building and Tower (1993)

B - Recreational Fields Support Facilities

C - Soccer and Track & Field Stadium Replacement

MOBILITY AND CIRCULATION IMPROVEMENTS

133 - Bronco Mobility Hub

D - Kellogg Drive and East Campus Drive Roadway Reconfigurations (including I-10 Gateway)

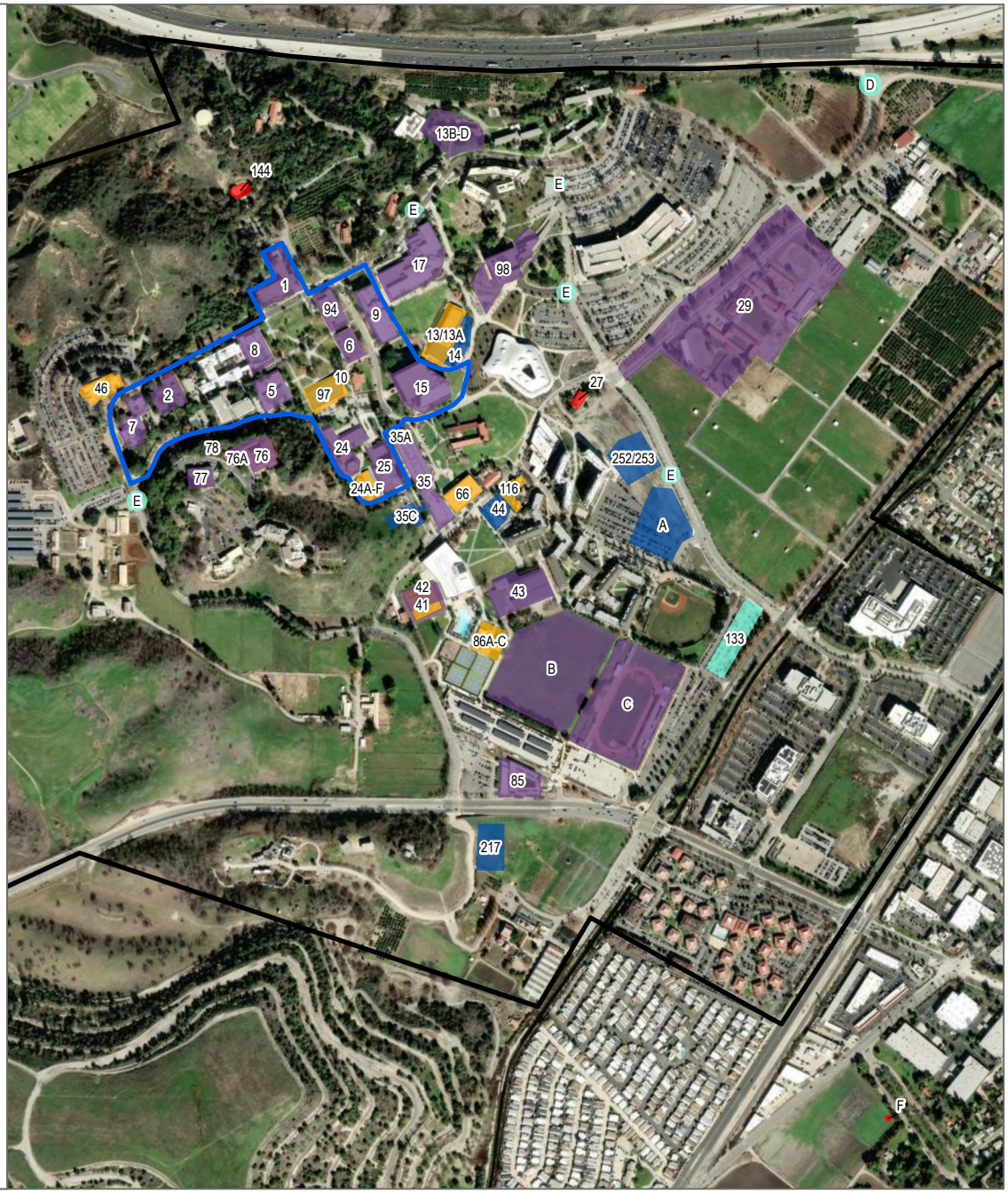
E - Campus Loop Construction

UTILITY IMPROVEMENTS

27 - Well Water and Water Treatment Plant Expansion

144 - Lower Reservoir Tank Replacement

F - Spadra Well Waterline Extension



SOURCE: California State Polytechnic University, Pomona 2024; World Imagery

Cal Poly Pomona is in the process of auditing and updating their building information (names/numbers). There may be future inconsistences due to these changes.

DUDEK

0 500 1,000 Feet

FIGURE 3-3

Illustrative Campus Master Plan

Cal Poly Pomona Master Plan EIR

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Innovation Village

Innovation Village is a corporate research and technology park located in the southeastern corner of the main campus. These office and research facilities are leased to organizations interested in partnering with Cal Poly Pomona to complement and enhance university programs. The Center for Training, Technology & Incubation, located in the southwestern corner of Innovation Village, offers emerging to medium-size companies the opportunity to lease office and wet lab space designed to expand with company growth (Innovation Village 2019). The American Red Cross Headquarters, Southern California Edison, and Innovation Brew Works are major tenants in the northern portion of Innovation Village. Innovation Village promotes and supports technology transfer, student/faculty professional development and employment, and economic development with these and other tenants.

Parking

The main campus has two parking structures: Parking Structure I (2,383 spaces), located in the north, and Parking Structure II (1,750 spaces), located south of the athletic and recreational facilities. Surface parking lots surround the parking structures to the northeast and south of the main campus and also in the western portion of campus adjacent to the Agricultural Field Laboratories. There are currently 14,258 permitted parking spaces on campus and approximately 1,088 additional spaces in two designated overflow lots at Innovation Village. A campus shuttle runs from these lots to the campus core throughout the day.

3.3 Background

Each of the 22 campuses within the CSU system is required by the CSU Board of Trustees to prepare and periodically update a physical Master Plan. The Master Plan is intended to guide the physical campus development necessary to support the needs of current students, faculty, and staff, as well as projected student enrollment and student, faculty, and staff campus population growth; these projected numbers serve as the basis for determining long-term academic and student support services, housing, and athletic and recreational program needs, in accordance with approved educational policies and objectives (The California State University 2023).

The last comprehensive revision to the Master Plan for the Cal Poly Pomona campus was approved in 2000 and was intended to guide campus development through 2010. Since then, a number of minor and major Master Plan revisions have been approved by the CSU Board of Trustees under delegated approval authority. The 2000 Master Plan provided a framework for land use, development, open space, and circulation to accommodate projected enrollment of 20,000 FTES on the campus by 2010. A number of 2000 Master Plan projects have been implemented as originally proposed.

3.4 Project Objectives

California Environmental Quality Act (CEQA) Guidelines Section 15124(b) requires the statement of a project's objectives to be clearly written so as to define the underlying purpose of a project in order to permit development of a reasonable range of alternatives and aid the lead agency in making findings when considering a project for approval. The underlying purpose of the proposed Master Plan is to guide the physical development of the campus in a manner that supports Cal Poly Pomona's 2017–2025 Strategic Plan, its 2018–2019 through 2022–2023 Academic Master Plan, and the enrollment of approximately 30,000 FTES and accompanying faculty and staff growth, while preserving and enhancing the campus environment and quality of life.

The following objectives are based on the goals and organizing principles of the proposed Master Plan and support its underlying purpose:

1. Support and advance Cal Poly Pomona's educational mission, as defined by the California Education Code, by guiding the physical development of the campus to accommodate enrollment growth to approximately 30,000 FTES and expanding the number of faculty and staff to support such enrollment growth, subject to funding.
2. Renovate or demolish buildings that are inefficient in terms of operation, maintenance, and user comfort due to age and critical deferred maintenance.
3. Replace demolished and temporary buildings with higher-density, mixed-use buildings that consolidate and integrate colleges and student support services.
4. Strengthen campus residential life by constructing new or replacement buildings to:
    - Increase student housing capacity by approximately 1,040 net new beds to enhance student experience, support, wellness, success, and retention.
    - Include a more diverse mix of housing types for students (freshman dormitories, pod configurations, suites, and apartments).
    - Provide high-quality and affordable student housing options.
    - Include common spaces, active outdoor spaces, and space for student support services within student housing.
5. Preserve space in the campus core for academic uses and programming and for student-focused services.
6. Provide I-Poly High School students additional space to accommodate recreational activities, subject to the Los Angeles County Office of Education securing grant funds.
7. Provide mobility enhancements for safe, sustainable, and accessible circulation within and around the campus for pedestrians and bicyclists, to reduce reliance on vehicles and provide students, faculty/staff, and visitors with safe and easy access to public transit as an alternative to bringing a car to campus.
8. Provide high-quality athletic facilities and optimize existing recreational fields by utilizing land area and improving connections to and through the sports facilities.
9. Update infrastructure to provide safe and reliable utilities to the campus community.
10. Reduce reliance on fossil fuel consumption by expanding campus renewable energy production and by constructing and renovating buildings to meet Leadership in Energy and Environmental Design (LEED) certification requirements.

3.5 Campus Population Projections

Master Plans are intended to identify, describe, and provide a framework for implementing proposed physical improvements to accommodate a projected change (generally an increase) in student enrollment and corresponding campus population (which includes students, faculty, and staff) through an identified planning horizon year. The enrollment projections serve as the basis for determining a campus's long-term space and infrastructure needs.

Master Plans are based on annual academic year enrollment projections prepared by each university as directed by the CSU Board of Trustees, which consults with the State of California to anticipate systemwide enrollment growth and associated funding in accordance with the CSU's educational mission according to California's Education Code.

The California budget is the primary factor that determines enrollment levels at CSU campuses. The CSU Board of Trustees require each campus to have a Master Plan, showing existing and anticipated facilities necessary to accommodate a specified enrollment at an estimated target date or planning horizon, in accordance with approved educational policies and objectives.

Each year, the CSU negotiates with the State of California for funding to support planned enrollment growth as part of the annual budget process. The annual state budget identifies anticipated enrollment growth systemwide for the CSU each year. The state's 2024–2025 Budget Act directed the CSU to increase resident undergraduate enrollment by 6,338 FTES systemwide in 2024–2025. The CSU reported that it is exceeding that expectation, growing by an estimated 9,326 resident undergraduate FTES. The 2025–2026 state budget plan sets expectations that the CSU will grow by an additional 10,161 FTES in 2025–2026 and by the same number in 2026–2027 (State of California Legislative Analyst's Office 2025).

Following negotiation, the CSU allocates enrollment growth funding for California residents according to an enrollment target for each of the 22 CSU campuses. Campuses are expected to manage their enrollments within a small margin of error around the target because they receive state/CSU funding only for the targeted number. In the past, when the state has experienced a fiscal crisis, the enrollment funding for the CSU was reduced, and campuses had to reduce their enrollment until additional funding became available in subsequent years. During the past 30 years, enrollment reductions have occurred four times.

Individual campuses establish their long-term enrollment goals through the campus master planning process. This process sets a future campus capacity that the campus can work toward accommodating. However, because of variations in state funding and CSU allocations, the annual growth rate can vary from year to year. Enrollment projections do not mandate or commit the CSU to any specific level of student enrollment or overall growth, nor do they set a cap or maximum population limit that a campus can physically support.

Student enrollment at Cal Poly Pomona is measured using FTES. As noted above, at Cal Poly Pomona, one undergraduate FTES is equal to 15 units. For the purposes of this Environmental Impact Report (EIR), FTES is generally the most appropriate measure of student population at the campus, as opposed to headcount, because it provides a more accurate representation of the student population that will be on campus at a given time. Headcount totals assume that every enrolled student is on campus full time, which can lead to an overstatement of the campus student population and, consequently, the associated environmental impacts. Potential impacts associated with the on-campus population (i.e., vehicle miles traveled, demand for water or public resources, solid waste generation) are analyzed proportionate to the amount of time any one student or faculty member may be on campus based on their unit loads, or for staff, based on their responsibilities.

However, there are instances where consideration of headcount information is appropriate. Student, faculty, and staff headcount is considered the preferred metric for purposes of analyzing population changes for a project of this nature (i.e., Campus Master Plan). The use of fall semester headcount is considered more appropriate than FTES when considering population-based analysis. This EIR, where appropriate, uses fall semester headcount data because enrollment is generally highest during the fall term, decreases slightly during the spring semester, and decreases substantially during the summer.

In addition to the student population, the Master Plan projects the number of associated faculty and staff, which includes FTE employees and auxiliary employees necessary to support students at Cal Poly Pomona. FTE employees include the following occupational groups: faculty, professional/technician, office/administrative support, service occupations, construction/maintenance/transportation, and management. The total number of FTE employees

excludes student employees, other intermittent or casual employees, and faculty teaching in extension courses, special sessions, and summer sessions.

Table 3-1 depicts the breakdown of student enrollment and the staff and faculty count under existing conditions and upon buildout of the proposed Master Plan. During the fall 2023 academic term, Cal Poly Pomona's total enrollment was 22,847 FTES and 2,231 FTE faculty and staff members. Implementation of the proposed Master Plan would provide for space and facility needs to support planned growth from 22,847 FTES to approximately 30,000 FTES. It is assumed that the current student to faculty and staff ratio (10.2 FTES to 1 FTE faculty and staff)[2] would be maintained, for an increase in 710 FTE faculty and staff members.

Table 3-1. Existing and Projected Student, Staff, and Faculty Campus Population

Demographic	Existing Campus Population (Fall 2023)	Master Plan Buildout Projected Campus Population	Net Increase
Student Population			
Students (FTES)	22,847	30,000	7,153
Students (Headcount)[a]	26,415	34,500	8,085
Staff and Faculty Population			
Staff and Faculty (FTE)	2,231	2,941	710
Staff and Faculty (Headcount)[b]	2,762	3,641	879

Source: Cal Poly Pomona 2024 and 2025b .
Notes: FTES = full-time equivalent students; FTE = full-time equivalent.
[a] The projected student headcount was based on existing ratios of FTES to headcount, calculated as follows: Student Headcount = 1.15x × FTES.
[b] The projected staff and faculty headcount was based on existing ratios of FTE to headcount, calculated as follows: Staff and Faculty Headcount = 1.238001x × FTE.

3.6 Master Plan Components

The proposed Master Plan addresses Cal Poly Pomona's current and future needs with a focus on optimizing the existing physical assets of the campus. The proposed Master Plan also identifies priority projects to be implemented in the near term (the first 5 to 10 years of Master Plan implementation). The primary strategies for implementing this Master Plan include renovation of existing buildings (renovation), demolition and replacement of existing buildings in the same general physical location (replacement), minimal construction of new buildings at the core of campus (new construction), and leaving most buildings in their existing location and configuration (buildings to remain).

Overall, the proposed Master Plan would include approximately 600,000 GSF of net new building space for academics, student support services, and athletic and recreation facilities. The proposed Master Plan would also include 1,040 net new beds added to the main campus. With existing and approved development and proposed new Master Plan development, there would be a total of approximately 6.6 million GSF of building space at Cal Poly Pomona.

[2] During the 2022–2023 academic school year, Cal Poly Pomona's total enrollment was 22,847 FTES and 2,231 FTE faculty and staff members. Therefore, the current student to faculty and staff ratio is 10.2 FTES to 1 FTE faculty and staff.

Additionally, outdoor athletics and recreational facility improvements are planned. To enhance campus connectivity and access to transit, mobility and circulation improvements are also proposed. Projects contemplated in the proposed Master Plan are dependent upon securing funding; therefore, it is possible that not all projects described as part of the proposed Master Plan would be realized. No new development is proposed for Spadra Farm, Spadra Landfill, Innovation Village, or the Lanterman Development Center under this proposed Master Plan, and these locations are not addressed further in this EIR. Table 3-2 provides the building development contemplated with full buildout of the proposed Master Plan and the anticipated size of the projects. Figure 3-3 is an illustrative plan showing existing and proposed building development. Figure 3-4 provides the approximate locations and footprints of the proposed Master Plan development that would be considered for approval by the CSU Board of Trustees.

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California State Polytechnic University, **Pomona**

Master Plan Enrollment: 30,000 FTE

Master Plan approved by the Board of Trustees: September 1964

Master Plan Revision approved by the Board of Trustees: March 1965, October 1967, September 1970, March 1971, May 1972, January 1975, November 1977, September 1978, September 1979, September 1980, February 1981, May 1982, September 1984, May 1985, November 1985, September 1986, September 1987, May 1989, May 1991, July 2000, November 2013, January 2015, November 2016

Last Comprehensive Master Plan Revision Approved by the Board of Trustees: July 2000
Last Minor Master Plan Revision: May 2025

1. Administration
2. Agriculture Classrooms
3. Science
4. Biotechnology
4A. Biotrek Learning Center
5. Letters, Arts and Social Sciences
6. Business Administration
7. Environmental Design
8. Science
9. Engineering
10. *Campus Center & Interdisciplinary Academic Resources Building (IARB)*
13. Art/Engineering Annex
13B. Temporary Trailer
13C. Temporary Trailer
13D. Temporary Trailer
14. *Engineering Graduate Building*
15. Library
16. Library Mechanical Equipment
17. Engineering Labs
20. Encinitas Hall
21. Montecito Hall
22. Alamitos Hall
23. Aliso Hall
24. Music
24A. Modular Surge Space
24B. Modular Surge Space
24C. Modular Surge Space
24D. Modular Surge Space
24E. Modular Surge Space
24F. Modular Surge Space
24G. *Music Center Addition*
25. Drama/Theater
26. University Plaza
26A. Student Orientation Center
27. Water Filtration Facility
28. Fruit and Crop/Greenhouse
28A. *Plant Sciences Laboratory (Temp.)*
28D. Glasshouse
28E. Greenhouse Expansion
29. Arabian Horse Center
29A. Horse Arena
29B. Weaning Barn
29C. Horse Barn
29D. Hay Storage Barn
29E. *Covered Arena & Round Pen*
29F. *Equipment/Storage/Waste*
29G. *Educational Support Wing*
30. Agriculture Unit
31. Poultry Unit
32. Beef Unit
32A. Beef Unit Shed
33. Feed Mill Unit
34. Meat Processes Unit
35. Bronco Student Center (BSC)
35A. Kellogg Art Gallery
35B. *BSC Study Lounge Expansion*
35C. *BSC Conference Center*
37. Swine Unit
37B. Sheep & Swine Storage
38. Sheep Unit
38B. Wool Storage Shed
39. Lambing Barn - Bldg
41. Darlene May Gymnasium
42. Bronco Recreation and Intramural Complex (BRIC)
42A. Restroom Building
42B. BRIC Pool Maintenance
42C. BRIC Pool
42D. *BRIC Expansion*
43. Kellogg Gymnasium
43A. *Kellogg Gymnasium Expansion*
44. *Student Health and Wellness Center*
45. Agriculture Engineering
46. Health Service
47. Ag Eng Tractor Shop
47A. Old Rose Float Office
48. Custodial Services
49. Beaver House
49A. FPM Plumbing Offices
50. Ag Storage & Blacksmith Shop
52. Commons Building
53. Ag Implement Storage
54. Vista de Las Estrellas
55. Kellogg Foundation Services
57. Palmitas Hall (not in use)
58. Cedritos Hall (not in use)
59. La Cienega Center (not in use)
60. Vista Bonita
61. Vista Del Sol
62. Vista de Las Montanas
63. Vista De La Luna
64. Rose Float Lab
65. Ag Pesticide Storage/Restrooms
66. Bronco Bookstore
67. Equine Research Facility
68. *AHC Multi-Purpose Facility*
69. Mechanical Yard
70. Los Olivos Commons (not in use)
71. Housing Maintenance Building
72. Centerpointe Dining Commons
73. Sicomoro Hall
74. Secoya Hall
75. Purchasing and Receiving
75A. Purchasing Warehouse
76. Kellogg West Education / Dining
76A. Kellogg West Hillside
77. Kellogg West Main Lodge
78. Kellogg West Addition Building B
79. Collins College of Hospitality Mgmt
79A. Collins College of Hospitality Mgmt
79B. Collins College of Hospitality Mgmt
80. Marriott Learning Center and Lundberg Hall
81. Physical Plant Office
81A. EH&S Risk Management Modular Space
82. Physical Plant Warehouse
82A. Carpenter Shop
83. Auto Shop and Shelter
84. Mini Warehouse
85. I-Poly High School
85A. *I-Poly High School Modular*
85B. *I-Poly High School Expansion*
86. English Language Institute
86A. English Language Institute
86B. English Language Institute
86C. English Language Institute C
89. Interim Design Center
89A. Interim Design Center (Studios)
89B. Interim Design Center Faculty Offices
91. Temporary Administration Offices
92. Laboratory Care Facility
94. University Office Building
95. Multi-Culture Center
96. Paint Shop
97. Campus Center
98. Classroom/Lab/Admin Bldg
101. Facilities Management Storage
102. Physical Plant Storage
103. Facilities Management Pesticide
104. Facilities Management Storage
105. Rose Float Laboratory
105A. Rose Float Lab - HFF
105B. Rose Float Lab - Deco/Design
105C. Rose Float Lab - Machine/Hydraulics
106. Parking Structure I
107. Parking Structure II
109. Public Safety and Parking Services
111. Manor House
111A. Manor House Garage
112. University House
112A. Kellogg House Garage
113. Kellogg Guest House
114. Campus Residence
115. Campus Residence
116. Children's Center
117. Center for Turf, Irrigation & Landscape Technology
118. Hazardous Waste Material Storage
119. Restrooms (Rose Garden)
121. Student Services Building
122. *Recreational Fields and Support Facilities*
123. PE Storage (Football)
124. Restrooms (Football Field)
125. Restrooms PE Field
126. *Soccer Field and Kellogg Stadium Replacement*
127. *Softball Facility*
132. Soil Science Storage
133. *Bronco Mobility Hub*
136. Ag Engr Storage
137. Crops Storage
138. Ag Fuel Facility
139. Pump House Well #2
140. Pump House Well #1
141. Pump-House-Booster (Cistern)
142. Pump House - Lower Reservoir
143. Upper Reservoir
144. Lower Reservoir
150. MASA Building
160. Swine Shelter
162. College of Business Administration (B)
163. College of Business Administration (C)
164. College of Business Administration (A)
191. Electrical Substation
192. Electrical Switchgear
193. Central Plant-Chiller
194. Forest Lawn Pump House
200. University Village I
201. University Village III
205. University Village II
208. Western Antique Power Storage
209. Lyle Center Commons
209A. Lyle Center Lecture Seminar
209B. Lyle Center Lecture/Classroom
209C. Lyle Center Sunspace
209D. Lyle Center Riverfront
210. Landlab Information Center
211. Agriscapes
213A. Agriscapes Greenhouse A
213B. Agriscapes Greenhouse B
213C. Agriscapes Greenhouse C
213D. Agriscapes Greenhouse D
213E. Agriscapes Greenhouse E
213F. Agriscapes Greenhouse F
213G. Agriscapes Greenhouse G
213H. Agriscapes Greenhouse H
214. Food Production Container
215. Innovation Village, Phase V
216. Innovation Village, Phase IV
217. *Children's Center*
218. American Red Cross Headquarters
219. Innovation Village, Phase III Office/Research
220A. Center for Technology, Training and Incubation
220B. Center for Technology, Training and Incubation
220C. Center for Technology, Training and Incubation
250-251. *Student Housing Phase II*
252-253. *Student Housing Phase III*
300. Pump House Well #4
301. Onion Shed
302. West Barn
303. East Barn
304. North Barn
305. South Barn
306. Industrial Waste Pump House
350. Modular Data Center
443. Baseball Athletics Locker Facility

LEGEND:
Existing Facility / *Proposed Facility*

NOTE: Existing building numbers correspond with building numbers in the Space and Facilities Database (SFDB)

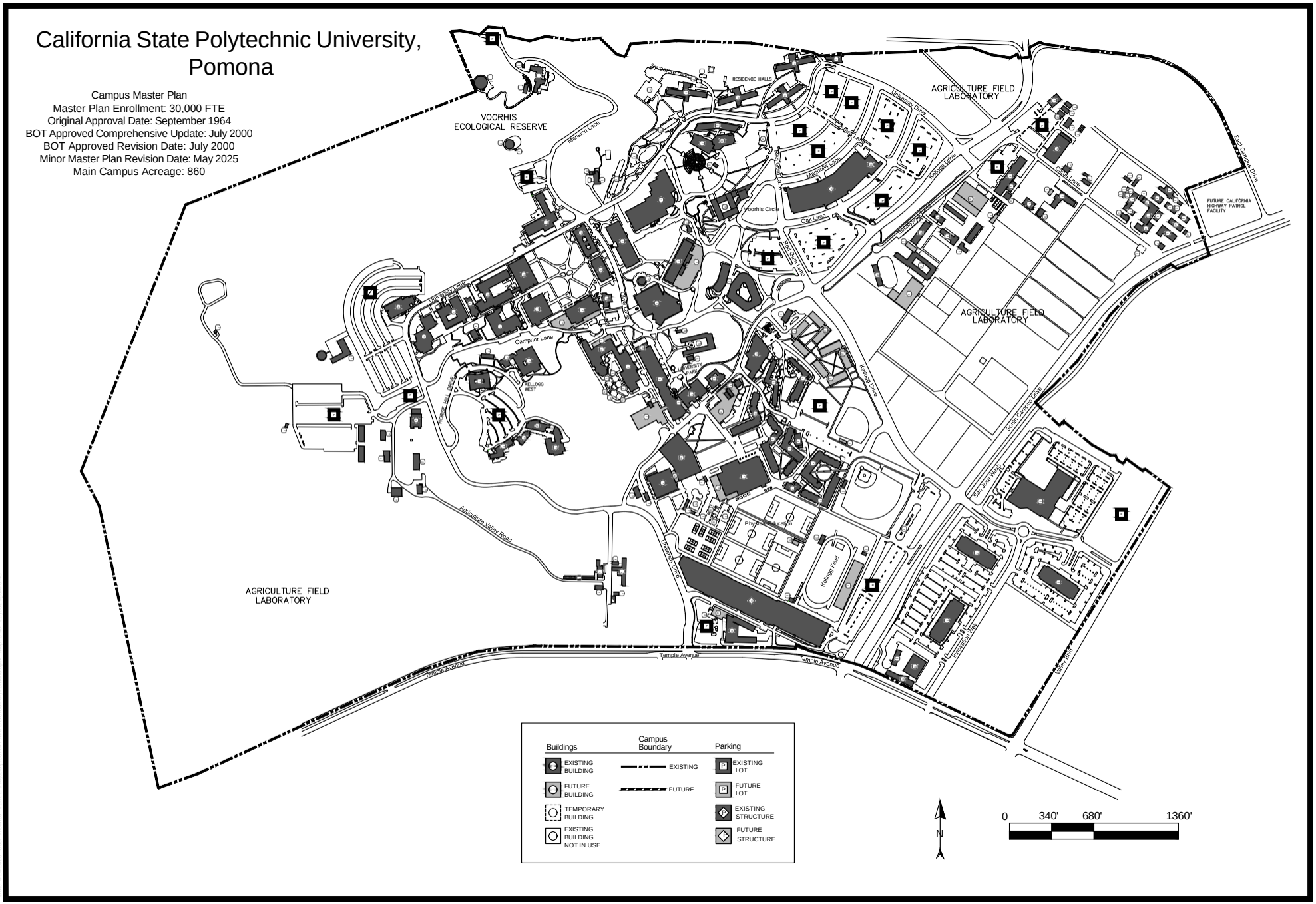
Date: 6/26/2025 User: khoimes Path: Z:\Projects\138720\MAPDOC\CalPolyPomona.aprx Map: 3-4A Layout: figure 3-4A

SOURCE: Cal Poly Pomona 2025

FIGURE 3-4A
Proposed Campus Master Plan
Cal Poly Pomona Campus Master Plan EIR

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SOURCE: Cal Poly Pomona 2025

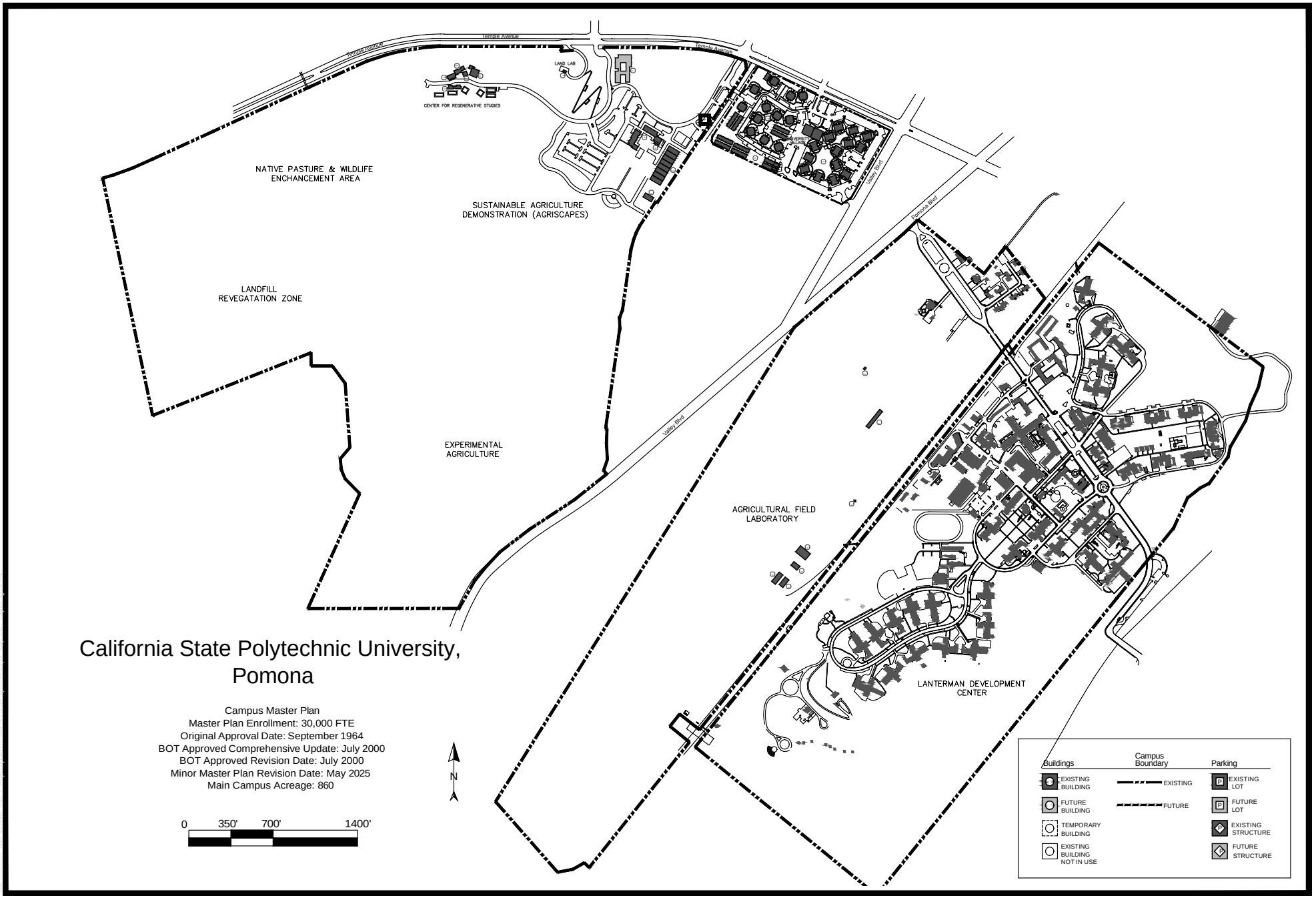
FIGURE 3-4B

Proposed Campus Master Plan

Cal Poly Pomona Campus Master Plan EIR

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SOURCE: Cal Poly Pomona 2025

FIGURE 3-4C

Proposed Campus Master Plan

Cal Poly Pomona Campus Master Plan EIR

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Table 3-2. Proposed Master Plan Development

Campus Space	Beds	Approximate Gross Square Feet
Existing Occupied Space		
All Campus Facilities[1]	N/A	5,884,937
Student Housing[2]	4,043	N/A
Total Existing	**4,043**	**5,884,937**
Projects Approved but Not Yet Constructed		
Solar Parking Lot Canopy Arrays – 8,500 megawatt-hours (Lots F1, F2, F3, F4, F5, F8, F9, F10, M, and Lyle Center)	N/A	N/A
Lyle Center Renovation	N/A	13,980
Plant Diagnostics Lab	N/A	800
Student Housing Replacement Project (Phase II)	840	231,000
I-Poly High School Temporary Office Modular in Lot K	N/A	1,536
The "Reds" Traditional Halls Demolition and Site Restoration Encinitas Residence Hall (Building 20) Montecito Residence Hall (Building 21) Alamitos Residence Hall (Building 22) Aliso Residence Hall (Building 23)	−814	−149,664
Total Pending or Approved Space	**26**	**97,652**
New Construction		
Campus Center and Interdisciplinary Academic Resources Building (Building 10)	N/A	155,000
(NT) Engineering Graduate Building (Building 14)	N/A	80,000
Student Housing Replacement (Phase III) (Buildings 252–253)	1,040	275,000
Children's Center Replacement (Building 217)	N/A	20,000
Student Health and Wellness Center Replacement (Building 44)	N/A	42,000
Bronco Student Center Conference Center Expansion (Building 35C)	N/A	73,000
Softball Facility	N/A	8,000
Renovation		
(NT) Library Renovation (fire/life/safety/seismic) (Building 15)	N/A	218,000
(NT) Classroom/Lab/Administration Building (Buildings 98B/C/P)	N/A	102,000 + 10,000 additional
Music Building Major Renovation and Addition (Building 24)	N/A	43,434 + 15,000 additional
Bronco Student Center Renovation, Addition, and Site Improvements (Building 35)	N/A	129,000 + 13,000 additional
Arabian Horse Center Renovation and Event Center (Building 29)	N/A	55,907 + 31,933 additional
(NT) College of Letters, Arts and Social Sciences (Building 5) Total Renovation/Seismic Upgrade	N/A	76,600

Table 3-2. Proposed Master Plan Development

Campus Space	Beds	Approximate Gross Square Feet
(NT) College of Environmental Design Total Renovation/Seismic Upgrade (Building 7)	N/A	51,000
(NT) Old Administration Total Renovation (Building 1)	N/A	82,000
(NT) College of Science Total Renovation (Building 8)	N/A	136,300
College of Agriculture Total Renovation (Building 2)	N/A	43,200
College of Education and Integrative Studies Major Renovation (Building 6)	N/A	29,700
Drama and Theatre Building Total Renovation or Replacement (Building 25)	N/A	45,795
(NT) Kellogg West Renovation and Fire/Life/Safety/Seismic Upgrades (Buildings 76, 76A, 77, 78)	N/A	42,600
(NT) College of Engineering Total Renovation (Building 9)	N/A	137,900
(NT) Engineering Labs Limited Renovation (Building 17)	N/A	12,000
University Offices Major Renovation (Building 94)	N/A	35,000
ROTC Relocation and Site Reuse (Buildings 13B–D)	N/A	5,390
I-Poly High School Expansion of Multipurpose Recreational Center (Building 85)	N/A	20,000 + 10,000 additional
Recreational Fields and Support Facilities	N/A	2,000
Soccer Field and Kellogg Stadium Replacement	N/A	10,000
(NT) Darlene May Gymnasium Renovation (Building 41)	N/A	31,750
Bronco Recreation and Intramural Complex Expansion (Building 42)	N/A	119,382 + 35,000 additional
(NT) Kellogg Gymnasium Title IX Renovation (Building 43)	N/A	114,000
Demolition		
Darlene May Gymnasium (Building 41)	N/A	−31,750
Campus Center/Marketplace (Building 97)	N/A	−39,000
(NT) Art Department/Engineering Annex (Building 13)	N/A	−53,845
Music Department Modulars (Buildings 24A–F)	N/A	−9,120
Student Health and Wellness Center Replacement (Building 46)	N/A	−21,645
Bronco Bookstore (Building 66)	N/A	−46,500
Children's Center Replacement (Building 116)	N/A	−4,808
English Language Institute (Buildings 86A–C)	N/A	−13,080
Mobility and Circulation Improvements		
(NT) New Campus Transit Center (Bronco Mobility Hub) (Building 133)	N/A	30,000
(NT) Kellogg Drive and East Campus Drive Roadway Reconfiguration (including I-10 Gateway)	N/A	N/A
(NT) Campus Loop Improvements and Pedestrian Malls	N/A	N/A
Signage and Gateway Improvements	N/A	N/A

Table 3-2. Proposed Master Plan Development

Campus Space	Beds	Approximate Gross Square Feet
Utility Infrastructure Improvements		
(NT) Well Water and Water Treatment Plant Expansion (Building 27)	N/A	N/A
(NT) Lower Reservoir Tank Replacement (Building 144)	N/A	N/A
Spadra Well Waterline Extension	N/A	N/A
Totals		
Total Existing and Already Approved	*4,069*	*5,982,589*
Total New Master Plan Building	*1,040*	*809,933*
Total Building Demolition	*N/A*	*219,748*
Total Net Campus Building (Master Plan Buildout)	*1,040*	*590,185*
Total Cal Poly Pomona (Existing and Approved + Proposed Master Plan)	**5,109**	**6,572,774**

Notes: (NT) = near-term project.

1 All Campus Facilities includes all buildings within the campus. These facilities include those for academics, student support services, student housing, offices, and maintenance.

2 The total beds on campus are calculated as the sum of beds from each residence hall currently on campus, excluding the "Greys."

3.6.1 Academic and Student Support Services Facilities

The proposed Master Plan would update and better utilize academic and student support services facilities throughout the campus. The proposed Master Plan would include major renovation of the College of Letters, Arts, and Social Sciences; College of Environmental Design; Old Administration Building; College of Science; College of Agriculture; College of Education and Integrative Studies; the Theatre; Kellogg West; Engineering Labs/College of Engineering; and University Office Building. Replacement, new construction, or expansion projects include the New Campus Center and Interdisciplinary Academic Resources Building; Engineering Graduate Building; New Child Care Center; Conference Center and Mixed-Use Building; Student Health and Wellness Center; Music Building Renovation and Addition; the Bronco Student Center Renovation, Addition, and Site Improvements; and the Bronco Mobility Hub. Demolition of the English Language Institute (Buildings 86A–C), Campus Center (Building 97), Art Department/Engineering Annex (Building 13), Student Health and Wellness Center (Building 46), and Child Care Center (Building 116) would occur to accommodate new construction. See Section 3.7, Near-Term Projects, for additional information about near-term academic and student support services projects.

3.6.2 Student Housing

The proposed Master Plan proposes a student housing replacement project. Student Housing Replacement Phase III (Buildings 252–253) would provide 1,040 beds in two mid-rise buildings. An emergency diesel generator (500 horsepower) would be required for emergency safety systems during a power outage. With the existing beds on the main campus and the 840 new beds proposed as part of a previously approved and environmentally cleared student housing replacement project, the proposed Master Plan would provide for a total of 5,109 beds (Cal Poly Pomona 2016). No student housing projects are proposed for the near term.

3.6.3 Athletic and Recreational Facilities

The proposed Master Plan includes the renovation and limited expansion of existing athletic and recreational facilities, designed to support student-athletes. Renovation and improvement projects include improvements to the recreation fields and major/total renovations of the Darlene May and Kellogg Gymnasiums. New construction and expansion projects include a replacement soccer, track, and field stadium; a new women's softball field; and expansion of the BRIC. In the longer term, demolition of the Darlene May Gymnasium would occur after the BRIC expansion project occurs. See Section 3.7, Near-Term Projects, for additional information about near-term athletic and recreation projects.

3.6.4 Mobility and Circulation Improvements

The proposed Master Plan prioritizes campus-wide improvements that enhance pedestrian and bicyclist safety and expand access to public transit opportunities. The proposed Master Plan includes Kellogg Drive and East Campus Drive roadway reconfiguration improvements, which include an I-10 Gateway. The proposed Master Plan also involves improvements to the existing Campus Loop, including the repaving and restriping of University Drive as well as road improvements for shuttles. A new campus transit center (Bronco Mobility Hub) is proposed to provide a central place to make transportation connections and access services and information. The campus is also developing a Transportation Demand Management plan that will identify demand management and marketing strategies to reduce single-occupant vehicle commutes to campus. Wayfinding and signage would be improved for pedestrian/bikeways, pedestrian malls, and multimodal malls, with lighting, signage, and marked crossings (using color and texture) to enhance pedestrian and bicyclist safety. The Master Plan would result in no net change in parking spaces. See Section 3.7, Near-Term Projects, for additional information about near-term mobility and circulation projects.

3.6.5 Utility Infrastructure Improvements

The proposed Master Plan would advance the backlog of deferred maintenance projects and integrate this work into the Five-Year Capital Outlay Plan for the campus. Projects range from building system upgrades (fire alarm system; elevators; heating, ventilation, and air conditioning [HVAC], etc.) to infrastructure repair and capital renewals and upgrades. Infrastructure repair and upgrades would occur for the existing potable water, sewer, stormwater, gas, and electrical systems. One emergency diesel generator would be installed with the proposed Student Housing Replacement Phase III (Buildings 252–253) to provide for emergency safety systems during a power outage; no other emergency generators are anticipated. See Section 3.7, Near-Term Projects, for additional information about near-term utility infrastructure projects.

3.6.6 Sustainability and Resiliency

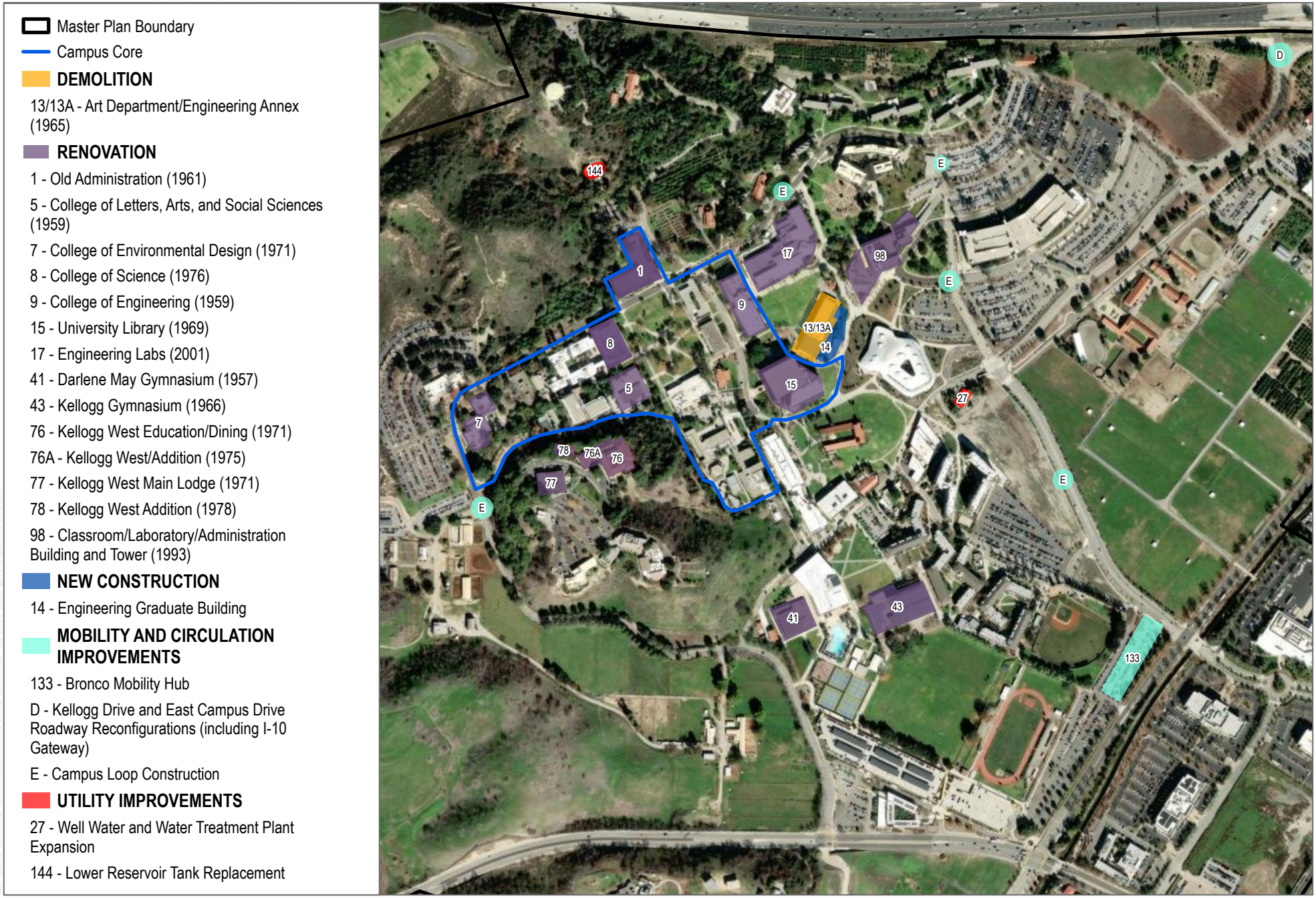
The proposed Master Plan would expand on-campus renewable energy production with the installation of photovoltaic solar shades on building roofs and solar shades between buildings. In accordance with the 2024 CSU Sustainability Policy, all new buildings and major building renovations would be designed and built to meet or exceed the minimum requirements equivalent to LEED Silver status, while striving for LEED Gold or Platinum. Additionally, new construction and renovation projects would exceed all applicable energy codes and regulations (Building Energy Efficiency Standards, Title 24 CCR Section 6) by 10%. Other relevant elements of the 2024 CSU

Sustainability Policy also apply to proposed Campus Master Plan development and will be implemented as described in the policy.

3.7 Near-Term Projects

Projects anticipated to be constructed within the first 5 to 10 years following proposed Master Plan approval (near-term projects) are described and evaluated in detail in this document to provide comprehensive environmental clearance. The complete list of near-term projects and a description of each are presented below. Figure 3-5, Proposed Near-Term Projects, provides approximate locations and building footprints.

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SOURCE: California State Polytechnic University, Pomona 2024; World Imagery

Cal Poly Pomona is in the process of auditing and updating their building information (names/numbers). There may be future inconsistences due to these changes.

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0 375 750 Feet

FIGURE 3-5

Proposed Near Term Projects

Cal Poly Pomona Campus Master Plan EIR

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3.7.1 New Construction

Engineering Graduate Building

The new Engineering Graduate Building (Building 14) would support the continued growth of the College of Engineering, with new facilities to consolidate the graduate programs and space for student research labs. The new building would be located southeast of the existing Engineering Building and would have a total building area of approximately 80,000 GSF. The new building would be up to three stories in height.

3.7.2 Building Renovations

College of Letters, Arts, and Social Sciences

The total renovation of the 76,600 GSF College of Letters, Arts, and Social Sciences (Building 5) would address deferred maintenance and required code upgrades, including seismic reinforcement as well as replacement of building systems and the exterior envelope for greater efficiency and sustainability. The interior would be reconfigured to meet strategic and academic plan goals, with active learning classrooms, spaces for study and collaboration, and shared faculty and departmental workspaces.

College of Environmental Design

The total renovation of the 51,000 GSF College of Environmental Design (Building 7) would address deferred maintenance and required upgrades for seismic reinforcement, building systems, and exterior envelope for efficiency and sustainability. The interior would be reconfigured to expand usable space and better utilize the courtyard for “hands-on” project space.

Kellogg West Buildings

This project would provide a seismic retrofit for the 42,600 GSF Kellogg West Conference Center (Building 76). Renovation would also involve elevator and roof upgrades. Fire, life, and safety upgrades, as well as HVAC improvements, are proposed for the Main Lodge and Kellogg West Addition (Buildings 77 and 78).

Engineering Labs and College of Engineering

The 12,000 GSF Engineering Labs (Building 17) and 137,900 GSF College of Engineering (Building 9) renovation would address deferred maintenance and make required code upgrades, including the total replacement of all building systems and improvements to the exterior envelope for efficiency and sustainability. The interior would be reconfigured to meet active learning space standards and to add lab capacity, as needed, to advance strategic and academic goals for the College of Engineering.

Old Administration

This major renovation of the Old Administration (Building 1) would address deferred maintenance and required upgrades for seismic reinforcement and the building systems of the 82,000 GSF Old Administration Building. The interior would be reconfigured to meet strategic and academic plan goals with more-efficient resources and workspaces.

College of Science

The project would include repurposing space in the 136,300 GSF College of Science (Building 8) for instructional labs. This major renovation would address deferred maintenance and required code upgrades for seismic reinforcement and building systems as well as potential improvements to the exterior envelope, including the roof and windows, for greater efficiency and sustainability. Where needed, the interior would be reconfigured to meet strategic and academic plan goals and the needs of the College of Science.

Library

The renovation of the original 218,000 GSF Library (Building 15) includes several site improvements, such as the demolition of the existing pedestrian bridge, widening of the fire lane and turnaround, and installation of two additional fire hydrants. Interior improvements to the library include staircase and elevator improvements, drinking fountain replacement, full restroom renovation, lighting upgrades, acoustical ceiling system upgrades, and wall and floor replacement.

Classroom/Lab/Administration

The 102,000 GSF Classroom/Lab/Administration Building (Building 98) renovation would involve the renovation of the remaining classroom and laboratory wing, reconstructed utility connections, and landscaping and hardscape improvements. An approximately 10,000 GSF addition would be constructed in place of the previously demolished portion of the building. Renovation of the classroom and laboratory wing would include an HVAC system upgrade, replacement of plumbing fixtures, wall and ceiling renovation, lighting and electrical upgrades, and acoustical upgrades.

3.7.3 Athletic and Recreational Facilities

Darlene May Gymnasium Renovation

The 1958 Darlene May Gymnasium (Building 41) is 31,750 GSF and houses lockers and restrooms that do not meet the gender equity requirements of Title IX. The project involves the immediate targeted renovation of the restroom and locker facilities specifically to meet current code requirements for accessibility (Americans with Disabilities Act). Then locker and restroom facilities for female student-athletes would be installed within the Kellogg Gymnasium facility. In the longer term, the Darlene May Gymnasium would be demolished to accommodate the expansion of the BRIC to meet the needs of a growing student body.

Kellogg Gymnasium Improvements to this facility would initially involve the renovation of the 114,000 GSF Kellogg Gymnasium (Building 43) to provide locker and restroom facilities for female student-athletes to meet the intentions of Title IX. In the longer term, the proposed Master Plan includes major renovation and a small expansion of the Kellogg Gymnasium facility, including replacement of major building systems and accommodation of uses from the Darlene May Gymnasium (to be demolished for the BRIC expansion).

3.7.4 Demolition

Art Department/Engineering Annex Building

The Art Department/Engineering Annex Building and ROTC trailers (Buildings 13 and 13B–D) total 53,845 GSF and are located north of the Library (Building 15). Building 13 will be demolished and replaced with the proposed new Engineering Graduate Building, and ROTC Buildings 13B–D will be relocated.

3.7.5 Mobility and Circulation Improvements

Kellogg Drive-East Campus Drive Improvements (including I-10 Gateway)

The Kellogg Gateway project is intended to enhance campus identity, entry, and wayfinding and to improve safety by relocating traffic around the campus. This project is being proposed as a Transportation Demand Management improvement. The project includes:

- New controlled intersections on Kellogg Drive at East Campus Drive and University Drive
- Conversion of East Campus Drive from a one-way road to a two-way road
- Intersection improvements at East Campus Drive and South Campus Drive (with left turn added)
- New signage to direct traffic around the campus to access I-10 (on South Campus Drive at both Kellogg Drive and East Campus Drive)
- Signage and gateway elements including monument sign, landscaping, and lighting with banners
- Narrowing of Kellogg Drive to reduce vehicular speed and enhance pedestrian safety with wider sidewalks, pedestrian-scale lighting, and enhanced crosswalks

New Campus Transit Center (Bronco Mobility Hub)

The approximately 30,000 GSF Bronco Mobility Hub would be a centralized space to make transportation connections and access services and information. This project is being proposed as a Transportation Demand Management improvement. The proposed location is Parking Lot B (north), off South Campus Drive and Kellogg Drive, to minimize the impact on Foothill Transit route schedules and to seamlessly connect with the campus shuttle loop. Existing Foothill Transit bus stops on Temple Avenue and South Campus Drive will be consolidated at the new Bronco Mobility Hub, reducing the number of pedestrian crossings and consequently reducing traffic backups behind the buses. The Bronco Mobility Hub is envisioned as a front door to the campus, with wayfinding and transportation information to support alternative transportation modes including:

- Foothill Transit bus plaza with 10 bus bays and passenger amenities
- Preferential parking spaces for carpools/vanpools
- Car-share, bike-share, e-bike, and e-scooter rental programs
- Bicycle lockers/storage
- Electric vehicle charging stations
- Pick-up/drop-off areas for rideshare vehicles and ride-hailing services
- University Police guard shack and operator restroom facility
- On/off-site traffic and bus access improvements; temporary replacement parking

Campus Loop Construction

This project is being proposed as a Transportation Demand Management improvement. A proposed circulating shuttle would loop around the core of the campus in a clockwise direction, with stops proposed at Camphor Lane, University Quad, the rose garden, Parking Structure 1, and the Bronco Mobility Hub. Until the Bronco Mobility Hub project is completed, one or more temporary stops may be needed to serve the temporary and overflow parking lots. A future stop is planned along Kellogg Drive to serve future student housing projects. The required street and shuttle stop improvements would be phased, with the first phase involving the resurfacing and striping of the shuttle lane on University Drive between Camphor Lane and Red Gum Lane. This work would require widening the road in two places, adding lane markers and signage, and consolidating shuttle stops. Later phases would extend the dedicated lane and improve the north end of Red Gum Lane, the west portion of University Drive (which requires widening the road and adding a curb and gutter), and connecting the shuttle lane along Kellogg Drive to loop through the new Bronco Mobility Hub.

3.7.6 Utility Infrastructure Improvements

The proposed improvements to Cal Poly Pomona's domestic water system and other water conveyance infrastructure are briefly summarized below. None of these improvements are anticipated to result in any changes to the executed 1982 agreement or 2012 amendment or Memorandum of Understanding, or to Cal Poly Pomona's obligation and intent to continue the provision of reclaimed water for irrigation purposes to Forest Lawn-Covina Hills.

Well Water and Water Treatment Plant Expansion

This project would involve the installation of a volatile organic compound wellhead treatment system at Well 2 to expand the availability of source groundwater for potable use. It will include repairs or replacement of existing controllers and sensors, upgrading the Supervisory Control and Data Acquisition system, and adding an additional reverse osmosis water treatment train to expand the system capacity to produce an additional 300,000 gallons per day of domestic water. The system currently has capacity to treat 792,000 gallons per day.

Lower Reservoir Tank Replacement

This project would involve the installation of a new 570,000-gallon welded steel tank to replace the existing lower reservoir tank. The tank would be installed at the same location as the existing tank at the lower reservoir site. The new tank would provide the domestic water storage needed for distribution and would provide backup storage. The new water storage tank would supply water to the fire suppression system. The existing tank would be demolished and removed accordingly.

3.8 Project Design Features and Continuing Best Practices

This section describes the Project Design Features (PDFs) and Continuing Best Practices (CBPs) proposed as part of the Master Plan and included in analytical assumptions for purposes of impact determinations in this EIR. The PDFs and CBPs are numbered and cited throughout the EIR where they are relevant to the environmental analysis and, where applicable, have been incorporated into the technical analysis to determine impact significance. The PDFs and CBPs will be incorporated into the Master Plan's Mitigation Monitoring and Reporting Program, which will be adopted by the CSU Board of Trustees when they consider approval of the proposed Master Plan. The PDFs

provided below are practices that would be implemented as part of the proposed Master Plan. The CBPs provided below are best practice recommendations which may be applied to the identified historic resources during Master Plan implementation (see Section 4.6 for further detail).

Project Design Features

- **PDF-AQ-1:** For proposed Master Plan projects utilizing off-road diesel-fueled equipment, all diesel-fueled off-road construction equipment greater than 75 horsepower shall be zero-emission or equipped with California Air Resources Board (CARB) Tier 4 Final-compliant engines. Alternatively, CARB Tier 2- or Tier 3-compliant engines can be used if CARB Level 3 Verified Diesel Emissions Control Strategy (VDECS) filters are added to each piece of off-road diesel-fueled equipment. This measure does not apply to linear components (e.g., pipeline connections), as sensitive receptors would not be exposed for long durations.
- **PDF-AQ-2:** Diesel-fueled operational equipment (e.g., emergency generators) greater than 75 horsepower shall be zero-emission or equipped with California Air Resources Board (CARB) Tier 4 Final-compliant engines. Alternatively, CARB Tier 2- or Tier 3-compliant engines can be used if CARB Level 3 Verified Diesel Emissions Control Strategy (VDECS) filters are added to each piece of diesel-fueled equipment.
- **PDF-BIO-1:** Prior to finalization of Master Plan project designs, an International Society of Arboriculture (ISA) Certified Arborist will review the proposed construction plans, visit the project sites, and assess the condition, health, and structure of trees proposed to be trimmed or removed, as well as trees adjacent to proposed work areas that may be affected during or after individual project implementation. All specimens of the following tree species/sizes will be inventoried, mapped, and characterized in terms of species, size (trunk diameter, tree height, crown spread), and health and structural condition:
  - California black walnut *(Juglans californica)*, California redwood *(Sequoia sempervirens)*, and oak trees of the genus Quercus measuring 4 inches or more in cumulative diameter at 4.5 feet above the tree's natural grade
  - All tree species measuring 12 inches or more in cumulative diameter at 4.5 feet above the tree's natural grade

  The proposed Master Plan will seek to preserve all inventoried trees to the greatest extent possible. Prior to the start of construction activities, a tree management and replacement plan will be prepared by an ISA Certified Arborist. The tree management and replacement plan will apply to all inventoried specimens within 25 feet of construction activities or to specimens that an ISA Certified Arborist determines may be impacted as a result of Master Plan implementation and will include, at a minimum:
  - Best management practices and maintenance measures to ensure protection of preserved trees during and following construction.
  - An impact assessment for those inventoried specimens that may be directly or indirectly impacted during and/or after construction. Where preservation is not possible, as determined by an ISA Certified Arborist, recommendations regarding replacement will be provided, including species, size, location, and number of replacement trees.
  - Tree replacement and planting standards to ensure the success of replacement trees. Replacement trees will be installed per ISA tree planting specifications under the direction and supervision of an ISA Certified Arborist and will be monitored by an ISA Certified Arborist for the first 5 years after installation. The ISA Certified Arborist will, on an annual basis, document diameter, height above grade, measured

dripline, appearance and health conditions, physical description, and photographs of each installed replacement tree to ensure replacement success.

- A program for harvesting acorns/walnuts/cones from the campus trees or nearby San Jose Hills trees to serve as seed source for replacement plantings to ensure appropriate genetic adaptations are preserved.

- **PDF-HWQ-1:** Develop project-specific best management practices for all individual Master Plan projects regardless of acreage, which will include treatment controls; operating procedures; practices to control site runoff, spills and leaks, sludge or waste disposal, or drainage from raw material storage; and structural and non-structural measures. An erosion control plan will be developed and implemented for individual projects that include soil and/or vegetation disturbance in or adjacent to open space areas to prevent sediment transport into and within native vegetation.
- **PDF-HWQ-2:** Implement effective stormwater management practices, such as installing inlet basin filters at parking lots, collecting and treating stormwater runoff in bioretention basins, and constructing bioswales.
- **PDF-HWQ-3:** Produce less runoff than pre-development conditions or match pre-development conditions, at a minimum.
- **PDF-MWD-1:** To avoid potential conflicts with Metropolitan Water District (Metropolitan) rights-of-way, Master Plan project design plans for any activity in the area of Metropolitan's pipelines or facilities will be submitted to Metropolitan for review and written approval. Any future design plans associated with the Master Plan will be submitted to the attention of Metropolitan's Substructures Team. Master Plan projects and construction procedures will be designed to avoid subjecting Metropolitan's pipes to excessive vehicle, impact, or vibratory loads. For any Master Plan projects that occur within Metropolitan's property, appropriate property rights will be obtained from Metropolitan, such as the granting of a road easement or license. The granting of property rights may be subject to Metropolitan Board of Directors approval. No work will be performed, including potholing or any studies within Metropolitan's property, prior to the execution of an appropriate agreement.
- **PDF-TRA-1:** When individual Master Plan construction projects require significant work within existing roadways, Cal Poly Pomona will require the project contractor to implement a construction traffic control plan. This requirement will be incorporated into construction bid packages. The plans will conform with the current version of the State of California Department of Transportation Standard Specifications, where applicable, and will be reviewed and approved by Cal Poly Pomona prior to implementation. The plans will also be reviewed by the City of Pomona and any other local municipalities that are affected by construction activities, as well as by neighboring memorial park owner Forest Lawn to ensure impacts to its operations are avoided or minimized to the maximum extent feasible. Such notice will be provided sufficiently in advance of construction commencement to allow for the provision of input and development of alternative traffic arrangements, if necessary. The traffic control plan will include any detour plans and/or temporary traffic control devices warranted, per the current version of the California Manual on Uniform Traffic Controls Devices, to provide for public safety, maintenance of access, temporary roadway closures, if needed, and construction-area signage. Cal Poly Pomona will inform emergency services, campus transportation, and transit agencies of any roadway or lane closures and alternative travel routes to ensure adequate access for emergency vehicles when individual Master Plan construction projects will result in temporary lane or roadway closures.

Continuing Best Practices

CBP-1: Strategies for Secretary's Standards Compliance

Proactively identify and document character-defining features within the project area—primary, secondary, and tertiary—to facilitate their preservation and protection.

Document noncontributing features, where additional flexibility for changes and removal exists without adversely impacting the historic property.

If retention of character-defining features is not feasible, replace in-kind, using materials, finishes, profiles, dimensions, and detailing that match the original features.

Ensure new features are compatible in design yet differentiated from character-defining features and historic fabric; avoid reconstructing missing features based on conjectural evidence.

Design additions and new construction to be compatible but differentiated, visually subordinate, and reversible, so that the essential form of the historic property remains intact.

While some project components may not align with all Secretary's Standards, the project as a whole can still be compliant. Project needs and objectives may necessitate the removal of character-defining features. In such cases, a qualified historic preservation professional should assess the impact of any loss of character-defining features on the resource's overall integrity.

CBP-2: Window Rehabilitation for Historical Resources

Identify and document primary, secondary, and tertiary character-defining windows early in the planning phase to support their protection, retention, or rehabilitation. Identify noncontributing windows to identify areas with more flexibility for alteration and/or removal.

Retain, repair, and preserve historic windows and their stylistic elements. These may include dimensions, frame materials and design, glazing type, muntin patterns, profile, and thickness, sills, and paneled or decorative moldings.

When repair is infeasible, replace windows in-kind, to match original sizes and shapes, glazing pattern, materials, finishes, frame profile and thickness, and decorative detailing.

If replacement is necessary, prioritize secondary character-defining windows (or noncontributing windows), as these options offer more flexibility for changes.

Because historic windows are among the most important character-defining features on a historic building, avoid the wholesale removal of historic windows.

Replacing original wood or steel windows with dual-pane vinyl-frame windows is not recommended.

Utilize performance-based solutions under the State Historic Building Code to meet energy standards without negatively impacting historic integrity.

CBP-3: Preservation of Architectural Details

Where deteriorated or missing, architectural details should be repaired or replaced, to the extent feasible, to match originals, based on physical and/or documentary evidence.

Significant architectural details should not be obscured, covered, or destroyed.

Any new elements added to character-defining features should be compatible with the style, size, scale, materials, finishes, and detailing of the historic property overall.

Periodically clean and refinish architectural features that show signs of deterioration, such as deteriorating wood or metal with signs of corrosion.

Clean and prepare surfaces using the gentlest methods possible, to avoid damaging historic materials.

CBP-4: Roof Forms and Features

Character-defining roof features include roof shape and form, height, pitch, eave treatments, and decorative features such as rafter tails, towers, and dormers.

When character-defining features are severely deteriorated or missing, they should be replaced in-kind or with compatible substitute materials.

Replacement materials should match the original in appearance—including dimensions, profile or pattern, texture, and color.

Replacement of missing features should be guided by physical or documentary evidence. Conjectural reconstructions should not be used.

For projects involving roof areas, take care not to cover, damage, or obscure significant roof features, nor to compromise the overall design or detailing of the roof.

CBP-5: Site Plan Design and Landscape Features

Recognize and preserve important spatial relationships between buildings and landscape features. Many campus site plans intentionally incorporated open spaces such as courtyards; new construction should avoid encroaching on these areas.

If character-defining hardscape elements—such as original walkways, planters, or benches—must be replaced, do so in-kind, ensuring that materials and appearance match the original and preserve their intended function.

New paving should be visually compatible with historic paving in terms of material, color, pattern, and layout—whether axial, curving, or otherwise in relation to surrounding features.

All work should be designed to be reversible where possible, ensuring that future removal will not compromise the integrity of the site or its surroundings.

Look for opportunities to introduce new landscaping that aligns with the overall scale and character of the campus. Significant plantings and landscape features should be protected and carefully maintained.

CBP-6: Façade Treatments

Identify and document character-defining features and elevations on the façades of historically significant buildings to support their preservation, maintenance, or sensitive in-kind replacement.

When exterior materials, cladding, or other elements require replacement, new materials should match the original as closely as possible. Reproductions should be informed by physical or historical evidence rather than conjecture.

In cases of severe deterioration, in-kind replacement of original character-defining features may be appropriate. However, widespread replacement should only be considered when original materials are beyond repair. New elements should replicate the originals in material, design, and appearance.

Masonry, wood, and metal surfaces that were historically painted should be repainted when needed. Surface preparation should be done using the gentlest effective methods. Avoid electric sanders, chisels, and chemical strippers, as these can cause significant damage to historic materials.

Removal of incompatible alterations from the past and restoration of original materials and features are encouraged. Restoration of original features should be based on documentary evidence.

CBP-7: Seismic Upgrades

Proactively identify opportunities and options for achieving upgrade objectives while limiting visibility of seismic improvements, to the greatest extent possible.

Avoid removal or damage to character-defining features in design of seismic upgrades, installation and placement.

If exterior bracing is needed, identify non-significant or secondary elevations for their installation (on elevations not visible from the public right-of-way, for example). Avoid unnecessary damage and removal to historic features during construction and installation activities, preserving the character-defining design and materials.

Prioritize using the building interior for any necessary seismic bracing, thereby avoiding changing the exterior design.

If exterior bracing is deemed necessary, take steps to design elements to be compatible with the building's character and style.

Avoid removing character-defining windows to create shear walls.

If it is necessary to remove windows for seismic bracing, identify and document, in conjunction with qualified architectural historian, which windows provide the best options for removal that minimizes impacts to the historic resource.

In planning seismic upgrades, avoid activities such as infilling windows with concrete masonry units, indiscriminate use of anchor bolts on facades or primary exteriors, or removal of historic features that could be braced and anchored in place.

Exposed bracing that strikes a bold, structural tone might be appropriate for certain styles and building types. Other building types/styles may call for more subtle bracing elements.

CBP-8: Americans with Disabilities Act (ADA) Compliance and Access

Install ADA ramps, lifts, and elevators in a manner that preserves character-defining spaces and features.

Whenever possible, place accessibility elements in secondary or non-character-defining areas to avoid potential impacts.

When planning accessible paths of travel, avoid damaging or obscuring character-defining features such as contributing walkways, landscaping, setbacks, and plantings. Explore alternate routes that preserve significant site features.

CBP-9: Additions and New Construction

Identify and document character-defining features that should be considered in the design of building additions and new construction. These features may include siting, scale/height, roofline character and features, windows (type, opening types and sizes, rhythm/placement), exterior wall planes and receding/projecting planes and spaces, materials, and style.

New additions should be compatible with but differentiated from historically significant properties and site features.

For additions, incorporate design elements such as set-backs or hyphens to distinguish between the old and new construction.

Avoid adding higher stories to historically significant buildings; identify opportunities for increasing building footprint rather than adding height.

Additional stories may be appropriate if set back on the roof to minimize visibility.

In designing new construction adjacent to historic properties, or additions to historic properties, avoid creating a stylistic copy of the original historic building; new design should be compatible but differentiated.

Additions and new construction should be visually subordinate and not detract attention from the historic resource, in terms of scale and architectural style.

3.9 Project Approvals and Intended Uses of the Environmental Impact Report

As indicated in Chapter 1, Introduction, this EIR is an informational document for both agency decision-makers and the public and will be used by the CSU Board of Trustees to evaluate the potential environmental impacts of the proposed Master Plan. The CSU Board of Trustees is the lead agency responsible for certification of this EIR as adequate under CEQA and for the related approval of the proposed Master Plan. This EIR could also be relied upon by state or federal responsible agencies with permitting or approval authority over any project-specific action to be implemented in connection with the proposed Master Plan.

This EIR provides program-level analysis of the proposed Master Plan and project-level analysis of proposed near-term projects and may be used in the future evaluation of individual Master Plan projects. As individual Master Plan

projects analyzed at a program level in this EIR are proposed for implementation, additional environmental review will be conducted to the extent required by CEQA. Any required additional review would occur subsequent to the CSU Board of Trustees' approval of the proposed Master Plan and certification of this Master Plan EIR, at the time such projects are advanced by Cal Poly Pomona for design and construction planning. See Chapter 1 for additional information about when additional environmental review is required. The Cal Poly Pomona campus is an entity of the CSU Board of Trustees, which is the State of California acting in its higher education capacity. Under applicable law, the CSU alone is responsible for governance of its property (see California Education Code Sections 84030 and 84031). As such, although the CSU strives to work with local governments and develop its campuses in a manner compatible with local planning objectives where feasible, as an entity of the State of California, the CSU is not subject to local permitting or planning requirements or regulations.

Table 3-3 identifies the various agency approvals required for approval of the proposed Master Plan and implementation of subsequent Master Plan projects.

Table 3-3. Proposed Master Plan and Related Approvals

Applicable Jurisdiction or Agency	Compliance, Approval, or Permit	Responsible Agency
Master Plan		
CSU Board of Trustees	Certification of the Final EIR	
	Approval of the Cal Poly Pomona Master Plan	
Individual Developments Under the Master Plan		
CSU Board of Trustees	Amendment to the Capital Outlay Program, as necessary	
	Schematic design approval and other related actions and approvals, as necessary	
Division of the State Architect	Plan review	
U.S. Fish and Wildlife Service	Endangered Species Act Incidental Take Permit – Required if federally listed species would be taken	
Caltrans	Encroachment Permit	✓
California Department of Fish and Wildlife	California Endangered Species Act Incidental Take Permit – Required if state-listed species would be taken	✓
	Fish and Game Code Section 1600 Streambed Alteration Agreement – Required if streambeds, waterways, or riparian habitat would be affected	
Regional Water Quality Control Board	National Pollutant Discharge Elimination System Permit (NPDES) Stormwater Pollution Prevention Plan and Notice of Intent to Comply with NPDES Construction Permit	
	Clean Water Act Section 401 Water Quality Certification – Required if jurisdictional wetlands would be filled	✓
State Water Resources Control Board, Division of Drinking Water	Approval of a domestic water supply permit amendment for the addition of a new reservoir, changes to the status of an existing source, and for changes in treatment	✓
	Authority to Construct and/or Permits to Operate for stationary sources (e.g., generators)	✓

Table 3-3. Proposed Master Plan and Related Approvals

Applicable Jurisdiction or Agency	Compliance, Approval, or Permit	Responsible Agency
South Coast Air Quality Management District	Hazardous materials removal and asbestos demolition	
County of Los Angeles	Encroachment permits for projects involving construction in County rights-of-way	
City of Pomona	Encroachment permits for projects involving construction in City of Pomona rights-of-way	
	Approval of new connections to City of Pomona utilities, such as recycled water, sewer, or storm drain	
Three Valleys Municipal Water District	Approval of new potable water connections	

3.10 References

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4.0 Environmental Analysis

This section of the Environmental Impact Report (EIR) presents potential environmental impacts of the project. The scope of the analysis and key attributes of the analytical approach are presented below to assist readers in understanding the manner in which the impact analyses have been conducted in this EIR.

4.0.1 Scope of the Environmental Analysis

The proposed Master Plan would guide the physical development of the campus. Approval of the project does not constitute a commitment to any specific project, construction schedule, or funding priority. As individual Master Plan projects are proposed for implementation, they will be reviewed to determine if additional California Environmental Quality Act (CEQA) review is required, as described in Chapter 2, Introduction. Each development embarked on by the California State Polytechnic University Pomona (Cal Poly Pomona) during the lifespan of the project would be individually reviewed and, if warranted, approved by the California State University Board of Trustees (Board of Trustees). This EIR provides a program-level environmental assessment, which evaluates the environmental effects of the project and focuses on the full development of the campus, as contemplated by the project. Additionally, the near-term projects that are expected to be developed within the first 5 to 10 years of proposed Master Plan approval are evaluated at a project-specific level.

Based on the Notice of Preparation (NOP), as described in Chapter 1, Introduction, this EIR addresses the following topics in detail:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Paleontology
- Greenhouse Gas Emissions
- Hazards, Hazardous Materials, and Wildfire
- Hydrology and Water Quality
- Land Use and Planning
- Noise and Vibration
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

As potential impacts related to Mineral Resources are not likely to be significant under CEQA and CEQA Guidelines (Cal. Pub. Resources Code, Section 21000 et seq.; Cal. Code Regs. tit. 14, Section 15000 et seq.), they are not addressed in this EIR.

4.0.2 Definition of Baseline or Existing Conditions

An EIR must include a description of the existing physical environmental conditions in the vicinity of the proposed Master Plan area to provide the "baseline physical conditions" against which proposed Master Plan-related changes through an approximate planning horizon year of 2040 can be compared. Normally, the baseline condition is the physical condition that exists when the NOP is published (Cal. Code Regs. tit. 14, Section 15125). The NOP for the project was published on April 8, 2024.

Academic year 2023–2024 is used in the EIR as the basis for evaluating the net increase in enrollment and development with the project as it is the year that the NOP was released. Therefore, academic year 2023–2024 will serve as the baseline year for analysis in this EIR. Where 2023–2024 data is not available, the most recent information is used to describe the existing physical conditions. The CEQA Guidelines recognize that the data for establishing an environmental baseline cannot be rigid. Because physical environmental conditions may vary over a range of time, the use of environmental baselines that differ from the date of the NOP is reasonable and appropriate in certain circumstances when doing so results in a more accurate or conservative environmental analysis.

4.0.3 Definition of the Study Area

The study area for each environmental resource topic analyzed in this EIR is identified in each section, and may vary depending on the extent of the area in which impacts could occur. For example, the evaluation of population and housing impacts considers the Southern California Association of Governments (SCAG) region, which includes Los Angeles, Orange, Riverside, Imperial, San Bernardino, and Ventura counties, as this region is the basis for growth forecasts and various regional plans that relate to population and housing impacts. In contrast, geological, soils, and paleontological impacts are assessed only for the project area, which is where such impacts could result with the project. (See Chapter 3, Project Description, for further description of the project area.) The study area for each environmental resource area is defined in the pertinent resource sections in this chapter.

4.0.4 Basis of Impact Analysis

The analyses of impacts in this EIR are based upon varying factors, depending on the primary cause of the impact. Impacts related to biological resources; cultural resources; geology, soils, and paleontology; hazards, hazardous materials; wildfire; and hydrology and water quality are analyzed primarily on the basis of the location and acreage of ground disturbance (the footprint of development) that would result from the project. Impacts related to air quality, greenhouse gas emissions, noise and vibration, population and housing, public services and recreation, transportation and utilities, and energy are analyzed on the basis of the net population increase and the location, type and/or size of development contemplated by the project.

Thresholds of significance are identified and used to evaluate the impacts of the project related to each technical topic and are based on Appendix G of the CEQA Guidelines. The impact analysis in each technical section compares identified impacts to the thresholds of significance and determines the impact's level of significance under CEQA. If the impact would be significant or potentially significant, the analysis identifies feasible mitigation measures to eliminate the impact or reduce it to less than significant, where possible. If the impact cannot be reduced to less than significant after implementation of all feasible mitigation measures, then the impact is identified as significant and unavoidable.

4.0.5 California State University Autonomy

Cal Poly Pomona is an entity of the CSU system, which is a state agency created by the Legislature in the field of public higher education which is charged with the management, administration, and control of the State College System of California (Cal. Const., art. XX, Section 23; see also Ed. Code Section 66600 et seq., 89000 et seq.). With respect to development projects, the Legislature has expressly granted CSU the "full power and responsibility in the construction and development of any state university campus, and any buildings or other facilities or improvements connected with the California State University" (Ed. Code Section 66606). Therefore, the CSU is not subject to local government planning and land use plans, policies, or regulations.

Although there is no formal mechanism for joint planning or the exchange of ideas, Cal Poly Pomona may consider, for coordination purposes, aspects of local plans and policies for the communities surrounding the campus when it is appropriate. The proposed Master Plan would be subject to state and federal agency planning documents described herein but would not be bound by local or regional planning regulations or documents such as the cities of Pomona and Walnut, and the County of Los Angeles general plans or municipal codes. Nonetheless, if warranted, the local or regional regulations are described for informational purposes only, and not as the basis for the determination of significant impact for purposes of CEQA.

4.0.6 Cumulative Impacts Overview

CEQA requires that in addition to project impacts, an EIR must discuss cumulative impacts. Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The cumulative impact is the change in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (Cal. Code Regs. tit. 14, Section 15355).

The CEQA Guidelines clarify a number of issues with respect to cumulative impacts, as follows:

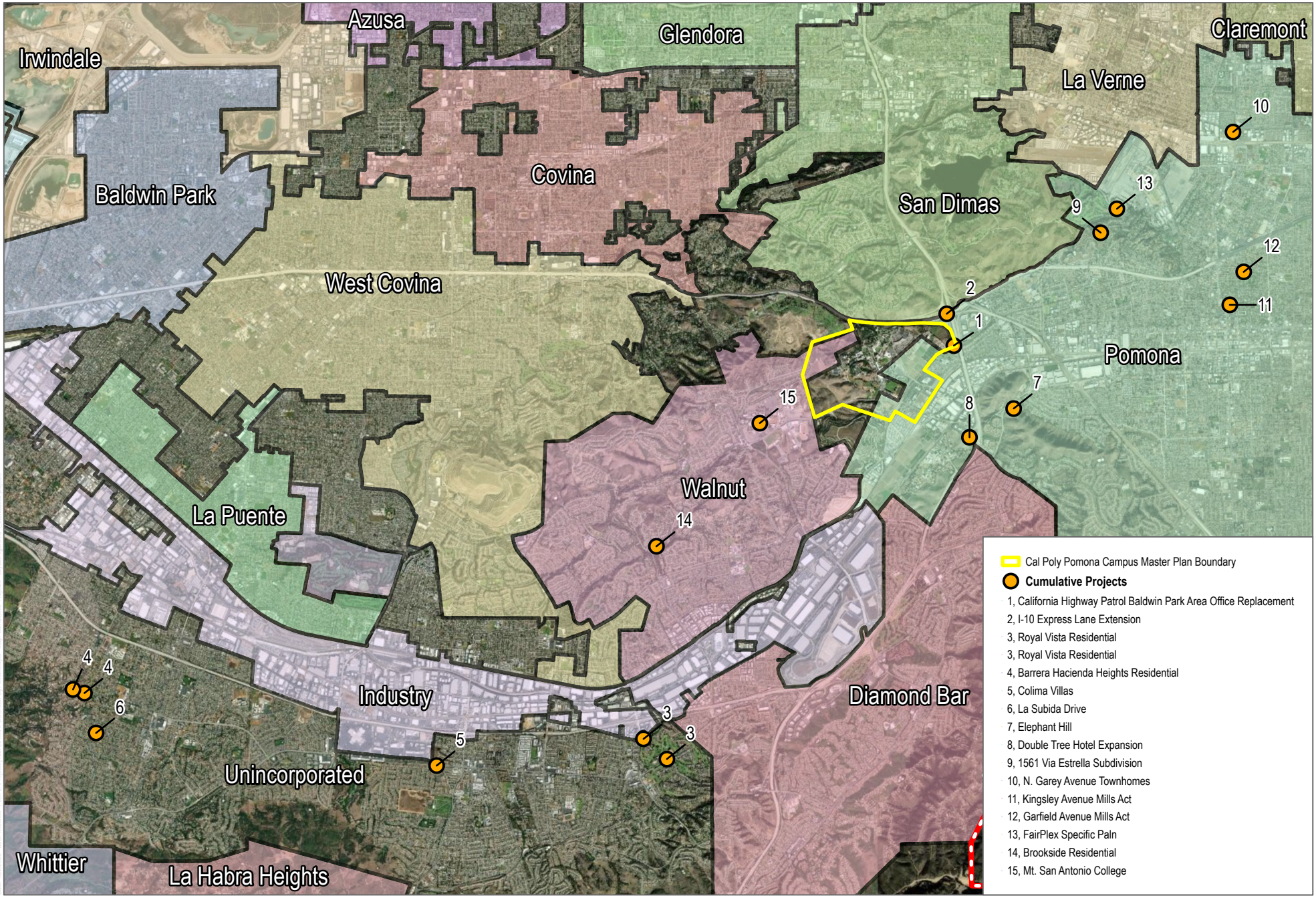
- An EIR should not discuss cumulative impacts to which the project would not contribute.
- If the combined cumulative impact (impacts from other projects combined with the impact from the proposed project) is not significant, then the EIR should briefly indicate why the impact is not significant, and no further evaluation is necessary.
- If the combined cumulative impact is significant, the EIR discussion must reflect the severity of the impact and the likelihood of its occurrence.
- If the combined cumulative impact is significant, the EIR also must indicate whether the project's contribution to that significant cumulative impact will or will not be cumulatively considerable.
- An EIR may determine that the project's contribution is rendered less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact (Cal. Code Regs. tit. 14, Section 15130[a]).

The CEQA Guidelines provide additional guidance with respect to how an adequate cumulative impact analysis might be completed and note that this may be based on:

- A list of past, present, and probable future projects producing related or cumulative impacts, or
- A summary of projections contained in an adopted General Plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact (Cal. Code Regs. tit. 14, Section 15130[b]).

To evaluate the cumulative impacts of the project, the analysis in this EIR uses both of the above methods as appropriate for the cumulative topic being evaluated. For example, this EIR uses 2024 SCAG regional growth forecasts for 2040 in Section 4.14, Population and Housing. In contrast, a list of reasonably foreseeable future projects in the vicinity of the campus is used in Section 4.1, Aesthetics. The cumulative analysis for each topic indicates the geographic area and analytical approach used in the analysis.

The list of reasonably foreseeable future projects in the vicinity of the campus was obtained from nearby jurisdictions during the preparation of this EIR. This list includes projects that have been approved, but not yet constructed, or projects for which an application is pending. This list is not intended to be an all-inclusive list of projects in the region, but rather an identification of projects constructed, approved, or under review in the vicinity of the campus that have some relation to the environmental impacts associated with implementation of the proposed Master Plan. The cumulative projects list is presented in Table 4.0-1. The locations of these projects are shown in Figure 4.0-1, Cumulative Projects. Future details involving the development of the Lanterman Development Center and Innovation Village are not currently known, and they are not further discussed as cumulative projects in this document.



SOURCE: Los Angeles County

DUDEK

0 3,750 7,500 Feet

FIGURE 4.0-1

Cumulative Projects

Cal Poly Pomona Campus Master Plan EIR

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Table 4.0-1. Pending or Approved Reasonably Foreseeable Projects

Map ID	Project Location	Project Name	Project Description	Status/Timing
Los Angeles County				
1	NW corner of S. Campus Dr. and E. Campus Dr. adjacent to Cal Poly Pomona campus	California Highway Patrol Baldwin Park Area Office Replacement Project	The CHP Baldwin Park Area Office Replacement Project will relocate the existing Baldwin Park Area Office to provide adequate workspace, equipment storage, and vehicle parking for approximately 138 current employees, increasing to 147 employees over 10 years. The Proposed Project would develop approximately 5 acres (approximately 215,570 square feet) within the 6-acre site.	Notice of Determination filed on March 13, 2020. Construction start anticipated December of 2025.
2	Interstate 10 (I-10) from the current ExpressLanes end point at I-605 to the Los Angeles/San Bernardino County line	Metro I-10 ExpressLanes Extension Project	Caltrans and Metro are evaluating alternatives to convert existing high-occupancy vehicle (HOV) lanes to dynamically priced, high-occupancy toll (HOT) lanes, also called ExpressLanes, or add a second HOV lane in both directions.	Draft EIR/EIS anticipated for public release mid-late 2025.
3	20100 Block of Colima Road and 19816 Walnut Drive, Rowland Heights	Royal Vista Residential	The Royal Vista Residential project would redevelop six parcels of a closed golf course into four residential areas and two open space planning areas (28 acres). Of the 360 residential units, the project would consist of 200 detached single-family homes, 88 attached residential condominium units, and 72 townhomes.	Notice of Determination filed on October 1, 2024.
4	2027 Vallecito Drive and 2342 Via Cielo, Hacienda Heights	Barrera Hacienda Heights Residential	The project would create 10 residential lots on 12.35 gross acres. The project includes a CUP for the development of eight new building pads within a non-urban hillside management area and to allow over-height retaining walls within required yards, and an Oak Tree Permit to allow the encroachment into the protected zone of nine non-heritage oak trees.	Approved by Regional Planning Commission on October 9, 2024.
5	18002 Colima Road, East San Gabriel Valley Planning Area	Colima Villas	Development of a 17-unit attached townhome condominium project, including two affordable units at the moderate-income level pursuant to Chapter 21.38 of the Los Angeles County Code.	Notice of Determination filed on April 3, 2024.

Table 4.0-1. Pending or Approved Reasonably Foreseeable Projects

Map ID	Project Location	Project Name	Project Description	Status/Timing
6	15405 La Subida Drive, Hacienda Heights	La Subida Residential	Construction of a condominium development with 52 detached residential units. On-site amenities include park and open space areas of 1.09 acres.	Notice of Determination filed on January 29, 2024.
City of Pomona				
7	2889 W. Mission Boulevard	Elephant Hill	Development of the Elephant Hill project would be focused within the 43.77-acre southwestern portion of the site that is designated as Urban Neighborhood. The proposed Development Area would include development of 228 residential dwelling units, a recreational center, developed open space (including landscaped slopes and fuel modification areas), on-site roads, and utility infrastructure.	Currently in progress, not yet approved.
8	3101 W. Temple Avenue	Double Tree Hotel Expansion	The project entails construction of a six-story, 59,569-square-foot expansion of the existing Double Tree Hotel. The expansion would be located on the southeast corner of the property and will include 90 guest rooms, an elevator lobby, basement with subterranean parking, and fitness center. The project would increase the total hotel capacity on the project site to approximately 220 guest rooms and 304 parking spaces.	Approved by Planning Commission on January 12, 2022.
9	1561 Via Estrella	1561 Via Estrella Subdivision	The proposed project is the hillside development of a vacant 2.69-acre site with two single-family structures and associated improvements, including up to 16-foot retaining walls, utilities, and new drive entries. Each residence will be two-stories in height with a lower floor garage, kitchen and living space. There will be a rear yard to the rear of the second floor. The project is located within the Attached Residential District of the Mountain Meadows Specific Plan area, with a General Plan designation of Residential Neighborhood. The revised project would result in a subdivision of the existing lot into two lots.	Notice of Determination filed January 13, 2022.

Table 4.0-1. Pending or Approved Reasonably Foreseeable Projects

Map ID	Project Location	Project Name	Project Description	Status/Timing
10	2769 N. Garey Avenue	N. Garey Avenue Townhomes	Development of a 3.1-acre site with 73 three-story townhomes with attached garages (23.5 dwelling units per acre) and associated on-site improvements.	Notice of Determination filed September 2, 2021.
11	210 E. Kingsley Avenue	Kingsley Avenue Mills Act	A request for a Mills Act application (MILLS 16182-2021) for a restoration, rehabilitation, and preservation plan, which includes a schedule of projects to be completed during the first 10 years following execution of a Mills Act Contract, for the property located in the Lincoln Park Historic District.	Notice of Exemption filed September 2, 2021.
12	305 Garfield Avenue	Garfield Avenue Mills Act	A request for a Mills Act application (MILLS 13837-2020) for a restoration, rehabilitation, and preservation plan, which includes a schedule of projects to be completed during the first 10 years following execution of a Mills Act Contract, for the property located in the Lincoln Park Historic District.	Notice of Exemption filed September 2, 2021.
13	McKinley Avenue and Fairplex Drive	Fairplex Specific Plan	Specific Plan of the nearly 500-acre property in the City of Pomona that focuses on the re-purposing of over 300 acres of surface parking lots, transforming the parking areas into up to 10,500 units of housing and 1.5 million square feet of commercial development.	2022-Ongoing.
City of Walnut				
14	800 Meadow Pass Road	Brookside Residential	Development of a 28-unit single-family detached housing project. A total of 11.4 acres of open space with recorded deed restrictions would preserve and maintain natural open space and Lemon Creek. Of the 11.4 acres, 9.5 acres of the open space will be owned by individual lot owners, but deed restricted to public trail and passive open space purposes.	Currently in progress, not yet approved.
15	Mt. San Antonio College 1100 N. Grand Avenue Walnut, CA, 91789	Measure V and Measure Go projects	Current projects include: **Instructional Offices and Welcome Center.** The project will provide much needed additional administrative offices and will directly connect to the the Student Center and “Miracle Mile” pathway by way of an elevated	Estimated construction completion is 2027.

Table 4.0-1. Pending or Approved Reasonably Foreseeable Projects

Map ID	Project Location	Project Name	Project Description	Status/Timing
			pedestrian bridge. The building will also be home to a Welcome Center.	
			Continuing Education Classrooms. The Continuing Education Classrooms project will improve delivery of Career and Technical Education programs, including health professions.	Construction schedule is to be determined.
			Technology and Health Building. The new 253,866-gross-square-foot Technology and Health facility will consolidate programs from six locations. The new four-level structure will be located on the site of the existing pool and supporting athletics facilities, just south of the Business and Computer Technology Complex. The facility will include specialized laboratory space, general classrooms, offices, study rooms, and academic support space.	Estimated construction completion is 2027.

Source: City of Pomona 2024; City of Walnut 2024; Los Angeles County, Department of Regional Planning 2024; Metro 2025; Mount San Antonio Community College 2025.

4.0.7 References

City of Pomona. 2024. Environmental Documents. December 11, 2024. https://www.pomonaca.gov/government/departments/development-services/planning-division/environmental-documents.

City of Walnut. 2024. Developments. December 11, 2024. https://www.cityofwalnut.org/for-residents/departments/community-development/developments.

Los Angeles County, Department of Regional Planning. 2024. Environmental Review. December 11, 2024. https://planning.lacounty.gov/environmental-review/public-notice/.

Metro. 2025. I-10 ExpressLanes Extension Project. April 22, 2025. https://www.metro.net/projects/i-10-extension/.

Mount San Antonio Community College. 2025. List of current Measure V and Measure GO projects. April 22, 2025. https://www.mtsac.edu/construction/.

4.1 Aesthetics

The following analysis identifies potential impacts to aesthetics resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing aesthetic conditions in the proposed Master Plan area, discusses the regulatory setting, evaluates potential impacts, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts.

No comments related to aesthetics were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are provided in Appendix A.

4.1.1 Environmental Setting

4.1.1.1 Visual Character

Cal Poly Pomona

Cal Poly Pomona is one of the largest California State University campuses and is characterized by areas of relatively level terrain developed with academic, residential, recreational and student support services, steep slopes with orchards, horse pastures, and other undeveloped open spaces. The main campus topography ranges from lowland in the southeast to rolling hills rising almost 175 feet to the ridgeline along the northwestern edge. Natural vegetation includes California sagebrush (*Artemesia californica*) scrubland and grassland, with stands of California black walnut (*Juglans californica*) and live oak (*Quercus agrifolia*) trees on the hillsides. The northern and western edges are defined by the surrounding topography. From an elevation of roughly 1,000 feet above sea level north of University Drive, the site drops several hundred feet to the agricultural fields south of Kellogg Drive. The complex topography and steep slopes have limited development in the hills, which are primarily used for grazing or protected as part of the Voorhis Ecological Reserve. Several environmentally sensitive areas protect native flora and fauna, including the black walnut and the California gnatcatcher (*Polioptila californica californica*).

Cal Poly Pomona is located on the edge of the San Jose Hills, near Frank G. Bonelli Regional Park and the Puddingstone Reservoir. Established in the 1950s, the campus was originally part of an 813-acre gift from cereal magnate W.K. Kellogg in 1949. The W.K. Kellogg property included orchards and an Arabian horse ranch, which is still maintained by the University as the W.K. Kellogg Arabian Horse Center. The campus is surrounded by residential areas, light manufacturing, and commercial establishments. To the northwest, single-family homes in the City of Walnut border the campus, while the adjacent Forest Lawn Cemetery overlooks it from the north. South of campus, residential areas along Valley Boulevard buffer the University from light industrial and commercial facilities along the Union Pacific railway tracks. Cal Poly Pomona's Lanterman Development Center is located southwest of the main campus, next to University-owned Spadra Farm. A nearby institutional neighbor includes Mount San Antonio Community College. The campus is well connected to the LA Metropolitan Region by major highways and transportation systems. Interstate 10 Freeway (I-10) provides an east-west connection to Los Angeles, while the Orange Freeway (State Route 57) is a north-south connector. West Temple Boulevard and Valley Boulevard are key local roads connecting the campus to the surrounding community.

The Cal Poly Pomona main campus features formal landscaping, quadrangles, plazas, and gardens. The University Quad and the Engineering Meadow are the largest open spaces in the campus core. The Rose Garden and Japanese Garden are smaller, more intimate spaces. Plaza spaces by the Library Addition and Building 7 provide important

gathering places for students. These open spaces are connected by pedestrian ways, each with its own distinct landscape character. Landscaped edges along roads and pathways contribute to the campus character.

Outside the campus core, open spaces vary from academic agricultural land for crop production and animal husbandry to native vegetation along steep hillsides. Similarly, the sycamore (*Platanus sp.*) trees lining Kellogg Drive and the horse pasture adjacent to the W.K. Kellogg Arabian Horse Center are defining elements of campus identity.

The main campus hosts a variety of academic, student life, recreational, residential, and support facilities. These facilities vary in age, condition, architectural style, and use but collectively define the Cal Poly Pomona main campus. The campus core is urban in character, with buildings typically being simple volumes of modest scale, framing public spaces and enhancing the pedestrian experience.

Surrounding Area

With approximately 4,083 square miles, Los Angeles County is geographically one of the largest counties in the country. Los Angeles County stretches along 75 miles of the Pacific Coast of Southern California and is bordered to the east by Orange County and San Bernardino County, to the north by Kern County, and to the west by Ventura County. Los Angeles County also includes two offshore islands, Santa Catalina Island and San Clemente Island (Los Angeles County 2024).

The Cities of Pomona and Walnut are located primarily in the easternmost part of the County, situated in between the Angeles National Forest to the north, San Bernardino National Forest to the east and the San Gabriel Valley to the south and west. The Angeles National Forest and San Bernardino National Forests are vast, rugged expanses, featuring a diverse array of landscapes, including dense chaparral, sagebrush scrub, and riparian woodlands. The Angeles National Forest encompasses the San Gabriel Mountains and Sierra Pelona Mountains. The main visitor areas, such as the Chilao Visitor Center and Mount Baldy, are situated within these varied terrains, where the dense vegetation often obscures distant views of the Los Angeles Basin. Some parts of the forest extend into higher elevations, where the landscape transitions into coniferous forests and alpine tundra. This includes the San Gabriel Wilderness, which spans thousands of acres from west to east, ranging in elevation from approximately 1,500 feet above mean sea level (AMSL) in the lower canyons to over 10,000 feet AMSL at the summit of Mount San Antonio (Mount Baldy). The wilderness areas are noted for their steep geography, dramatic rock formations, and dense tree cover. The San Bernardino National Forest encompasses the San Bernardino Mountains and parts of the San Jacinto and Santa Rosa Mountains. The main visitor areas, such as the Big Bear Lake and Lake Arrowhead, are situated within these varied terrains, where the dense vegetation often obscures distant views of the Inland Empire. Some parts of the forest extend into higher elevations, where the landscape transitions into coniferous forests and alpine tundra. This includes the San Gorgonio Wilderness, which spans thousands of acres from west to east, ranging in elevation from approximately 2,000 feet AMSL in the lower canyons to over 11,000 feet AMSL at the summit of San Gorgonio Mountain. The wilderness areas are noted for their steep geography, dramatic rock formations, and dense tree cover.

Pomona’s downtown is characterized by a mix of historic and contemporary architecture, with notable landmarks such as the Fox Theater Pomona, an Art Deco gem, and the Lincoln Park Historic District, which showcases a diverse range of architectural styles from the late Victorian to Craftsman eras. The downtown area features galleries, street art, and cultural institutions like the Latino Art Museum. Pomona's landscape includes numerous parks and green spaces, such as Ganesha Park and the Fairplex, home to the Los Angeles County Fair. These areas provide a contrast to the urban environment, offering lush greenery and recreational opportunities. The

City of Pomona is also home to the Pomona Valley, where agricultural lands and orchards add more contrast to the otherwise urban setting.

The City of Walnut, west of Pomona, is characterized by a more suburban setting. The visual character of Walnut is defined by its well-maintained residential neighborhoods, rolling hills, and expansive open spaces. Walnut's landscape includes numerous parks and trails, such as Suzanne Park and Walnut Ranch Park. The City of Walnut also features the scenic Snow Creek Park, where visitors can enjoy views of the surrounding hills and valleys.

4.1.1.2 Scenic Views and Vistas

While there are no designated scenic vistas listed in the 2000 Cal Poly Pomona Master Plan, "view corridors" are described as external and internal opportunities for the surrounding community to view the campus and vice versa. Several view corridors are listed in the 2000 Cal Poly Pomona Master Plan. This list includes the Classroom/ Lab/Administration (CLA) Building (Buildings 98B/C/P) as the most prominent campus landmark, as it is visible from both on and off campus. However, since then, the most visually prominent portion of the CLA Building has been demolished (i.e., CLA Tower and Registration buildings). Other notable view corridors include Ag Valley from Temple Avenue and University Drive. Additional visual landmarks are the Library (Building 15), College of Business Administration (Buildings 162, 163, and 164), College of Agriculture (Building 2), Kellogg House (Building 113), Rose Garden, the densely vegetated hills north of the campus, and the Pavilion. Some of these "view corridors" are analyzed later in this section for their potential to be impacted by the proposed Master Plan. The potential presence of scenic views and vistas in the surrounding area is described below.

County of Los Angeles

Los Angeles County recognizes scenic features in the region, such as the coastline and mountain vistas. One type of scenic resource is the Hillside Management Areas (HMAs), which are mountainous or foothill terrain with a natural slope of 25% or greater. The purpose of the Hillside Management Ordinance in Title 22 of the County Code is to regulate development within HMAs to (1) protect the public from natural hazards associated with steep hillsides, and (2) to minimize the effects of development and grading on the scenic resources. In addition to HMAs, the General Plan protects ridgelines, scenic viewsheds, and areas along scenic highways.

The San Gabriel Mountains, Verdugo Hills, Santa Susana Mountains, Simi Hills, Santa Monica Mountains, and Puente Hills play a major role in physically defining the diverse communities in the unincorporated areas. The vast majority of the native plant and animal species reside within the hilly and mountainous terrain. Mountain lions, bobcats, black bears, and deer inhabit these areas. A high number of heritage oak trees that are 100 to 600 years old occur in many of the oak woodlands in the unincorporated areas. While these listed features are important in the visual setting of the unincorporated area of Los Angeles County, there are no designated scenic vistas in proximity to the proposed Master Plan area, based on review of the Los Angeles County 2035 General Plan (Los Angeles County 2024). Although the County of Los Angeles Schabarum-Skyline Trail is located one mile west of the Cal Poly Pomona campus, the Cal Poly Pomona campus is not visible from the trail, because the San Jose Hills are blocking any potential views of the campus.

Cities of Pomona and Walnut

Both the cities of Pomona and Walnut list the hillsides and open space areas as having scenic quality that is of value to the community; however, there are no designated scenic vistas, based on review of the general plans for these cities (City of Pomona 2014; City of Walnut 2018).

4.1.1.3 Scenic Roads

A scenic road is a highway, road, drive, or street that provides opportunities for the enjoyment of natural and human-made scenic resources. According to the Caltrans Scenic Highway Program, there are no state-designated or eligible scenic routes located on the campus or within the cities of Pomona and Walnut. The closest eligible scenic highway is State Route (SR-) 57, located over 3 miles south in the City of Diamond Bar (Caltrans 2024). Views of the proposed Master Plan area are not available from SR-57. Additionally, the City of Pomona, City of Walnut and County of Los Angeles do not have any designated local scenic routes, based on review of the general plans for these agencies (City of Pomona 2014; City of Walnut 2018; Los Angeles County 2024).

4.1.1.4 Key Viewpoints

From off-site locations, hillsides and landscaping screen much of the main campus from view. The flat landscaping limits views of these properties to immediately adjacent streets and roadways. Viewers would be limited to motorists, and bicyclists on perimeter roadways and residents of surrounding areas. Most of the views from these residents and from other residential homes are obscured by large mature trees, established landscaping, or topography. While the campus may be visible from higher-elevation points in the foothills or mountain region, views of the proposed Master Plan area are not particularly distinct amid other surrounding developments.

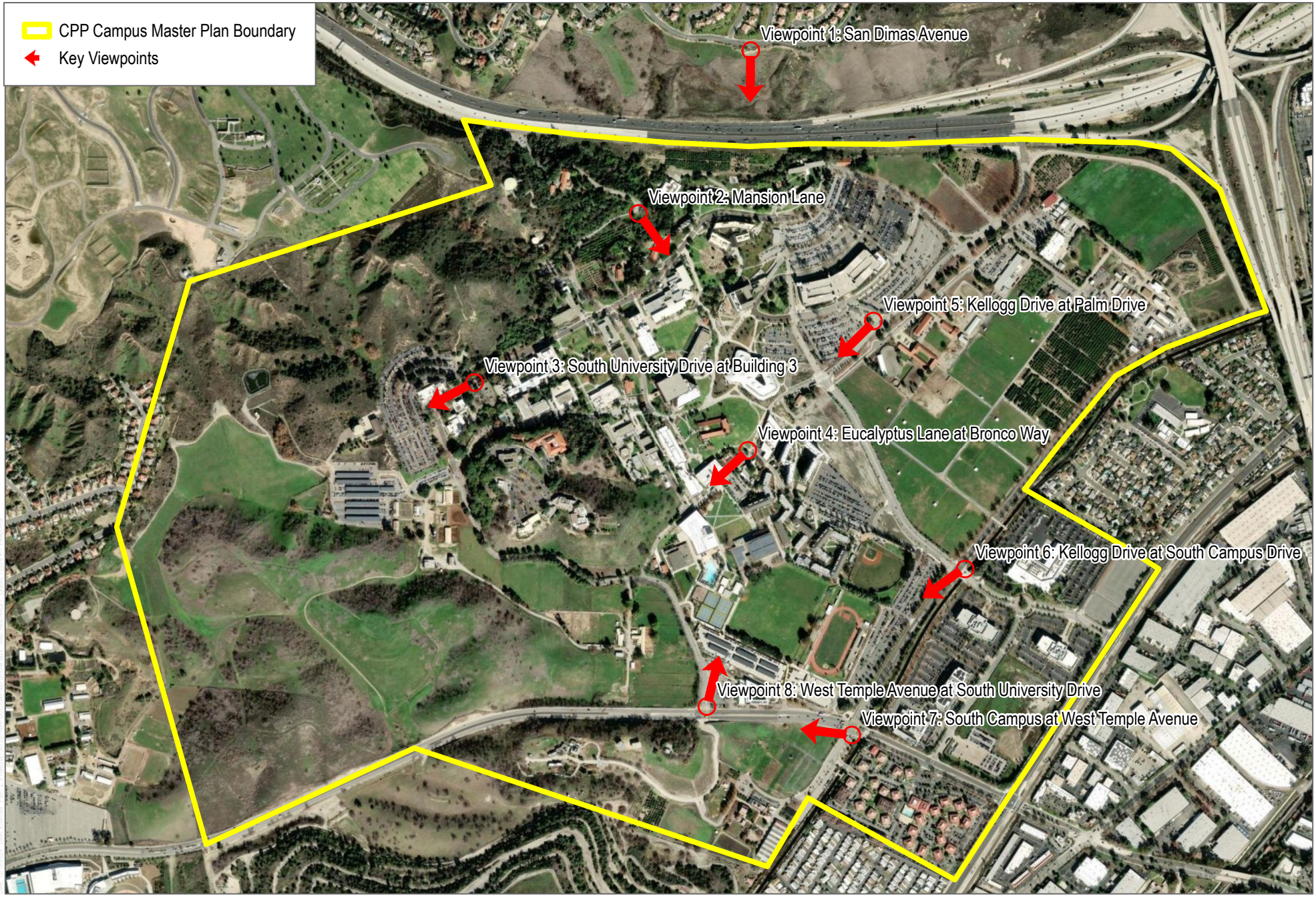
Key viewpoints for the proposed Master Plan area are shown in Figure 4.1-1 and Figure 4.1-2. These viewpoints have been selected based on visibility from public areas, previously identified “view corridors” (see Section 4.1.1.2, Scenic Views and Vistas), and views that could be potentially affected by implementation of the proposed Master Plan. Given that none of the views from these locations are designated scenic vistas or are otherwise considered scenic vistas, the purpose of identifying key viewpoints from public areas is to support the evaluation in Section 4.1.4.2, Project Impacts, regarding whether the proposed Master Plan would conflict with regulations governing scenic quality or would otherwise impact scenic quality. As the “view corridors” previously described are primarily on campus, most of the key viewpoints are also on campus. The key viewpoints are briefly described below.

Viewpoint 1: San Dimas Avenue

Viewpoint 1, looking south from a residential street offers broad views of the Cal Poly Pomona campus. Buildings 21, 22, and 23 (Reds Traditional Residence Halls) are visible. The hillside in the forefront is covered in tall dry grass and a few low green shrubs. Among hills to the south, east, and west, the valley is clearly developed; however, the campus is easily distinct, with tall lightly colored buildings and abundant mature trees interspersed throughout. The I-10 and the Reds Traditional Residence Halls are visible at the bottom of the hill where the key viewpoint is located, and the unique shape of the Pavilion stands out slightly among the rectangular buildings. Various species of mature trees, and agricultural fields dominate the easterly side of the campus.

Viewpoint 2: Mansion Lane

Viewpoint 2, looking south/southeast from a section of Mansion Lane, which connects the campus to the historic Kellogg House (Building 113) in the northwestern corner of campus, atop a hill bordering Interstate 10. Viewpoint 2 offers superior views of the Art Department/Engineering Annex (Building 13) and much of the on-campus transportation. The forefront view is dominated by various mature trees, including sycamore (Platanus sp.) and Pepper (Schinus molle) trees. A pocket of the campus is visible through the clearing in the trees, which includes the top stories of the College of Engineering (Building 9), a large white building, as well as the irregularly shaped white Pavilion, and the University Library (Building 15), which is a large rectangular, brown-colored building.



SOURCE: World Imagery

DUDEK

0 500 1,000 Feet

FIGURE 4.1-1

Key Campus Viewpoints

Cal Poly Pomona Campus Master Plan EIR

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Viewpoint 1: San Dimas Avenue looking South



Viewpoint 2: Mansion Lane looking Southeast

FIGURE 4.1-2

Photographs from Key Viewpoints

Cal Poly Pomona Campus Master Plan EIR

DUDEK



Viewpoint 3: South University Drive at Building 3 looking Southwest



Viewpoint 4: Eucalyptus Lane at Bronco Way looking Southwest

FIGURE 4.1-2

Photographs from Key Viewpoints

Cal Poly Pomona Campus Master Plan EIR

DUDEK



Viewpoint 5: Kellogg Drive at Palm Drive looking Southwest



Viewpoint 6: Kellogg Drive at South Campus Drive looking Southwest

FIGURE 4.1-2

Photographs from Key Viewpoints

Cal Poly Pomona Campus Master Plan EIR

DUDEK



Viewpoint 7: South Campus Drive at West Temple Avenue looking West



Viewpoint 8: West Temple Avenue at South University Drive looking North

FIGURE 4.1-2

Photographs from Key Viewpoints

Cal Poly Pomona Campus Master Plan EIR

DUDEK

Viewpoint 3: South University Drive at Building 3

Viewpoint 3 looks west/southwest adjacent to the Science Laboratory (Building 3), from South University Drive. Various Trees, including Pepper, sycamore, and Pine (*Pinus sp.*) trees line each side of the street. A wide sidewalk lines the southern side of the road, running parallel with the road. At the end of the street, before it veers south, the existing Student Health Service Building (Building 46) and its parking lot are visible.

Viewpoint 4: Eucalyptus Lane at Bronco Way

Viewpoint 4, looking west/southwest down Eucalyptus Drive from Bronco Way offers views of Building 66, the Bronco Bookstore on the western side of the road; and Building 116, the existing Child Care Center on the eastern side of the road. Characteristic with the rest of campus, the areas lining the road are landscaped with several various mature trees and low grasses, interspersed throughout the view. A sidewalk is on the easterly side of the road.

Viewpoint 5: Kellogg Drive at Palm Drive

Viewpoint 5 looks west/southwest from Kellogg Drive entering campus and is adjacent to a large parking lot. Uniformly landscaped mature trees and low shrubs dominate the foreground and middle-ground, on either side of the prominent road. Secoya Residence Hall (Building 74), a tall rectangular building, mostly light grey with a touch of dark brown and a low parking lot are visible southeast of Kellogg Drive.

Viewpoint 6: Kellogg Drive at South Campus Drive

Viewpoint 6, looking west/southwest from the intersection of two main campus streets offers views of the current Track and Field Stadium, through tall mature trees that uniformly line the sides of the road and views of a baseball field, specifically field lighting is slightly visible between the foliage on the western side. Through the trees on the eastern side, a parking lot is visible. Large mature trees dominate the middle-ground view.

Viewpoint 7: South Campus Drive at West Temple Avenue

Viewpoint 7, looking southwest offers an expansive view of southbound South Campus Drive in the foreground and an agricultural field behind a short white fence that dominates the middle-ground. The Farm Store is visible in front of rolling hills and open space in the background.

Viewpoint 8: West Temple Avenue at South University Drive

Viewpoint 8, looking north/northeast from South University Drive near its intersection with West Temple Avenue. Views here include the southwest entrance to the campus, I-Poly High School (Building 85), and a large parking lot. In the background, rugged mountains peak over the buildings, and tall palm trees and stadium lights appear from behind the top of I-Poly High School. Numerous landscaped trees of varying heights and shapes are interspersed throughout the whole view.

4.1.1.5 Light and Glare

Nighttime lighting is necessary to provide and maintain a safe and secure campus environment. Light that falls beyond the intended area of illumination is referred to as “light trespass.” Types of light trespass include spillover light and glare. Spillover light, which is light that illuminates surfaces beyond the intended area, is typically caused by artificial lighting sources, such as from building security lighting, signs, parking lot lights, roadway lights, and stadium lights on playing fields. Spillover light can adversely affect light-sensitive uses (i.e., adjacent residences),

by creating unwanted illumination. Because light dissipates as it moves farther from its source, the intensity of the lighting source is often increased to compensate for dissipating light, which can increase the amount of light that illuminates adjacent uses. The type of light fixture determines the extent to which light will spill over onto adjacent properties and/or be visible from far away. Modern, energy-efficient fixtures that face downward, such as cutoff-type fixtures and shielded light fixtures, are less obtrusive than older light fixtures.

Direct glare is caused by excessive light entering the eye from a bright light source. The potential for direct glare exists any time one can "see" a light source. Glare can result from sunlight or from artificial light reflecting off building exteriors, such as glass windows, metal roofs or other highly reflective surface materials. Glare can also result from a lighting system that aims more light outwards and increases the potential for glare. Squinting or turning away from a light source is an indication of glare. Cutoff-type light fixtures minimize glare because they emit relatively low-intensity light at these angles. Glare resulting from sunlight reflecting off building exteriors can be reduced with design features that use low-reflective glass and exterior materials and colors that absorb, rather than reflect, light.

Sources of nighttime illumination and potential glare on and adjacent to the main campus are generally limited to the interior and exterior lights of buildings; lighting visible through windows; parking lot and path lighting; and lighting along campus streets. When in use, night lighting is also present in the sports fields located in the southern portion of the main campus. Areas surrounding the main campus are also sources of nighttime illumination, including from motorists along adjacent roadways (including the I-10), from street and highway lighting, and from residential uses to the north, south, and west, and from commercial uses to the west. These sources of illumination are typical of those in a developed urbanized area, like the proposed Master Plan area.

In addition, cars and trucks traveling to, from, and within the area (especially on the I-10), as well as parked cars, represent another source of glare. Natural and artificial light reflects off various surfaces and can create localized occurrences of daytime and nighttime glare. Buildings and structures made with glass, metal, and polished exterior roofing materials exist throughout the main campus.

4.1.2 Regulatory Setting

4.1.2.1 Federal

There are no federal regulations regarding aesthetics applicable to the proposed Master Plan.

4.1.2.2 State

State Scenic Highway Program

The California Department of Transportation (Caltrans) manages the State Scenic Highway Program detailed in Streets and Highways Code Section 260. A highway may be designated as scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. To become an officially designated scenic highway, a local jurisdiction must adopt a scenic corridor protection program for the eligible state scenic highway, apply to Caltrans for scenic highway approval, and receive notification from Caltrans that the highway has been designated as a scenic highway. The scenic corridor protection program is made up of adopted ordinances to preserve the scenic quality of the corridor or document such regulations that already exist in various portions of local codes. State and county roads can be designated as scenic highways. There are no highways or roads within the proposed Master Plan area or surrounding area eligible for inclusion in the State Scenic Highway Program (Caltrans 2024).

Nighttime Sky – Title 24 Outdoor Lighting Standards

The California legislature passed a bill in 2001 requiring the California Energy Commission to adopt energy efficiency standards for outdoor lighting for both the public and private sector. The most recent 2022 update to the Building Energy Efficiency Standards (Energy Code) includes outdoor lighting standards for new development to help to reduce the impacts of light pollution, light trespass, and glare. The standards regulate lighting characteristics such as maximum power and brightness, shielding, and sensor controls to turn lighting on and off (CEC 2022).

CSU Campus Design Review Process

The CSU System uses a design review process at all its campuses as part of the schematic design preparation process (CSU 2004). This process involves an outside Master Plan architect appointed by the president of each campus. The architect reviews the design of construction projects for appropriateness of design and quality based on the design vocabulary of the particular campus. For Cal Poly Pomona, its design vocabulary is currently established in the design guidelines provided in the 2000 Cal Poly Pomona Master Plan. The outside architectural review is then interpreted by the campus building official. , The ultimate responsibility for schematic design approval rests with the CSU Board of Trustees with authority delegated to the Chancellor's Office of Capital Planning, Design and Construction, depending upon the size and/or visual impact of a project (CSU 2004).

CSU Outdoor Lighting Design Guide

Lighting of the proposed Master Plan area would align with the guidelines in CSU Outdoor Lighting Design Guide (CSU 2018). This guide provides the CSU campuses with guidance for outdoor lighting design in order to provide a comfortable nighttime environment, maximize energy efficiency, and improve campus aesthetics. The guide contains CSU lighting design goals and strategies, lighting control strategies and methods throughout the campuses, and preferred lamp types identified for energy efficiency and ease of maintenance. The guide includes goals pertaining to compliance with local codes, assurance of good nighttime visibility, low maintenance of lighting, energy efficiency, reduced light pollution, and integration into the overall campus aesthetic. Sports field lighting is not specifically addressed in this document. Lighting design strategies are provided in the guide to aid in implementation of established lighting goals. Lighting design strategies are orientated toward creating vertical surface brightness, enhancing navigation, minimizing glare, maintaining lighting uniformity, and provide appropriate lighting levels.

CSU Executive Order 0987

This policy statement is issued under the CSU Executive Order 0987 and sets minimum efficiency standards for CSU buildings and establishes sustainable operating practices. While these standards pertain to energy efficiency, the following policies under Physical Plant Management are applicable to indoor and outdoor lighting usage:

3. Physical Plant Management

> 10. All lighting, except what is required for security purposes, will be turned off when buildings and facilities are unoccupied, such as at the end of the workday. Custodial personnel will turn lights back on only for the time actually required for custodial work.
>
> 11. …[L]ighting systems will not be operated any more or longer than what is required under health and safety codes during low load custodial occupancy periods.
>
> 12. Indoor lighting will be reduced in number and/or wattage, wherever possible, to provide for the minimum but adequate lighting levels consistent with the needs of instructional

programs and state-mandated standards for the efficient and effective use of the space. Existing incandescent lamps for general-purpose lighting will be phased out and future incandescent lamps will not be allowed unless exempted for very limited and specialized tasks by the campus energy/utility managers. New lighting systems will be in the form of the latest energy saving technology.

13. Outside lighting on building exteriors and campus grounds will be maintained at levels necessary to provide security and safety to promote confidence within the campus community.

14. Purely decorative lighting on CSU campuses beyond reasonable display lighting, inside or outside, will not be added. Existing decorative lighting beyond reasonable display lighting will be eliminated on a continuing basis. In general, lighting will not be used for commercial or holiday purposes unless specifically exempted by the campus president.

4.1.2.3 Local

As a state entity, Cal Poly Pomona is not subject to local government permitting or regulations, policies, or ordinances, such as the general plans and ordinances for the City of Pomona, City of Walnut, or the County of Los Angeles. Because Cal Poly Pomona is not subject to local general plans or other local land use plans and/or ordinances, these regulations are not summarized here or further analyzed in this section. However, as described in Section 4.1.1, Environmental Setting, the local general plans were reviewed as they provide some description of scenic views/vistas and scenic roads in the surrounding areas.

4.1.3 Thresholds of Significance and Methodology

4.1.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, the California Environmental Quality Act (CEQA) Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section15064.7). The significance criteria used to evaluate the proposed Master Plan's impacts to aesthetics are based on CEQA Guidelines Appendix G. A potentially significant impact to aesthetics would occur if the proposed Master Plan would:

1. Have a substantial adverse effect on a scenic vista.
2. Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
3. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Regarding the third standard above (discussed in Impact 4.1-1 below), the proposed Master Plan area is within an urbanized area based on the definitions provided in Public Resources Code Section 21071. Public Resources Code Section 21071 indicates that an "urbanized area" means (among several definitions) an incorporated city with at least 100,000 persons. The proposed Master Plan area is contiguous to the Cities of Pomona and Walnut. As of July 1, 2023, the population of Pomona was 145,502 persons, and the population of Walnut was 27,104 persons (United States Census Bureau 2023). Therefore, pursuant to California Public Resources Code Section 21071, Cal Poly Pomona is in an urbanized area and as such, impacts to visual character are assessed through consideration of potential conflicts with applicable regulations governing scenic quality.

4.1.3.2 Methodology

This section considers the existing visual conditions on the main campus, using key viewpoints (described in Section 4.1.1.4, Key Viewpoints) and considers the degree of visual change associated with the proposed Master Plan.

4.1.4 Impact Analysis

4.1.4.1 Issues Not Further Evaluated

The proposed Master Plan would have no impact with respect to the following thresholds of significance and therefore these topics are not further evaluated:

- **Substantial Adverse Effect on a Scenic Vista.** As described in Section 4.1.1, Environmental Setting, no designated scenic vistas are identified in relevant planning documents, including the City of Pomona 2014 General Plan, City of Walnut General Plan, or Los Angeles County 2035 General Plan, or by Cal Poly Pomona. Additionally, there are no designated scenic vistas within the Cal Poly Pomona main campus. Therefore, the proposed Master Plan would have **no impact** on scenic vistas**.**
- **Substantial Damage to Scenic Resources.** The proposed Master Plan is not located within the viewshed of a state scenic highway, as described in Section 4.1.1. Additionally, scenic roads and resources were not identified within relevant planning documents, including the City of Pomona 2014 General Plan, City of Walnut General Plan, or Los Angeles County 2035 General Plan. Due to the location of the Cal Poly Pomona main campus outside the viewshed of a state scenic highway or locally designated scenic road, the proposed Master Plan would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. Therefore, the proposed Master Plan would have **no impact** on scenic resources**.**

4.1.4.2 Project Impacts

Impact 4.1-1 In an urbanized area, the project would not conflict with applicable zoning and other regulations governing scenic quality. (Less Than Significant)

As described in Section 4.1.3.1, Thresholds of Significance, Cal Poly Pomona is in an urbanized area, as defined in California Public Resources Code Section 21071, and as such, impacts to visual character are assessed through consideration of potential conflicts with applicable regulations governing scenic quality. However, because the CSU is not subject to local zoning or other local land use regulations, the discussion below evaluates whether the proposed Master Plan would conflict with applicable state and CSU regulations and policies governing scenic quality or would otherwise have a potential impact on scenic quality.

Program-Level Analysis for Master Plan

Construction

Construction-related activities would be visible by the public from public vantage points including adjacent roadways, including I-10, South Campus Drive, and Temple Avenue; and from non-motorist vantage points, including pedestrians along Temple Avenue. These construction activities would result in a temporary visual change by removing or altering existing visual elements that contribute to the visual environment. Examples of visual changes include grading and demolished structures, and the presence of construction equipment, materials (including piles of soil), signs, and staging areas.

Several proposed demolitions would be temporarily visible from key viewpoints (see Figure 4.1-1 and Figure 4.1-2). Viewpoint 2, which is located on Mansion Lane and connects the campus to the historic Kellogg House (Building 113), would offer views of the demolition of the Art Department/Engineering Annex (Building 13). Viewpoint 3, which looks west/southwest adjacent to the College of Agriculture (Building 2), from South University Drive would show the demolition of the Student Health Service Building (Building 46). Viewpoint 4, looking west/southwest down Eucalyptus Drive from Bronco Way would offer views of the proposed demolition of Building 66, the Bronco Bookstore on the western side of the road; and the demolition of the existing Child Care Center (Building 116) on the eastern side of the road.

While proposed Master Plan construction activities would be visible, these activities and changes are temporary and short-term in nature and would not be present following completion of construction. Additionally, there are no state or CSU regulations governing scenic quality that apply to construction activities. As such, construction of the proposed Master Plan components would not conflict with regulations governing scenic quality and impacts would be **less than significant**.

Operation

Overall, the proposed Master Plan would include approximately 600,000 GSF of net new building space for academic, student support services, and athletic and recreation facilities. Over the course of the anticipated buildout of the proposed Master Plan through year 2040, existing campus buildings would be renovated, new buildings would be constructed, and existing campus buildings would be demolished. Mobility and circulation, and utility improvements would also occur. Proposed development would consist of infill development on existing developed or paved sites within the campus core and elsewhere on the main campus. Limited development would occur near the edges of the main campus. Relevant key viewpoints (shown in Figure 4.1-1 and Figure 4.1-2) are analyzed for potential impacts of proposed development.

Upon buildout of the proposed Master Plan, the following components would be visible from Key Viewpoint 1, San Dimas Avenue: the ROTC Relocation and Site Reuse (Buildings 13B-D) and Campus Loop. The ROTC Relocation and Site Reuse involves renovation of an existing facility, and thus would be similar in scale, massing, height, and character to existing building. The Campus Loop Construction project involves improvements to existing roadways and thus would be consistent with the current layout of the campus.

Key Viewpoint 2, Mansion Lane would offer views of the proposed Engineering Graduate Building (Building 14). This building would replace the Art Department/Engineering Annex (Building 13), that would be demolished with the proposed Master Plan. While the new Engineering Graduate Building (Building 14) would be somewhat larger than

the existing building, it would be similar in scale, massing, height, and character as other nearby buildings, such as the Library (Building 15).

Key Viewpoint 3, South University Drive at Building 3 and Viewpoint 5, Kellogg Drive at Palm Drive would offer views of the proposed Well Water and Water Treatment Plant Expansion (Building 27). As these are expansions of existing facilities, the new developments would be similar in scale, massing, height, and character.

Key Viewpoint 6, Kellogg Drive at South Campus Drive, Key Viewpoint 7, South Campus at West Temple Avenue and Key Viewpoint 8, West Temple Avenue at South University Drive capture intensified views of the campus from roadways to the south, which would include the following proposed Master Plan components: the renovations at I-Poly High School (Building 85), the Children's Center Replacement (Building 217), renovation of the Recreational Fields, and the Soccer and Kellogg Stadium Replacement. Renovations at I-Poly High School would be limited to a 10,000-square-foot Multi-Purpose Recreational Center addition (Building 85) to the existing High School building. The new Children's Center Replacement building (20,000 square feet) would be similar in scale to existing buildings located in the southern campus. Renovation of the Recreational Fields and the Soccer and Kellogg Stadium Replacement would not involve new lighting or an expansion of seats and would improve the appearance of the existing fields. Therefore, the renovations at I-Poly High School, construction of the Children's Center Replacement, renovation of the Recreational Fields, and the Soccer and Kellogg Stadium Replacement would be similar in scale, massing, height, and character to existing development.

Furthermore, new construction under the proposed Master Plan would be subject to the CSU schematic design review process, described in Section 3.1.2, Regulatory Setting, which involves the appointment of a Master Plan architect to review projects for appropriateness of design and quality based on the design vocabulary of a particular campus. As described above, proposed Master Plan components would be similar in scale, massing, height, and character to existing development. Additionally, the proposed Master Plan would not conflict with applicable state and CSU lighting standards and guidelines contained in Title 24 outdoor lighting standards (CEC 2022), CSU Outdoor Lighting Design Guide (CSU 2018), and CSU Executive Order 0987 related to interior and exterior lighting (see Impact 4.1-2 for additional information). As such, implementation of the proposed Master Plan would not conflict with regulations governing scenic quality and the impacts would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Construction

Construction-related activities would be visible by the public from public vantage points including adjacent roadways, including I-10, South Campus Drive, and Temple Avenue; and from non-motorist vantage points, including pedestrians along Temple Avenue. These construction activities would result in a temporary visual change by removing or altering existing visual elements that contribute to the visual environment. Examples of visual changes include grading and demolished structures, and the presence of construction equipment, materials (including piles of soil), signs, and staging areas. Key Viewpoint 2, which is located on Mansion Lane and connects the campus to the historic Kellogg House (Building 113), would offer views of the demolition of the Art Department/Engineering Annex (Building 13), which is a near-term project. While this demolition would be visible, these activities and changes are temporary and short-term in nature and would not be present following completion of construction. Additionally, there are no state or CSU regulations governing scenic quality that apply to construction activities. As such, construction of the near-term projects would not conflict with regulations governing scenic quality and impacts would be **less than significant**.

Operation

As part of implementation of the near-term projects, some existing campus buildings would be renovated, one new building would be constructed, and one existing campus building would be demolished. Near-term projects would also include utility improvements and mobility and circulation improvements. Near-term projects would generally include renovation to existing buildings within the campus core, which would result in limited impacts to scenic quality. Limited development would occur near the edges of the main campus.

As described above, Key Viewpoint 2, Mansion Lane would offer views of the proposed Engineering Graduate Building (Building 14). This near-term project would replace the Art Department/Engineering Annex (Building 13), that would be demolished with the proposed Master Plan. While the new Engineering Graduate Building would be somewhat larger than the existing building, it would be similar in scale, massing, height, and character as other nearby buildings, such as the Library Building (Building 15). Also as described above, Key Viewpoint 3, South University Drive at Building 3 and Viewpoint 5, Kellogg Drive at Palm Drive would offer views of the proposed Well Water and Water Treatment Plant Expansion (Building 27). As these are expansions of existing facilities, the new developments would be similar in scale, massing, height, and character.

Key Viewpoint 7, South Campus at West Temple Avenue and Key Viewpoint 8, West Temple Avenue at South University Drive capture intensified views of the campus from southern residential areas. The approximately 30,000 GSF Bronco Mobility Hub (Building 133) would be a central place to make transportation connections and access services and information. The proposed location is Parking Lot B-1 on South Campus Drive to minimize the impact on Foothill Transit route schedules and to connect with the campus shuttle loop. Existing Foothill Transit bus stops on Temple Avenue and South Campus Drive would move into the Hub, reducing the number of pedestrians crossings and reducing the traffic back-ups behind the buses. The Bronco Mobility Hub would improve the existing circulation and would improve the appearance of the area during high traffic conditions. While a new building would be introduced to an area that is currently occupied by a parking lot, it would be similar in scale, massing, height, and character to existing development located across South Campus Drive (Innovation Village).

Furthermore, new near-term project construction would be subject to the CSU schematic design review process, described in Section 3.1.2, Regulatory Setting, which involves the appointment of a Master Plan architect to review projects for appropriateness of design and quality based on the design vocabulary of a particular campus. As described above, proposed near-term projects would be similar in scale, massing, height, and character to existing development. Additionally, near-term projects would not conflict with applicable state and CSU lighting standards and guidelines contained in Title 24 outdoor lighting standards (CEC 2022), CSU Outdoor Lighting Design Guide (CSU 2018), and CSU Executive Order 0987 related to interior and exterior lighting (see Impact 4.1-2 for additional information). As such, implementation of near-term projects would not conflict with regulations governing scenic quality and the impacts would be **less than significant**.

Impact 4.1-2 The project could create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. (Potentially Significant)

Program-Level Analysis for Master Plan

Construction

Light and glare associated with the existing campus arrangement are generated by existing land uses (e.g., academic structures, athletic facilities, and security lighting). Short-term light and glare impacts associated with

construction of proposed Master Plan components likely would be limited to nighttime lighting for security purposes. On-campus residential uses and off-campus residential uses (to the north along San Dimas Avenue and to the south and west along Valley Boulevard) located in proximity to proposed Master Plan components could potentially be affected by on-campus construction lighting. In the absence of shielding of construction lighting, short-term light and glare impacts to motorists or adjacent residences could result in a **potentially significant**.

To avoid impacts to motorists and residences located adjacent to construction activities on individual project sites proposed for development under the proposed Master Plan, MM-AES-1 would require construction lighting be arranged so that lighting will not directly shine on or produce glare for adjacent street traffic and residential uses. With the implementation of this mitigation measure, construction-related nighttime lighting would not impact motorists or residences, impacts would be reduced to **less than significant.**

Operations

Light. The Cal Poly Pomona campus is in an urbanized area that includes a number of lighting sources. Proposed Master Plan components would result in the removal of existing light sources (associated with demolition) and introduce new street (mobility and circulation improvements) and interior and exterior building light sources (new construction and renovation of existing buildings). Various primary light sources during the evening hours would be introduced to the area following Master Plan implementation.

Given the reorganization of campus facilities and spatial resources, the amount of lighting would marginally increase compared to existing conditions. In addition, the introduction of some amount of nighttime light is inevitable, due to safety requirements (e.g., street and parking lot lighting). However, all permanent lighting would conform with applicable state and CSU lighting standards and guidelines contained in Title 24 outdoor lighting standards (CEC 2022), CSU Outdoor Lighting Design Guide (CSU 2018), and CSU Executive Order 0987 related to interior and exterior lighting. With compliance with these requirements, it is not expected that the proposed Master Plan would create substantial light such that nighttime views would be substantially affected. Therefore, the impact of the proposed Master Plan related to new sources of light would be **less than significant.**

Glare. Because Cal Poly Pomona is located adjacent to several major roadways, including I-10, SR-57, South Campus Drive, and Temple Avenue, glare resulting from implementation of the proposed Master Plan could create annoyances for residences and/or hazards for passing motorists along adjacent roadways. Glare from new lighting systems would be minimized or avoided through the implementation of Title 24, the CSU Executive Order 0987, and CSU Outdoor Lighting Design Guide described above. However, the proposed Master Plan components may result in significant reflective surfaces on new or renovated buildings, if not properly designed, which could result in a new source of glare. Therefore, the impact of the proposed Master Plan related to new sources of glare would be **potentially significant**.

Impacts related to new sources of glare would be reduced to a level below significant with implementation of MM-AES-2, which ensures design of individual components under the proposed Master Plan would not include large expanses of reflective glass or reflective metal surfaces. With implementation of MM-AES-2, impacts of the proposed Master Plan related to new sources of glare would be reduced to **less than significant**.

Project-Level Analysis for Near-Term Projects

The above discussion for the proposed Master Plan also applies to the near-term projects. As for the proposed Master Plan, the construction impacts of the near-term projects related to short-term light and glare would be **potentially significant**. The operational impacts associated with glare from new lighting systems would be minimized or avoided

through the implementation of Title 24, the CSU Executive Order 0987, and CSU Outdoor Lighting Design Guide described above. However, the near-term projects may result in significant reflective surfaces on new or renovated buildings, which could result in a new source of glare. Therefore, the operational impact of the near-term projects related to new sources of glare would be **potentially significant**.

All near-term development components would be required to adhere to the same mitigation measures described above for the proposed Master Plan (MM-AES-1 and MM-AES-2). With implementation of MM-AES-1 and MM-AES-2, impacts of the near-term projects related to new sources of light and glare would be reduced to **less than significant**.

4.1.4.3 Cumulative Impacts

Impact 4.1-3 The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to aesthetics. (Less than Significant)

This section provides an evaluation of aesthetics impacts associated with the proposed Master Plan, including near-term development components, when considered together with other reasonably foreseeable cumulative development, as relevant to this topic.

The geographic context for the analysis of cumulative impacts related to aesthetics includes the Cal Poly Pomona campus and the immediate vicinity, particularly the adjacent areas within the City of Pomona, the City of Walnut and unincorporated Los Angeles County. As previously discussed in Impact 4.1-1 and Impact 4.1-2, the proposed Master Plan includes compliance with Title 24, the CSU Executive Order 0987, and CSU Outdoor Lighting Design Guide and mitigation measures (MM-AES-1 and MM-AES-2) to ensure that future campus development implemented as part of the proposed Master Plan would not result in significant impacts related to degradation of scenic quality, and creation of substantial new sources of light and glare.

As shown in Section 4.0, Environmental Analysis, Figure 4.0-1, cumulative projects are located off campus within an 8-mile radius of the proposed Master Plan area. Four cumulative projects are located within 1 mile of the proposed Master Plan boundary. This includes the California Highway Patrol (CHP) Baldwin Park Area Office Replacement, the Double Tree Hotel Expansion, the Elephant Hill project, and several projects at Mt San Antonio Community College. These cumulative projects would be located in already developed areas with similar uses. The CHP office replacement project would be required to comply with applicable state lighting standards and guidelines contained in Title 24 outdoor lighting standards and other state requirements. The other off-campus cumulative projects would be required to comply with the local zoning standards, design standards, and other aesthetic regulations of the cities of Pomona and Walnut and County of Los Angeles that guide the maintenance of scenic quality and minimization of light and glare. Therefore, the adverse effects of off-campus cumulative development on scenic quality and light and glare would generally be avoided through the application of these standards and regulations. Cumulative impacts related to scenic quality and light and glare would be **less than significant.**

4.1.5 Mitigation Measures

MM-AES-1 Construction Lighting Controls. During construction, Cal Poly Pomona shall take steps necessary to ensure that temporary construction-related security lighting is arranged in such a manner that lighting will not directly shine on or produce glare on adjacent motorists and residential uses.

MM-AES-2 Glare Controls. During the preparation of final site design plans for projects implemented under the proposed Master Plan, Cal Poly Pomona shall ensure all building structures will not contain

large expanses of reflective glass or reflective metal surfaces that would cause undue glare to passing motorists and/or present a visual hazard to adjacent land uses.

4.1.6 Level of Significance After Mitigation

Implementation of MM-AES-1 and MM-AES-2 would reduce the potentially significant impacts of the proposed Master Plan, including near-term projects, related to light and glare (Impact 4.1-2) to **less than significant**.

4.1.7 References

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4.2 Agriculture and Forestry Resources

The following analysis identifies potential impacts to agriculture and forestry resources resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing agriculture and forestry conditions in the proposed Master Plan area, identifies associated regulatory requirements, evaluates potential impacts, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts.

No comments related to agricultural and forestry resources were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are included in Appendix A.

4.2.1 Environmental Setting

Agriculture is not a predominant industry in Los Angeles County or the Cities of Walnut and Pomona. Despite the lack of agriculture industry in the vicinity of Cal Poly Pomona, the campus supports agricultural facilities and reserves. Existing agricultural facilities, which support the College of Agriculture, are located throughout the perimeter of the main campus. The W.K. Kellogg Arabian Horse Center and horse pastures are located in the northeast portion of the main campus. Agricultural Field Laboratories are located in the northeast and the western portions of the main campus. The Agricultural Field Laboratories in the northeast include pastures, groves, and greenhouses, which are located on flat topography. The Agricultural Field Laboratories in the western portion of the main campus include pastures on rolling hills, and several structures which support livestock. The AGRIscapes Center located west of the main campus on Temple Avenue on the southeast side of campus covers 20 acres of farmland and facilities, including The Farm Store at Kellogg Ranch which sells produce grown on campus and a large greenhouse complex (Cal Poly Pomona 2025a). The Lyle Center for Regenerative Studies located on the southwest side of campus includes a living laboratory with a sustainable farm (Cal Poly Pomona 2025b) (see Figure 3-2 and Figure 3-3 in Chapter 3, Project Description).

4.2.1.1 Important Farmland

The California Department of Conservation (DOC) is required to prepare Important Farmland series maps. The DOC's Farmland Mapping and Monitoring Program (FMMP) identifies agricultural farmland categories for lands in California. "Important Farmland" includes Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Farmland of Local Potential, for those counties that choose to define it. Farmland of Local Potential is considered a subcategory of Farmland of Local Importance. In contrast, grazing land is considered agricultural land under the FMMP but is not considered Important Farmland. All Important Farmland categories and grazing land are considered agricultural land. Descriptions of the FMMP land use categories are described below in Section 4.2.2, Regulatory Setting.

According to the 2020 FMMP maps, Important Farmland covers approximately 99 acres of the proposed Master Plan area. Important Farmland area and additional FMMP land uses are shown in Figure 4.2-1. As shown in Figure 4.2-1, the areas of Important Farmland overlap with the Agriculture Field Laboratory area north of South University Drive and west of Kellogg Drive; the Agriculture Field Laboratory area east of the W.K. Kellogg Arabian Horse Center, south of Citrus Lane, west of South Campus Drive, and north of Kellogg Drive; the area south of East Campus Drive, west South Campus Drive, and north of the Rose Float Laboratory (Building 64) and Facilities Planning & Management (Building 81) and Environmental Health & Safety (Building 81A) buildings, and the area south of South University Drive between the beef unit and the swine unit. Table 4.2-1 depicts the total acres of each

FMMP category in the proposed Master Plan area. As shown in Table 4.2-1, Prime Farmland makes up the largest amount of Important Farmland in the proposed Master Plan area while most of the campus is dominated by Urban and Built-Up Land and Other Land. As shown in Table 4.2-1, the campus contains 99 acres of Important Farmland.

Table 4.2-1. Important Farmland in the Proposed Master Plan Area

FMMP Designation	Acres in proposed Master Plan Area
Prime Farmland	56
Unique Farmland	3
Farmland of Statewide Importance	40
Farmland of Local Importance	0
Grazing Land	3
Urban and Built-Up Land	545
Other Land	326

Source: DOC 2024a.

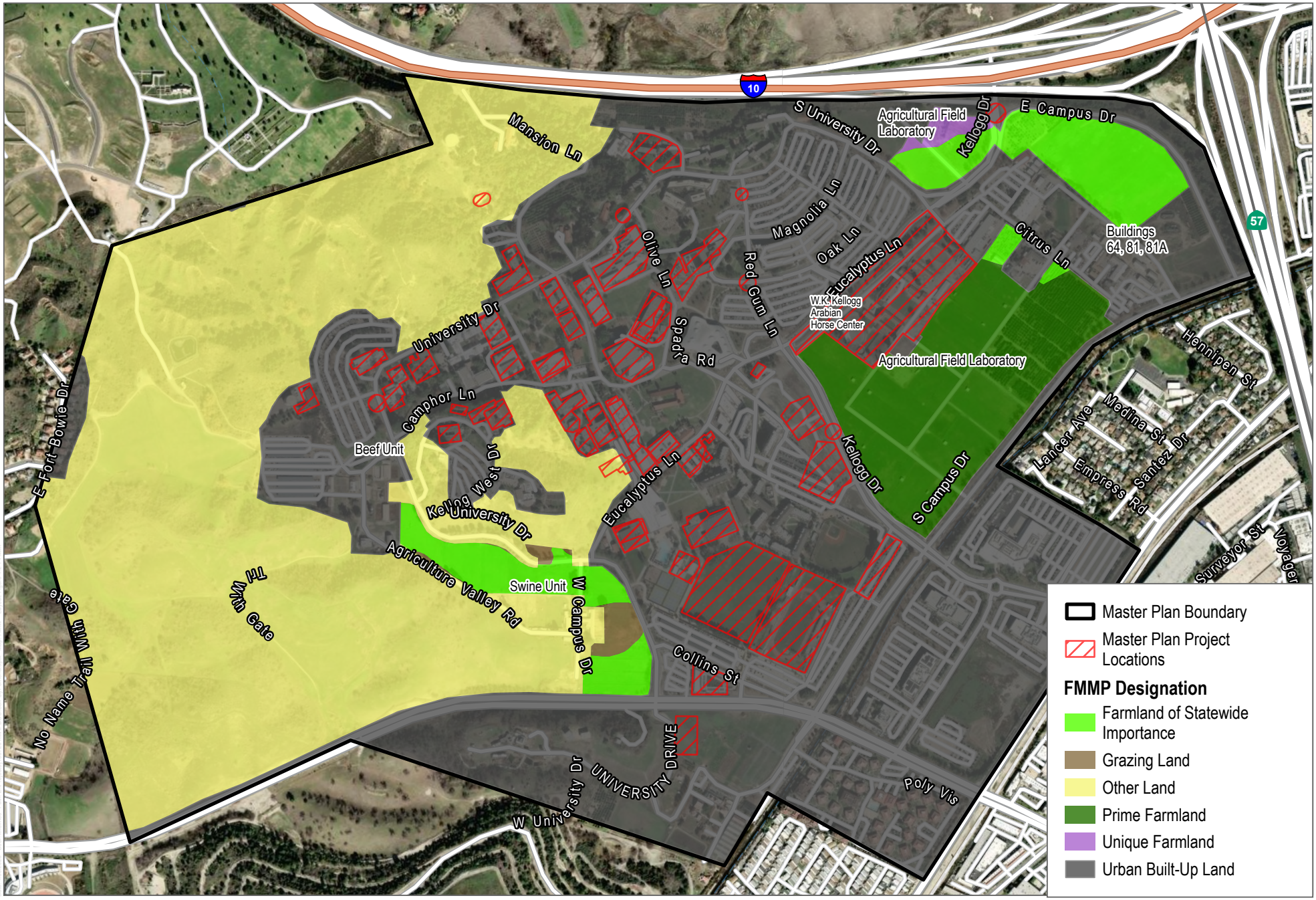
4.2.1.2 Williamson Act Lands

The Williamson Act preserves agricultural and open space land while also providing tax incentives to landowners that voluntarily restrict their land to agricultural and compatible open space uses through a 10-year contract. There are no Williamson Act lands within the proposed Master Plan area (DOC 2023).

4.2.1.3 Forest Land and Forestry Resources

Forestry resources include forestland, timberland, and timberland production zones. Definitions used for these categories are those found in the Public Resources Code (PRC) and California Government Code. Forestland is defined as land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forestry resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits (PRC Section 12220[g]). Timberland is land, other than land owned by the federal government or land that is designated as experimental forest, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products (PRC Section 4526). Timberland production zones are areas that have been devoted to and used for growing and harvesting timber and compatible uses (Government Code Section 51104[g]).

Existing trees within the proposed Master Plan area are located within existing open space areas, agricultural education use areas, and the Voorhis Ecological Reserve, or retained as landscaping in and around structures. Based on the above definitions, lands within the proposed Master Plan area are not considered forestry or timber-production lands, nor are they designated as forestland.



SOURCE: CA Department of Conservation 2018; World Imagery; Open Streets

DUDEK

0 500 1,000 Feet

FIGURE 4.2-1

Department of Conservation Farmland Mapping and Monitoring Program

Cal Poly Pomona Campus Master Plan EIR

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4.2.2 Regulatory Setting

4.2.2.1 Federal

Farmland Protection Policy Act (7 United States Code Section 4201)

In 1981, Congress passed the Agriculture and Food Act (Public Law 97-98), which contained the Farmland Protection Policy Act (FPPA), Subtitle I of Title XV, Sections 1539–1549. The purpose of the FPPA is to minimize the extent to which federal programs contribute to the unnecessary and irreversible conversion of farmland to nonagricultural uses. It additionally directs federal programs to be compatible with state and local policies for the protection of farmland. Under the FPPA, the term "farmland" includes Prime Farmland, Unique Farmland, and Farmland of Statewide or Local Importance. Farmland that is subject to FPPA requirements does not have to be currently used as cropland. It can be Forestland, Pastureland, or Other Land but not Urban and Built-Up Land or water. FPPA assures that, to the extent possible, federal programs are administered to be compatible with state and local units of government, and private programs and policies to protect farmland. Federal agencies are required to develop and review their policies and procedures related to implementing the FPPA every 2 years. The FPPA does not authorize the federal government to regulate the use of private or nonfederal land or, in any way, affect the property rights of owners. Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a federal agency or rely on assistance from a federal agency (NRCS 2024).

4.2.2.2 State

California Department of Conservation Farmland Mapping and Monitoring Program

Farmland in California is classified and mapped according to the California Natural Resources Agency, Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP). Authority for the FMMP comes from Government Code Section 65570(b) and PRC Section 612. The FMMP was established in 1982 to continue the Important Farmland mapping efforts begun in 1975 by the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS), which mapped farmlands based on soil quality and land use and classified the land's suitability for agricultural production accordingly (DOC 2004). The FMMP, like the NRCS, classifies agricultural lands according to suitability for agricultural production, but customizes those classifications for California. Collectively, those lands deemed suitable for agricultural production are referred to as Important Farmland. Government Code Section 65570(b) requires DOC to collect or acquire information on the amount of land converted to or from agricultural use for every mapped county, with a minimum map unit size of 10 units, and to report this information to the state legislature for purposes of planning for the future of California's agricultural land resources. PRC Section 612 requires DOC to prepare, update, and maintain Important Farmland series maps and other soils and land capability information.

FMMP agricultural farmland categories are defined by the DOC as follows (DOC 2024b):

- **Prime Farmland:** Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

- **Farmland of Statewide Importance**: Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Farmland of Local Importance:** Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.
- **Farmland of Local Potential:** Farmland of Local Potential is a subcategory of Farmland of Local Importance and aggregated with Farmland of Local Importance acreage in the land use conversion table. Los Angeles County does not include Farmland of Local Potential as a subcategory or Farmland of Local Importance.
- **Unique Farmland:** Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.
- **Grazing Land:** Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities.
- **Urban and Built-up Land:** Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.
- **Other Land:** Land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.
- **Water:** Perennial water bodies with an extent of at least 40 acres.

Section 21095 of the CEQA statute and the State CEQA Guidelines Appendix G define three of the FMMP's Important Farmland categories—Prime Farmland, Farmland of Statewide Importance, and Unique Farmland—as agricultural lands for purposes of CEQA analysis and acknowledge that their conversion to nonagricultural uses may be considered a significant impact. Important Farmland, within the context of CEQA, is not limited to active agricultural land but refers to land that has been designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the FMMP, which may include open space.

California Land Conservation Act of 1965 (Williamson Act)

The Williamson Act (Government Code Section 51200 et seq.) provides tax incentives to retain prime agricultural land and open space in agricultural use, which slows its conversion to urban development. The Williamson Act requires a 10-year contract between the County and landowners who enter into contracts requiring the land to be used for commercial agriculture and compatible uses in exchange for the land being taxed based on its agricultural use rather than its full market value. The overall purpose of the Williamson Act is to protect agricultural lands from conversion to other uses.

The Williamson Act program is administered by the DOC, in conjunction with local governments that administer and enforce the individual contracts. Each year the contract automatically renews unless a notice of nonrenewal is filed by the local government or landowner. Contracts may only be canceled if strict findings are made.

Williamson Act contract enrollment status definitions are defined by the DOC as follows (DOC 2023):

- **Prime Agricultural Land:** Land which is enrolled under Williamson Act contract and meets any of the following criteria:
  1. Land which qualifies for rating as class I or class II in the Natural Resources Conservation Service land use capability classifications;
  2. Land which qualifies for rating 80 to 100 in the Storie Index Rating;
  3. Land which supports livestock used for the production of food and fiber and which has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture;
  4. Land planted with fruit or nut-bearing trees, vines, bushes or crops which have a nonbearing period of less than five years and which will normally return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than two hundred dollars per acre; and
  5. Land which has returned from the production of unprocessed agricultural plant production and has an annual gross value of not less than two hundred dollars per acre for three of the previous five years.
- **Non-Prime Agricultural Land:** Land which is enrolled under Williamson Act contract and does not meet any of the criteria for classification as Prime Agricultural Land. Non-Prime Land is defined as Open Space Land of Statewide Significance under the California Open Space Subvention Act, and may be identified as such in other documents. Most Non-Prime Land is in agricultural uses such as grazing or non-irrigated crops. However, Non-Prime Land may also include other open space uses which are compatible with agriculture and consistent with local General Plans.
  - **Non-renewal Land:** Enrolled lands for which non-renewal has been filed. Upon the filing of non-renewal, the existing contract remains in effect for the balance of the period remaining on the contract. During the non-renewal process, the annual tax assessment gradually increases. At the end of the 9-year non-renewal period, the contract expires and the land is no longer restricted.
  - **Mixed Enrollment Agriculture Land:** Enrolled lands containing a combination of Prime, Non-Prime, Open Space Easement, or other contracted or enrolled lands not yet delineated by the county.

Farmland Security Zones

The Farmland Security Zone Act was passed by the California State Legislature in 1999 to ensure that long-term farmland preservation is part of public policy in the state. The intent of the act is similar to the Williamson Act. The Farmland Security Zone Act contracts are sometimes referred to as “Super Williamson Act Contracts.” Under the provisions of this act, a landowner who is already under a Williamson Act contract can apply for Farmland Security Zone status by entering into a contract with the County. Farmland Security Zone classification automatically renews each year for an additional 20 years. In return for a further 35% reduction in the taxable value of land and growing improvements (in addition to Williamson Act tax benefits), the owner of the property will not be able to develop the property into nonagricultural uses.

California Department of Forestry and Fire Protection

The California Department of Forestry and Fire Protection (CAL FIRE) enforces the laws that regulate logging on nonfederal lands in California. CAL FIRE also provides periodic assessments of forest resources within California as part of the Forest and Range Assessment Project. The most recent assessment is the 2017 Assessment, which

presents an assessment of the trends, conditions, and degree to which forestland conversion has occurred. CAL FIRE also maintains the Forest Legacy Program, which is intended to identify and protect environmentally important forestlands that are threatened by conversion of land to non-forest uses by either purchase or through deed restrictions, such as conservation easements.

4.2.2.3 Local

Cal Poly Pomona is an entity of the California State University, which is a state agency, and is therefore not subject to local government planning and land use plans, policies, or regulations. The proposed Master Plan would be subject to state and federal agency planning documents described herein but would not be bound by local or regional planning regulations or documents such as the General Plans or municipal codes. Local zoning maps for the City of Pomona, City of Walnut, and County of Los Angeles were reviewed to provide context for the analysis of potential conflicts with local zoning for agricultural or forestry lands, as such analysis is required to address one of the standards of significance presented in Section 4.2.3, Thresholds of Significance and Methodology.

4.2.3 Thresholds of Significance and Methodology

4.2.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section 15064.7). The significance criteria used to evaluate the proposed Master Plan impacts to agriculture and forestry resources are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to agriculture and forestry resources would occur if the proposed Master Plan would:

1. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
2. Conflict with existing zoning for agricultural use, or a Williamson Act contract.
3. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).
4. Result in the loss of forest land or conversion of forest land to non-forest use.
5. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

4.2.3.2 Methodology

Impacts to agricultural and forestry resources were evaluated using local zoning maps and the DOC's Important Farmland series, as shown in Figure 4.2-1, and Williamson Act maps.

4.2.4 Impact Analysis

4.2.4.1 Issues Not Further Evaluated

The proposed Master Plan would have no impact with respect to the following thresholds of significance and therefore these topics are not further evaluated:

- **Zoning Conflict with Forest Land.** The proposed Master Plan area does not contain land zoned for forestland, timberland, or timberland production (City of Pomona 2024; City of Walnut 2020; County of Los Angeles 2024b). As such, implementation of the proposed Master Plan would have **no impact** on existing zoning for forest land, timberland, or timberland zoned timberland production.
- **Loss or Conversion of Forest Land.** The proposed Master Plan area predominately comprises land that has been developed to support the Cal Poly Pomona campus. The proposed Master Plan area contains existing trees located throughout the campus; however, none of these areas are considered forestry or timber-production lands, nor are they designated as forestland. Additionally, the proposed Master Plan would not involve other changes in the existing environment that would otherwise indirectly lead to the conversion of any off-campus forest land, as the surrounding areas do not contain any forestland, timberland, or timberland production zones. As such, implementation of the proposed Master Plan would not result in the direct or indirect loss of forest land or conversion of forest land to a non-forest use. **No impact** would occur.

4.2.4.2 Project Impacts

Impact 4.2-1 **The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. (Less than Significant)**

As described in Section 4.2.1.1, Important Farmland, the proposed Master Plan area contains 99 acres of Important Farmland. As shown in Figure 4.2-1, the areas of Important Farmland do not overlap with the proposed Master Plan, including near-term projects. Development proposed under the Master Plan would occur in areas designated as Urban and Built-Up Land or Other Land. Although the proposed Master Plan area does contain land designated as Important Farmland, implementation of the proposed Master Plan, including near-term projects, would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. These areas designated as Important Farmland would remain as is with implementation of the Master Plan. As such, the impact of the proposed Master Plan, including near-term projects, related to the conversion of Important Farmland to non-agricultural use would be **less than significant**.

Impact 4.2-2 **The project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. (Less than Significant)**

The portion of the proposed Master Plan area in the Cities of Pomona and Walnut do not contain areas zoned for agricultural uses (City of Pomona 2024; City of Walnut 2020). The portion of the proposed Master Plan area in Los Angeles County is zoned A-1-7000 (County of Los Angeles 2024b). According to the Los Angeles County zoning code, A-1 zoning is a light agricultural zone that allows for low-density residential uses and limited agriculture activities (County of Los Angeles 2024c). The majority of the proposed Master Plan area located in Los Angeles County has been developed with campus buildings and is not used for agricultural purposes. Further,

as discussed under Impact 4.2-1 above, implementation of the proposed Master Plan, including near-term projects, would not convert Important Farmland to non-agricultural use. Additionally, the proposed Master Plan area is not subject to a Williamson Act contract (DOC 2023). As such, the impact of the proposed Master Plan, including near-term projects, related to conflicts with existing zoning for agricultural use or a Williamson Act contract would be **less than significant**.

Impact 4.2-3 The project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use. (Less than Significant)

The conversion of agricultural lands to nonagricultural uses through development in the vicinity of other agricultural land can introduce conflicts between developed uses and agricultural operations and has the potential to indirectly result in conversion of agricultural lands. With respect to the proposed Master Plan, further development of the campus and general economic and population growth in the region could result in development pressures or land use conflicts. Planning for contiguous development and other land use decisions may cause conversion of agricultural uses to nonagricultural uses to accommodate growth projections.

However, development associated with implementation of the proposed Master Plan, including near-term projects, would do so entirely within the confines of the existing Cal Poly Pomona main campus, following the same development pattern, and as a result would not result in sprawl, expansion of the urban growth boundary, or the need for new infrastructure where none exists and would not otherwise indirectly lead to the conversion of any off-campus Important Farmland. As discussed above, implementation of the proposed Master Plan, including near-term projects, would not result in the conversion of Important Farmland to non-agricultural uses. Therefore, the impact of the proposed Master Plan, including near-term projects, due to the indirect conversion of agricultural lands to non-agricultural uses would be **less than significant.**

4.2.4.3 Cumulative Impacts

Impact 4.2-4 The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to agricultural resources. (Less than Significant)

The cumulative setting for agricultural resources includes the areas surrounding and adjacent to the Cal Poly Pomona campus. The areas surrounding the campus comprise Urban and Built-Up Land and Other Land, and contain no land designated as Important Farmland. Implementation of the proposed Master Plan would not directly or indirectly convert Important Farmland to non-agricultural uses. As such, the construction or operation of proposed Master Plan would not combine with cumulative projects in a manner that would result in a cumulatively considerable impact related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

There are no Williamson Act contract lands in the vicinity of the proposed Master Plan area (DOC 2023). The Cities of Walnut and Pomona do not contain areas zoned for agricultural use in the vicinity of the proposed Master Plan area (City of Pomona 2024; City of Walnut 2020). As discussed under Impact 4.2-2, the Los Angeles County portion of the proposed Master Plan area is zoned for light agricultural use. However, most of this land has been previously developed and does not support agricultural uses. Thus, implementation of the proposed Master Plan would not combine with cumulative projects in a manner that would result in a cumulatively considerable impact

related to a conflict with land zoned for agriculture or under Williamson Act contract. The cumulative impact would be **less than significant.**

4.2.5 Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

4.2.6 Level of Significance After Mitigation

All impacts would be less than significant without mitigation.

4.2.7 References

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4.3 Air Quality

The following analysis identifies potential impacts to air quality resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing air quality conditions in the proposed Master Plan area, discusses the regulatory setting, evaluates potential impacts to air quality, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts. Air quality model outputs are provided in Appendix B.

No comments related to air quality were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are provided in Appendix A.

4.3.1 Environmental Setting

4.3.1.1 Meteorological and Topographical Conditions

The primary factors that determine air quality are the locations of air pollutant sources and the amount of pollutants emitted. Meteorological and topographical conditions, however, are also important. Factors such as wind speed and direction, air temperature gradients and sunlight, and precipitation and humidity interact with physical landscape features to determine the movement and dispersal of air pollutants. The air pollution conditions in the South Coast Air Basin (SCAB) are a consequence of the combination of emissions from the nation's second largest urban area, meteorological conditions adverse to the dispersion of those emissions, and mountainous terrain surrounding the SCAB that traps pollutants as they are pushed inland with the sea breeze (SCAQMD 2017). Meteorological and topographical factors that affect air quality in the SCAB are described below.

Climate

The SCAB is characterized as having a Mediterranean climate (typified as semiarid with mild winters, warm summers, and moderate rainfall). The general region lies in the semi-permanent high-pressure zone of the eastern Pacific; as a result, the climate is mild and tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the SCAB is a function of the area's natural physical characteristics (e.g., weather and topography) and of manufactured influences (e.g., development patterns and lifestyle). Moderate temperatures, comfortable humidity, and limited precipitation characterize the climate in the SCAB. The average annual temperature varies little throughout the SCAB, averaging 75°F. However, with a less-pronounced oceanic influence, the eastern inland portions of the SCAB show greater variability in annual minimum and maximum temperatures. All portions of the SCAB have recorded temperatures over 100°F in recent years. Although the SCAB has a semiarid climate, the air near the surface is moist because of the presence of a shallow marine layer. Except for infrequent periods when dry air is brought into the SCAB by offshore winds, the ocean effect is dominant. Periods with heavy fog are frequent, and low stratus clouds, occasionally referred to as "high fog," are a characteristic climate feature. Annual average relative humidity is 70% at the coast and 57% in the eastern part of the SCAB. Precipitation in the SCAB is typically 9–14 inches annually and is rarely in the form of snow or hail because of typically warm weather. The frequency and amount of rainfall is greater in the coastal areas of the SCAB.

Sunlight

The presence and intensity of sunlight are necessary prerequisites for the formation of photochemical smog. Under the influence of the ultraviolet radiation of sunlight, certain "primary" pollutants (mainly reactive hydrocarbons and oxides of nitrogen [NO_x]) react to form "secondary" pollutants (primarily oxidants). Since this process is time dependent, secondary pollutants can be formed many miles downwind of the emission sources. Southern California also has abundant sunshine, which drives the photochemical reactions that form pollutants such as ozone (O_3) and a substantial portion of particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). In the SCAB, high concentrations of O_3 are normally recorded during the late spring, summer, and early autumn months, when more intense sunlight drives enhanced photochemical reactions. Due to the prevailing daytime winds and time-delayed nature of photochemical smog, oxidant concentrations are highest in the inland areas of Southern California.

Temperature Inversions

Under ideal meteorological conditions and irrespective of topography, pollutants emitted into the air mix and disperse into the upper atmosphere. However, the Southern California region frequently experiences temperature inversions in which pollutants are trapped and accumulate close to the ground. The inversion, a layer of warm, dry air overlaying cool, moist marine air, is a normal condition in coastal Southern California. The cool, damp, and hazy sea air capped by coastal clouds is heavier than the warm, clear air, which acts as a lid through which the cooler marine layer cannot rise. The height of the inversion is important in determining pollutant concentration. When the inversion is approximately 2,500 feet above mean sea level, the sea breezes carry the pollutants inland to escape over the mountain slopes or through the passes. At a height of 1,200 feet above mean sea level, the terrain prevents the pollutants from entering the upper atmosphere, resulting in the pollutants settling in the foothill communities. Below 1,200 feet above mean sea level, the inversion puts a tight lid on pollutants, concentrating them in a shallow layer over the entire coastal basin. Usually, inversions are lower before sunrise than during daylight hours.

Mixing heights for inversions are lower in the summer, resulting in inversions being more persistent during that season. This condition is partly responsible for the high levels of O_3 observed during summer months in the SCAB. Smog in Southern California is generally the result of these temperature inversions combining with coastal day winds and local mountains to contain the pollutants for long periods, allowing them to form secondary pollutants by reacting in the presence of sunlight. The SCAB has a limited ability to disperse these pollutants due to typically low wind speeds and the surrounding mountain ranges.

Cities within the SCAB are susceptible to air inversions, which trap a layer of stagnant air near the ground where pollutants are further concentrated. These inversions produce haziness, which is caused by moisture, suspended dust, and a variety of chemical aerosols emitted by trucks, automobiles, furnaces, and other sources.

Elevated concentrations of particles less than 10 microns in diameter (PM_{10}) and $PM_{2.5}$ can occur in the SCAB throughout the year but occur most frequently in fall and winter. The deficit of normal storm systems from late fall through the winter and early spring allow for more stagnant conditions in the SCAB due to the lack of storm-related dispersion and rain-out of particulate matter and its precursors. Although there are some changes in emissions by day of the week and season, the observed variations in pollutant concentrations are primarily the result of seasonal differences in weather conditions.

4.3.1.2 Pollutants and Effects

Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The national and California standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include O_3, nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), PM_{10}, $PM_{2.5}$, and lead. In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants. These pollutants, as well as toxic air contaminants (TACs), are discussed in the following paragraphs.[1]

Ozone. O_3 is a strong-smelling, pale blue, reactive, toxic chemical gas consisting of three oxygen atoms. It is a secondary pollutant formed in the atmosphere by a photochemical process involving the sun's energy and O_3 precursors. These precursors are mainly NO_x and volatile organic compounds (VOCs). The maximum effects of precursor emissions on O_3 concentrations usually occur several hours after they are emitted and many miles from the source. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. O_3 exists in the upper atmosphere O_3 layer (stratospheric O_3) and at the Earth's surface in the troposphere (ground-level O_3).[2] The O_3 that the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) regulate as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. Ground-level O_3 is a harmful air pollutant that causes numerous adverse health effects and is thus considered "bad" O_3. Stratospheric, or "good," O_3 occurs naturally in the upper atmosphere, where it reduces the amount of ultraviolet light (i.e., solar radiation) entering the Earth's atmosphere. Without the protection of the beneficial stratospheric O_3 layer, plant and animal life would be seriously harmed.

O_3 in the troposphere causes numerous adverse health effects; short-term exposures (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes (EPA 2013).

Inhalation of O_3 causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms. Exposure to O_3 can reduce the volume of air that the lungs breathe in, thereby causing shortness of breath. O_3 in sufficient doses increases the permeability of lung cells, rendering them more susceptible to toxins and microorganisms. The occurrence and severity of health effects from O_3 exposure vary widely among individuals, even when the dose and the duration of exposure are the same. Research shows adults and children who spend more time outdoors participating in vigorous physical activities are at greater risk from the harmful health effects of O_3 exposure. While there are relatively few studies on the effects of O_3 on children, the available studies show that children are no more or less likely to suffer harmful effects than adults. However, there are a number of reasons why children may be more susceptible to O_3 and other pollutants. Children and teens spend nearly twice as much time outdoors and engaged in vigorous activities as adults. Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults. Also, children are less likely than

1 The descriptions of the criteria air pollutants and associated health effects are based on the U.S. Environmental Protection Agency's "Criteria Air Pollutants" (EPA 2025a) as well as the California Air Resources Board's "Glossary" (CARB 2025a).

2 The troposphere is the layer of the Earth's atmosphere nearest to the surface of the Earth. The troposphere extends outward about 5 miles at the poles and about 10 miles at the equator.

adults to notice their own symptoms and avoid harmful exposures. Further research may be able to better distinguish between health effects in children and adults. Children, adolescents, and adults who exercise or work outdoors, where O_3 concentrations are the highest, are at the greatest risk of harm from this pollutant (CARB 2025b).

Nitrogen Dioxide. NO_2 is a brownish, highly reactive gas that is present in all urban atmospheres. The major mechanism for the formation of NO_2 in the atmosphere is the oxidation of the primary air pollutant nitric oxide, which is a colorless, odorless gas. NO_x plays a major role, together with VOCs, in the atmospheric reactions that produce O_3. NO_x is formed from fuel combustion under high temperature or pressure. In addition, NO_x is an important precursor to acid rain and may affect both terrestrial and aquatic ecosystems. The two major emissions sources are transportation and stationary fuel combustion sources such as electric utility and industrial boilers. NO_2 can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections (EPA 2025a).

A large body of health science literature indicates that exposure to NO_2 can induce adverse health effects. The strongest health evidence, and the health basis for the ambient air quality standards for NO_2, results from controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics. In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses. Infants and children are particularly at risk because they have disproportionately higher exposure to NO_2 than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration. Several studies have shown that long-term NO_2 exposure during childhood, the period of rapid lung growth, can lead to smaller lungs at maturity in children with higher levels of exposure compared to children with lower exposure levels. In addition, children with asthma have a greater degree of airway responsiveness compared with adult asthmatics. In adults, the greatest risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease (CARB 2025c).

Carbon Monoxide. CO is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon, or fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, such as the Master Plan area, automobile exhaust accounts for the majority of CO emissions. CO is a nonreactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions—primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November to February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent.

CO is harmful because it binds to hemoglobin in the blood, reducing the ability of blood to carry oxygen. This interferes with oxygen delivery to the body's organs. The most common effects of CO exposure are fatigue, headaches, confusion and reduced mental alertness, light-headedness, and dizziness due to inadequate oxygen delivery to the brain. For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress. Inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance. Unborn babies whose mothers experience high levels of CO exposure during pregnancy are at risk of adverse developmental effects. Unborn babies, infants, elderly people, and people with anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO (CARB 2025d).

Sulfur Dioxide. SO_2 is a colorless, pungent gas formed primarily from incomplete combustion of sulfur-containing fossil fuels. The main sources of SO_2 are coal and oil used in power plants and industries; as such, the highest levels of SO_2 are generally found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary-source emissions of SO_2 and limits on the sulfur content of fuels.

Controlled human exposure and epidemiological studies show that children and adults with asthma are more likely to experience adverse responses with SO_2 exposure, compared with the non-asthmatic population. Effects at levels near the 1-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath, and chest tightness, especially during exercise or physical activity. Also, exposure at elevated levels of SO_2 (above 1 part per million [ppm]) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of death. Older people and people with cardiovascular disease or chronic lung disease (such as bronchitis or emphysema) are most likely to experience these adverse effects (CARB 2025e).

SO_2 is of concern both because it is a direct respiratory irritant and because it contributes to the formation of sulfate and sulfuric acid in particulate matter (NRC 2005). People with asthma are of particular concern, both because they have increased baseline airflow resistance and because their SO_2-induced increase in airflow resistance is greater than in healthy people, and it increases with the severity of their asthma (NRC 2005). SO_2 is thought to induce airway constriction via neural reflexes involving irritant receptors in the airways (NRC 2005).

Particulate Matter. Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter. Coarse particulate matter (PM_{10}) consists of particulate matter that is 10 microns or less in diameter, which is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. Fine particulate matter ($PM_{2.5}$) consists of particulate matter that is 2.5 microns or less in diameter, which is roughly 1/28 the diameter of a human hair. $PM_{2.5}$ results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as sulfur oxides (SO_x), NO_x, and VOCs.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances such as lead, sulfates, and nitrates can cause lung damage directly or be absorbed into the bloodstream, causing damage elsewhere in the body. Additionally, these substances can transport adsorbed gases such as chlorides or ammonium into the lungs, also causing injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissue. Suspended particulates also damage and discolor surfaces on which they settle and produce haze and reduce regional visibility.

Several adverse health effects have been associated with exposure to both $PM_{2.5}$ and PM_{10}. For $PM_{2.5}$, short-term exposures (up to 24-hour duration) have been associated with premature death, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms,

and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases. In addition, of all of the common air pollutants, $PM_{2.5}$ is associated with the greatest proportion of adverse health effects related to air pollution, both in the United States and worldwide based on the World Health Organization's Global Burden of Disease Project. Short-term exposures to PM_{10} have been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits (CARB 2017).

Long-term exposure (months to years) to $PM_{2.5}$ has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children. The effects of long-term exposure to PM_{10} are less clear, although several studies suggest a link between long-term PM_{10} exposure and respiratory death. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer (CARB 2017).

Lead. Lead in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturing of batteries, paints, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phaseout of leaded gasoline reduced the overall inventory of airborne lead by nearly 95%. With the phaseout of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emissions sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth. Children are highly susceptible to the effects of lead.

Sulfates. Sulfates are the fully oxidized form of sulfur, which typically occur in combination with metals or hydrogen ions. Sulfates are produced from reactions of SO_2 in the atmosphere and can result in respiratory impairment, as well as reduced visibility.

Vinyl Chloride. Vinyl chloride is a colorless gas with a mild, sweet odor, which has been detected near landfills, sewage plants, and hazardous waste sites, due to the microbial breakdown of chlorinated solvents. Short-term exposure to high levels of vinyl chloride in the air can cause nervous system effects, such as dizziness, drowsiness, and headaches. Long-term exposure through inhalation can cause liver damage, including liver cancer.

Hydrogen Sulfide. Hydrogen sulfide is a colorless and flammable gas that has a characteristic odor of rotten eggs. Sources of hydrogen sulfide include geothermal power plants, petroleum refineries, sewers, and sewage treatment plants. Exposure to hydrogen sulfide can result in nuisance odors, as well as headaches and breathing difficulties at higher concentrations.

Visibility-Reducing Particles. Visibility-reducing particles are any particles in the air that obstruct the range of visibility. Effects of reduced visibility can include obscuring the viewshed of natural scenery, reducing airport safety, and discouraging tourism. Sources of visibility-reducing particles are the same as for $PM_{2.5}$.

Volatile Organic Compounds. Hydrocarbons are organic gases that are formed from hydrogen and carbon and sometimes other elements. Hydrocarbons that contribute to formation of O_3 are referred to and regulated as VOCs

(also referred to as reactive organic gases). Combustion engine exhaust, oil refineries, and fossil-fueled power plants are sources of hydrocarbons. Other sources of hydrocarbons include evaporation from petroleum fuels, solvents, dry cleaning solutions, and paint.

The primary health effects of VOCs result from the formation of O_3 and its related health effects. High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. Carcinogenic forms of hydrocarbons, such as benzene, are considered TACs. There are no separate ambient air quality standards for VOCs as a group.

Non-Criteria Air Pollutants

Toxic Air Contaminants. A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic non-cancer health effects. A toxic substance released into the air is considered a TAC. TACs are identified by federal and state agencies based on a review of available scientific evidence. In the State of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. In addition, the California Air Toxics "Hot Spots" Information and Assessment Act, Assembly Bill (AB) 2588, California Health and Safety Code Section 44300 et seq., was enacted by the legislature in 1987 to address public concern over the release of TACs into the atmosphere. The law requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hotspots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years.

Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources, such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources, such as automobiles; and area sources, such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and non-carcinogenic effects. Non-carcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

The CARB classified "particulate emissions from diesel-fueled engines" (17 CCR 93000) as a TAC in August 1998. Diesel particulate matter is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More than 90% of diesel particulate matter is less than 1 micrometer in diameter (about 1/70 the diameter of a human hair) and thus is a subset of $PM_{2.5}$ (CARB 2025f). Diesel particulate matter is typically composed of carbon particles ("soot," also called black carbon) and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene (CARB 2025f). Diesel particulate matter is emitted from a broad range of diesel engines: on-road diesel engines, including trucks, buses, and cars, and off-road diesel engines, including locomotives, marine vessels, and heavy-duty construction equipment, among others. Approximately 70% of all airborne cancer risk in California is associated with diesel particulate matter (CARB 2000). To reduce the cancer risk associated with diesel particulate matter, CARB adopted a Diesel Risk Reduction Plan in 2000 (CARB 2000). Because it is part of $PM_{2.5}$, diesel particulate matter also contributes to the same non-cancer health effects as $PM_{2.5}$ exposure. These effects include premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children. Several

studies suggest that exposure to diesel particulate matter may also facilitate development of new allergies (CARB 2025f). Those most vulnerable to non-cancer health effects are children, whose lungs are still developing, and older people, who often have chronic health problems.

Odorous Compounds. Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The ability to detect odors varies considerably among the population and overall is quite subjective. People may have different reactions to the same odor. An odor that is offensive to one person may be perfectly acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. In a phenomenon known as odor fatigue, a person can become desensitized to almost any odor, and recognition may only occur with an alteration in the intensity. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors.

Valley Fever. Coccidioidomycosis, more commonly known as "valley fever," is an infection caused by inhalation of the spores of the *Coccidioides immitis* fungus, which grows in the soils of the southwestern United States. The fungus is very prevalent in the soils of California's San Joaquin Valley, particularly in Kern County. The ecologic factors that appear to be most conducive to survival and replication of the spores are high summer temperatures, mild winters, sparse rainfall, and alkaline, sandy soils.

Los Angeles County is not considered a highly endemic county for valley fever (i.e., highly endemic meaning more than 20 cases annually of valley fever per 100,000 people) based on the incidence rates reported through 2023. The latest report from the California Department of Public Health indicates that Los Angeles County had 1,409 cases in 2023, or 14.5 cases per 100,000 people (CDPH 2024).

4.3.1.3 Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. Facilities and structures where these air-pollution-sensitive people live or spend considerable amounts of time are known as sensitive receptors. Land uses where air-pollution-sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses) (CARB 2005). The South Coast Air Quality Management District (SCAQMD) identifies sensitive receptors as residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993).

In the immediate vicinity of the campus, the closest off-site sensitive receptors include single-family residences adjacent to the eastern boundary, Kellogg Polytechnic Elementary School approximately 200 feet from the eastern boundary, residences located in the Pomona Islander Mobile Home Park adjacent to the southeast boundary, and single-family residences adjacent to the western boundary. Furthermore, on-site sensitive receptors would include the existing student residence buildings, existing Cal Poly Pomona Childcare Center, and I-Poly High School.

4.3.1.4 Environmental Conditions

MATES V

The Multiple Air Toxics Exposure Study V (MATES V) is a monitoring and evaluation study conducted in the SCAB. The study is a follow up to previous air toxics studies in the SCAB and is part of the SCAQMD Governing Board Environmental Justice Initiative.

The MATES V Study consists of several elements. These include a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize risk across the SCAB. The study estimated air toxics cancer risks using a risk assessment approach. Additionally, MATES V includes an exploratory analysis of chronic non-cancer health impacts (e.g., cardiovascular, respiratory, neurological health outcomes). The MATES analysis did not estimate impacts on risk of death or other health effects from criteria air pollutant exposures; such analyses are instead conducted as part of air quality management plans (AQMPs).

Toxic air pollution in the SCAB has decreased by more than 54% between 2012 and 2018, but continues to contribute to health risks, including cancers and other chronic diseases. For residents in the SCAB in 2018, exposure to TACs increased the chances of developing cancer by 455 chances in one million (SCAQMD 2018).

At the Master Plan area, the MATES V monitoring data show a cancer risk of 518 to 553 chances in one million. Air toxics cancer risk in this zip code is higher than the risk for 14% to 16% of the SCAQMD population (SCAQMD 2018).

CalEnviroScreen

CalEnviroScreen is a mapping tool that helps identify California communities that are most affected by many sources of pollution, where people are often especially vulnerable to pollution's effects. CalEnviroScreen ranks census tracts in California based on potential exposures to pollutants, adverse environmental conditions, socioeconomic factors and the prevalence of certain health conditions. Data used in the CalEnviroScreen model come from national and state sources.

The proposed Master Plan area is in a disadvantaged community pursuant to Senate Bill 535 (OEHHA 2022) and a Low Income Community pursuant to Assembly Bill (AB) 1550 (CARB 2024a). The Master Plan area is not a Community Air Protection Program pursuant to AB 617 (CARB 2025g).

The Master Plan area achieves scores of 90 to 98 on the CalEnviroScreen (OEHHA 2023). The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Healthy Places

The Healthy Places Index (HPI) is a project of the Public Health Alliance of Southern California. The HPI is a powerful and easy-to-use data and policy platform created to advance health equity through open and accessible data. Neighborhood-by-neighborhood, the HPI maps data on social conditions that drive health—like education, job opportunities, clean air and water, and other indicators that are positively associated with life expectancy at birth. Community leaders, policymakers, academics, and other stakeholders use the HPI to compare the health and well-being of communities, identify health inequities, and quantify the factors that shape health.

The tract that encompasses the majority of the proposed Master Plan area does not have HPI data due to exclusion criteria, but the other tract within the Master Plan area has an HPI score of 28.4 (California Healthy Places Index 2023). The maximum HPI score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

4.3.2 Regulatory Setting

4.3.2.1 Federal

Criteria Air Pollutants

The federal Clean Air Act, 42 USC 7401 et seq., passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. EPA is responsible for implementing most aspects of the Clean Air Act, including setting National Ambient Air Quality Standards (NAAQS) for major air pollutants; setting hazardous air pollutant (HAP) standards; approving state attainment plans; setting motor vehicle emission standards; issuing stationary-source emission standards and permits; and establishing acid rain control measures, stratospheric O_3 protection measures, and enforcement provisions. Under the Clean Air Act, NAAQS are established for the following criteria pollutants: O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead.

The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The NAAQS (other than for O_3, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. NAAQS for O_3, NO_2, SO_2, PM_{10}, and $PM_{2.5}$ are based on statistical calculations over 1- to 3-year periods, depending on the pollutant. The Clean Air Act requires the EPA to reassess the NAAQS at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the NAAQS must prepare state implementation plans that demonstrate how those areas will attain the NAAQS within mandated time frames.

Hazardous Air Pollutants

The 1977 federal Clean Air Act amendments required the EPA to identify National Emission Standards for Hazardous Air Pollutants (HAP) to protect public health and welfare. HAPs include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 federal Clean Air Act amendments, which expanded the control program for HAPs, 187 substances and chemical families were identified as HAPs.

4.3.2.2 State

Criteria Air Pollutants

The federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the NAAQS to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for ensuring implementation of the California Clean Air Act of 1988, California Health and Safety Code Sections 39000–44384, responding to the federal Clean Air Act, and regulating emissions from motor vehicles and consumer products.

CARB has established California Ambient Air Quality Standards (CAAQS), which are generally more restrictive than the NAAQS. As stated previously, an ambient air quality standard defines the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without harm to the public's health. For each pollutant, concentrations must be below the relevant CAAQS before a basin can attain the corresponding CAAQS. Air quality is considered "in attainment" if pollutant levels are continuously below the CAAQS and violate the standards no more than once each year. The CAAQS for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, PM_{10}, and $PM_{2.5}$ and visibility-reducing particles are values that are not to be exceeded.

California air districts have based their thresholds of significance for California Environmental Quality Act (CEQA) purposes on the levels that scientific and factual data demonstrate that the air basin can accommodate without affecting the attainment date for the NAAQS or CAAQS. Since an ambient air quality standard is based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of the ambient air quality standard, this means that the thresholds established by air districts are also protective of human health. The NAAQS and CAAQS are presented in Table 4.3-1.

Table 4.3-1. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	Primary[c,d]	Secondary[c,e]
O_3	1 hour	0.09 ppm (180 µg/m³)	—	Same as primary standard[f]
	8 hours	0.070 ppm (137 µg/m³)	0.070 ppm (137 µg/m³)[f]	
NO_2[g]	1 hour	0.18 ppm (339 µg/m³)	0.100 ppm (188 µg/m³)	Same as primary standard
	Annual arithmetic mean	0.030 ppm (57 µg/m³)	0.053 ppm (100 µg/m³)	
CO	1 hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)	None
	8 hours	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)	
SO_2[h]	1 hour	0.25 ppm (655 µg/m³)	0.075 ppm (196 µg/m³)	—
	3 hours	—	—	0.5 ppm (1,300 µg/m³)
	24 hours	0.04 ppm (105 µg/m³)	0.14 ppm (for certain areas)[g]	—
	Annual	—	0.030 ppm (for certain areas)[g]	—
PM_{10}[i]	24 hours	50 µg/m³	150 µg/m³	Same as primary standard
	Annual arithmetic mean	20 µg/m³	—	
$PM_{2.5}$[i]	24 hours	—	35 µg/m³	Same as primary standard
	Annual arithmetic mean	12 µg/m³	9.0 µg/m³	15.0 µg/m³
Lead[j,k]	30-day average	1.5 µg/m³	—	—
	Calendar quarter	—	1.5 µg/m³ (for certain areas)[k]	Same as primary standard
	Rolling 3-month average	—	0.15 µg/m³	

Table 4.3-1. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	Primary[c,d]	Secondary[c,e]
Hydrogen sulfide	1 hour	0.03 ppm (42 µg/m³)	—	—
Vinyl chloride[j]	24 hours	0.01 ppm (26 µg/m³)	—	—
Sulfates	24 hours	25 µg/m³	—	—
Visibility-reducing particles	8 hours (10:00 a.m. to 6:00 p.m. PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to the number of particles when the relative humidity is less than 70%	—	—

Source: CARB 2024b.

Notes: O_3 = ozone; ppm = parts per million by volume; µg/m³ = micrograms per cubic meter; NO_2 = nitrogen dioxide; CO = carbon monoxide; mg/m³= milligrams per cubic meter; SO_2 = sulfur dioxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; PST = Pacific Standard Time.

[a] California standards for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, suspended particulate matter (PM_{10}, $PM_{2.5}$), and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[b] National standards (other than O_3, NO_2, SO_2, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once per year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than 1. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

[c] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[d] National primary standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

[e] National secondary standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[f] On October 1, 2015, the national 8-hour O_3 primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[g] To attain the national 1-hour standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb. California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards, the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[h] On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the national 1-hour standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

[l] On February 7, 2024, the national annual $PM_{2.5}$ primary standard was lowered from 12 µg/m³ to 9.0 µg/m³. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m³ were also retained. The form of the annual primary and secondary standards is the annual mean averaged over 3 years.

[j] CARB has identified lead and vinyl chloride as TACs with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[k] The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5-µg/m³ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

Local Ambient Air Quality

CARB, air districts, and other agencies monitor ambient air quality at approximately 250 air quality monitoring stations across the state. The SCAQMD monitors local ambient air quality in the vicinity of the Master Plan area. Air quality monitoring stations usually measure pollutant concentrations 10 feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations. The most recent background ambient air quality data from 2021 to 2023 are presented in Table 4.3-2. The Pomona monitoring station, located at 924 N. Garey Avenue, Pomona, is the air quality monitoring station nearest to the Master Plan area for ozone, NO_2, and CO, located approximately 3.2 miles east of the Master Plan area. The Downtown Los Angeles monitoring station, located at 1630 N Main Street, Los Angeles, is the air quality monitoring station nearest to the Master Plan area for SO_2.The Azusa monitoring station, located at 803 N. Loren Avenue, Azusa, is the air quality monitoring station nearest to the Master Plan area for PM_{10} and $PM_{2.5}$, located approximately 7.3 miles northwest of the proposed Master Plan area. The data collected at this station are considered representative of the air quality experienced in the proposed Master Plan area. The number of days exceeding the ambient air quality standards is also shown in Table 4.3-2.

Table 4.3-2. Local Ambient Air Quality Data

Averaging Time	Unit	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
				2021	2022	2023	2021	2022	2023
Ozone (O_3)[1]									
Maximum 1-hour concentration	ppm	California	0.12	0.120	0.131	0.147	27	28	38
Maximum 8-hour concentration	ppm	California	0.070	0.092	0.096	0.114	43	49	56
		National	0.070	0.092	0.096	0.113	41	46	56
Nitrogen Dioxide (NO_2) [1]									
Maximum 1-hour concentration	ppm	California	0.18	0.071	0.058	0.062	0	0	0
		National	0.100	0.071	0.058	0.062	0	0	0
Annual concentration	ppm	California	0.030	0.018	0.017	0.016	—	—	—
		National	0.053	0.018	0.017	0.017	—	—	—
Carbon Monoxide (CO) [1]									
Maximum 1-hour concentration	ppm	California	20	ND	ND	ND	ND	ND	ND
		National	35	1.7	1.6	1.5	0	0	0
Maximum 8-hour concentration	ppm	California	9.0	ND	ND	ND	ND	ND	ND
		National[3]	9	1.3	1.1	1.3	0	0	0
Sulfur Dioxide (SO_2) [2]									
Maximum 1-hour concentration	ppm	National	0.075	0.002	0.007	0.008	0	0	0
Maximum 24-hour concentration	ppm	National	0.14	0.001	0.001	0.003	0	0	0

Table 4.3-2. Local Ambient Air Quality Data

Averaging Time	Unit	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
				2021	2022	2023	2021	2022	2023
Annual concentration	ppm	National	0.030	0.0004	0.0003	0.0002	—	—	—
Coarse Particulate Matter (PM_{10})[3,4]									
Maximum 24-hour concentration	µg/m³	California	50	77.7	96.1	ND	0.0 (0)	ND (0)	ND (0)
		National	150	79.4	98.2	ND	65.7 (11)	ND (7)	ND (0)
Annual concentration	µg/m³	California	20	33.4	38.3	ND	—	—	—
Fine Particulate Matter ($PM_{2.5}$)[3,4]									
Maximum 24-hour concentration	µg/m³	National	35	61.9	18.4	ND	8.9 (3)	ND (0)	ND (0)
Annual concentration	µg/m³	California	12	12.0	ND	ND	—	—	—
		National	9.0	11.4	10.1	ND	—	—	—

Sources: CARB 2025h; EPA 2023a.

Notes: ppm = parts per million by volume; — = not available; µg/m³ = micrograms per cubic meter; ND = insufficient data available to determine the value.

Data taken from CARB iADAM (http://www.arb.ca.gov/adam) and EPA AirData (http://www.epa.gov/airdata/) represent the highest concentrations experienced over a given year.

Exceedances of national and California standards are only shown for O_3 and particulate matter. Daily exceedances for particulate matter are estimated days because PM_{10} and $PM_{2.5}$ are not monitored daily. All other criteria pollutants did not exceed national or California standards during the years shown. There is no national standard for 1-hour O_3, annual PM_{10}, or 24-hour SO_2, nor is there a California 24-hour standard for $PM_{2.5}$.

1 Pomona Monitoring Station data, located at 924 N. Garey Avenue, Pomona.

2 Downtown Los Angeles Monitoring Station data, located at 1630 N Main Street, Los Angeles.

3 Azusa Monitoring Station data, located at 803 N. Loren Avenue, Azusa.

4 Measurements of PM_{10} and $PM_{2.5}$ are usually collected every 6 days and every 1 to 3 days, respectively. Number of days exceeding the standards is a mathematical estimate of the number of days concentrations would have been greater than the level of the standard had each day been monitored. The numbers in parentheses are the measured number of samples that exceeded the standard.

South Coast Air Basin Attainment Designation

Pursuant to the 1990 federal Clean Air Act amendments, EPA classifies air basins (or portions thereof) as "attainment" or "nonattainment" for each criteria air pollutant based on whether the NAAQS have been achieved. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as "attainment" for that pollutant. If an area exceeds the standard, the area is classified as "nonattainment" for that pollutant. If there are not enough data available to determine whether the standard is exceeded in an area, the area is designated as "unclassified" or "unclassifiable." The designation of "unclassifiable/attainment" means that the area meets the standard or is expected to be meet the standard despite a lack of monitoring data. Areas that achieve the standards after a nonattainment designation are re-designated as maintenance areas and must have approved maintenance plans to ensure continued attainment of the standards. The California Clean Air Act, like its federal counterpart, called for the designation of areas as "attainment" or "nonattainment," but based on CAAQS

rather than the NAAQS. Table 4.3-3 depicts the current attainment status of the Los Angeles County portion of the SCAB with respect to the NAAQS and CAAQS.

Table 4.3-3. South Coast Air Basin Attainment Classification

Pollutant	Designation/Classification	
	National Standards	California Standards
Ozone (O_3), 1-hour	No national standard	**Nonattainment**
Ozone (O_3), 8-hour	**Extreme nonattainment**	**Nonattainment**
Nitrogen Dioxide (NO_2)	Attainment/maintenance	Attainment
Carbon Monoxide (CO)	Attainment/maintenance	Attainment
Sulfur Dioxide (SO_2)	Unclassifiable/attainment	Attainment
Coarse Particulate Matter (PM_{10})	Attainment/maintenance	**Nonattainment**
Fine Particulate Matter ($PM_{2.5}$)	**Serious nonattainment**	**Nonattainment**
Lead	**Nonattainment**[a]	Attainment
Hydrogen Sulfide	No national standard	Unclassified
Sulfates	No national standard	Attainment
Visibility-Reducing Particles	No national standard	Unclassified
Vinyl Chloride	No national standard	Unclassified

Sources: EPA 2023b (national); CARB 2025i (California).
Notes: Bold text = not in attainment; attainment = meets the standards; attainment/maintenance = achieves the standards after a nonattainment designation; nonattainment = does not meet the standards; unclassified or unclassifiable = insufficient data to classify; unclassifiable/attainment = meets the standard or is expected to meet the standard despite a lack of monitoring data.
[a] Partial Nonattainment designation – Los Angeles County portion of Basin only for near-source monitors.

In summary, the SCAB is designated as a nonattainment area for national and California O_3 standards and national and California $PM_{2.5}$ standards. The SCAB is designated as a nonattainment area for California PM_{10} standards; however, it is designated as an attainment area for national PM_{10} standards. The Los Angeles County portion of the SCAB is designated as an attainment area for national and California CO standards, national and California NO_2 standards, national and California lead standards, and national and California SO_2 standards (EPA 2023b; CARB 2025h).

Despite the current nonattainment status, air quality in the SCAB has generally improved since the inception of air pollutant monitoring in 1976. This improvement is mainly a result of lower-polluting on-road motor vehicles, more stringent regulation of industrial sources, and the implementation of emission reduction strategies by the SCAQMD. This trend toward cleaner air has occurred despite continued population growth. PM_{10} levels have declined almost 50% since 1990, and $PM_{2.5}$ levels have also declined 50% since measurements began in 1999 (SCAQMD 2013). Similar improvements are observed with O_3, although the rate of O_3 decline has slowed in recent years.

Toxic Air Contaminants

The state Air Toxics Program was established in 1983 under AB 1807, California Health and Safety Code Section 39650. The California TAC list identifies more than 200 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. In accordance with AB 2728, the state list includes the (federal) HAPs.

In 1987, the legislature enacted the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588), California Health and Safety Code Section 44360(b)(2), to address public concern over the release of TACs into the atmosphere. AB 2588 requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hotspots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years. TAC emissions from individual facilities are quantified and prioritized. "High-priority" facilities are required to perform a health risk assessment (HRA), and if specific thresholds are exceeded, the facility operator is required to communicate the results to the public in the form of notices and public meetings. As AB 2588 applies to facilities with permitted sources that emit TACs, such as aerospace industry manufacturers, hospitals, chemical plants, wastewater treatment plants, and oil and gas production facilities (SCAQMD 2023), rather than residential/mixed-use development, the proposed Master Plan would not include facilities subject to AB 2588 or be required to perform an operational HRA.

In 2000, CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines (CARB 2000). Additional regulations apply to new trucks and diesel fuel, including the On-Road Heavy-Duty Diesel Vehicle (In-Use) Regulation, the On-Road Heavy-Duty (New) Vehicle Program, the In-Use Off-Road Diesel Vehicle Regulation, and the New Off-Road Compression-Ignition (Diesel) Engines and Equipment program. These regulations and programs have timetables by which manufacturers must comply and existing operators must upgrade their diesel-powered equipment. CARB has adopted several Airborne Toxic Control Measures (ATCMs) that reduce diesel emissions, including the following:

- Diesel Particulate Matter Control Measure for On-Road Heavy-Duty Diesel-Fueled Residential and Commercial Solid Waste Collection Vehicles (13 CCR 2020, 13 CCR 2021)
- ATCM for Diesel Particulate Matter from Portable Engines Rated 50 horsepower and greater (17 CCR 93116)
- ATCM for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities where TRUs operate (13 CCR 2477 and Article 8)
- ATCM to limit diesel-fueled commercial motor vehicle idling (13 CCR 2485)
- ATCM for In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449 et seq.)
- ATCM for In-Use On-Road Diesel-Fueled Vehicles (13 CCR 2025)

California Health and Safety Code Section 41700

Section 41700 of the California Health and Safety Code states that a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or that endanger the comfort, repose, health, or safety of any of those persons or the public; or that cause, or have a natural tendency to cause, injury or damage to business or property. Section 41700 also applies to sources of objectionable odors.

Air Quality and Land Use Handbook

CARB published the Air Quality and Land Use Handbook in 2005 to provide important air quality information about certain types of facilities (e.g., freeways, refineries, distribution centers) that should be considered when siting sensitive land uses such as residences. CARB provides recommended siting distances from certain types of facilities when locating new sensitive land uses. The recommendations are advisory and should not be interpreted as defined "buffer zones." If a project is within the siting distance, CARB recommends further analysis. Where possible, CARB recommends a minimum separation between new sensitive land uses and existing sources.

4.3.2.3 Local

As a state entity, Cal Poly Pomona is not subject to local government permitting or regulations, policies, or ordinances, such as the general plans and ordinances for the City of Pomona, City of Walnut, or the County of Los Angeles. Because Cal Poly Pomona is not subject to local general plans or other local land use plans and/or ordinances, these regulations are not summarized here or further analyzed in this section. However, information about regional agencies responsible for the regulation and enforcement of federal, state, and local air pollution control regulations in the SCAB and related regional planning is provided below.

South Coast Air Quality Management District

While CARB is responsible for the regulation of mobile emissions sources within the state, local air quality management districts and air pollution control districts are responsible for enforcing standards and regulating stationary sources. The SCAQMD is the regional agency responsible for the regulation and enforcement of federal, state, and local air pollution control regulations in the SCAB, where the Master Plan area is located. SCAQMD operates monitoring stations in the SCAB, develops rules and regulations for stationary sources and equipment, prepares emissions inventory and air quality management planning documents, and conducts source testing and inspections. The SCAQMD's AQMPs include control measures and strategies to be implemented to attain the CAAQS and NAAQS in the SCAB. SCAQMD then implements these control measures as regulations to control or reduce criteria pollutant emissions from stationary sources or equipment.

Air Quality Management Plan

The most recently adopted AQMP is the 2022 AQMP (SCAQMD 2022), which was adopted by the SCAQMD governing board on December 2, 2022. The 2022 AQMP is a regional blueprint for achieving air quality standards and healthful air. The 2022 AQMP was developed to address the requirements for meeting EPA's NAAQS for ground-level O_3. The strategies of the 2022 AQMP include wide adoption of zero-emissions technologies, low-NO_x technologies where zero-emission technologies are not feasible, federal action, zero-emission technologies for residential and industrial sources, incentive funding in environmental justice areas, and prioritizing benefits on the most disadvantaged communities (SCAQMD 2022).

Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning

The SCAQMD adopted its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in May 2005. Like the CARB Land Use Handbook, the SCAQMD Guidance Document provides recommendations for the siting of new sensitive land uses near potential sources of toxic air emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, gas dispensing facilities). In its Guidance Document the SCAQMD provides recommendations for when an HRA should be prepared, such as for truck stops and warehouse distribution facilities, where more than 100 trucks per day or more than 40 trucks with truck refrigeration units are generated.

Applicable Rules

Emissions that would result from proposed Master Plan development may be subject to SCAQMD rules and regulations, which may include the following:

Rule 401 – Visible Emissions. This rule establishes the limit for visible emissions from stationary sources for a period or periods aggregating more than 3 minutes in any hour. This rule prohibits visible emissions dark or darker than Ringelmann No. 1 for periods greater than 3 minutes in any hour or such opacity that could obscure an observer's view to a degree equal or greater than does smoke.

Rule 402 – Nuisance. This rule prohibits the discharge of air pollutants from a facility that causes injury, detriment, nuisance, or annoyance to the public or damage to business or property.

Rule 403 – Fugitive Dust. This rule requires fugitive dust sources to implement best available control measures for all sources and prohibits all forms of visible particulate matter from crossing any property line. SCAQMD Rule 403 is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust.

Rule 431.2 – Sulfur Content of Liquid Fuels. The purpose of this rule is to limit the sulfur content in diesel and other liquid fuels for the purpose both of reducing the formation of SO_x and particulates during combustion and of enabling the use of add-on control devices for diesel-fueled internal combustion engines. The rule applies to all refiners, importers, and other fuel suppliers such as distributors, marketers, and retailers, as well as to users of diesel, low-sulfur diesel, and other liquid fuels for stationary-source applications in the SCAQMD. The rule also affects diesel fuel supplied for mobile source applications.

Rule 445 – Wood-Burning Devices. The purpose of this rule is to reduce the emission of particulate matter from wood-burning devices and establish contingency measures for applicable O_3 standards for the reduction of VOCs. The rule requires the installation of only gaseous-fueled fireplaces and stoves in any new residential or commercial development.

Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines. This rule applies to stationary and portable engines rated at greater than 50 horsepower. The purpose of Rule 1110.2 is to reduce NO_x, VOCs, and CO emissions from engines. Emergency engines, including those powering standby generators, are generally exempt from the emissions and monitoring requirements of this rule because they have permit conditions that limit operation to 200 hours or less per year as determined by an elapsed operating time meter.

Rule 1113 – Architectural Coatings. This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Rule 1138 – Control of Emissions from Restaurant Operations. This rule specifies PM and VOC emissions and odor control requirements for commercial cooking operations that use chain-driven char broilers to cook meat.

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. This rule requires specific work requirements to limit asbestos emissions from building demolition and renovation activities. The requirements for demolition and renovation activities include asbestos surveying, notification, removal procedures and time schedules, handling and clean up procedures and storage, disposal and landfilling requirements for asbestos-containing waste materials.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SCAG serves as the federally designated metropolitan planning organization for the Southern California region and is the largest metropolitan planning organization in the United States.

The RTP/SCS is updated every 4 years. SCAG adopted the 2024-2050 RTP/SCS, also referred to as "Connect SoCal 2024." The Connect SoCal 2024-2050 builds upon prior planning cycles to update the vision of the region's future (SCAG 2024). SCAG's Connect SoCal 2024–2050 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS is a regional growth management strategy, which targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region pursuant to SB 375. In addition to demonstrating the region's ability to attain the GHG emission reduction targets set forth by CARB, the 2024–2050 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands (SCAG 2024). Thus, successful implementation of the 2024–2050 RTP/SCS would result in more complete communities with various transportation and housing choices while reducing automobile use.

As stated above, the SCAQMD adopted the 2022 AQMP, which incorporates the regional growth projections from the previous RTP/SCS, Connect SoCal 2020 (SCAG 2020; SCAQMD 2022).

4.3.3 Thresholds of Significance and Methodology

4.3.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section15064.7). The significance criteria used to evaluate the proposed Master Plan's impacts to air quality are based on CEQA Guidelines Appendix G. For the purposes of the proposed Master Plan, a potentially significant impact to air quality would occur if the proposed Master Plan would:

1. Conflict with or obstruct implementation of the applicable air quality plan.
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
3. Expose sensitive receptors to substantial pollutant concentrations.
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Appendix G indicates that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to determine whether the proposed Master Plan would have a significant impact on air quality.

The SCAQMD has established Air Quality Significance Thresholds, as revised in March 2023, that set forth quantitative emission significance thresholds below which a project would not have a significant impact on ambient air quality (SCAQMD 2023). The proposed Master Plan's "regional" emission refers to emissions that will be evaluated based on regional significance thresholds established by the SCAQMD, also known as the criteria pollutant mass daily thresholds. The SCAQMD Air Quality Significance Thresholds also provide TACs thresholds and ambient air quality standards for criteria pollutants which are to be utilized for localized significance determination. The quantitative air quality analysis provided herein applies the SCAQMD thresholds identified in Table 4.3-4 to determine the potential for the proposed Master Plan to result in a significant impact under CEQA.

Table 4.3-4. SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds – Regional Thresholds		
Pollutant	**Construction (pounds per day)**	**Operation (pounds per day)**
VOCs	75	55
NO_x	100	55
CO	550	550
SO_x	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55
Lead[a]	3	3
TACs and Odor Thresholds – Localized Thresholds		
TACs[b]	Maximum incremental cancer risk ≥10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥1 in 1 million) Chronic and acute hazard index ≥1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality Standards for Criteria Pollutants[c] – Localized Thresholds		
NO_2 1-hour average NO_2 annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: ▪ 0.18 ppm (state) ▪ 0.030 ppm (state) and 0.0534 ppm (federal)	
CO 1-hour average CO 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: ▪ 20 ppm (state) and 35 ppm (federal) ▪ 9.0 ppm (state/federal)	
PM_{10} 24-hour average PM_{10} annual average	10.4 μg/m³ (construction)[d] 2.5 μg/m³ (operation) 1.0 μg/m³	
$PM_{2.5}$ 24-hour average	10.4 μg/m³ (construction)[d] 2.5 μg/m³ (operation)	

Source: SCAQMD 2023.
Notes: SCAQMD = South Coast Air Quality Management District; VOC = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; TAC = toxic air contaminant; NO_2 = nitrogen dioxide; ppm = parts per million by volume; μg/m³ = micrograms per cubic meter.

Greenhouse gas emissions thresholds for industrial projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not include provided in this table as they are addressed within the greenhouse gas emissions analysis and not the air quality analysis.

[a] The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the proposed Master Plan is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

[b] TACs include carcinogens and noncarcinogens.

[c] Ambient air quality standards for criteria pollutants are based on SCAQMD Rule 1303, Table A-2, unless otherwise stated.

[d] Ambient air quality thresholds are based on SCAQMD Rule 403.

The phasing out of leaded gasoline started in 1976. As gasoline no longer contains lead, the proposed Master Plan is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

The evaluation of whether the proposed Master Plan would conflict with or obstruct implementation of the applicable air quality plan (CEQA Guidelines, Appendix G, Threshold 1) is based on the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993), Chapter 12, Sections 12.2 and 12.3. The first criterion assesses whether the proposed Master Plan would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP, which is addressed in detail under Section 4.3.4, Impacts Analysis, Threshold 1. The second criterion is whether the proposed Master Plan would exceed the assumptions in the AQMP, or increments based on the year of proposed Master Plan buildout and phase, as discussed further in Threshold 2.

To evaluate the potential for the proposed Master Plan to result in a cumulatively considerable net increase of any criteria pollutant for which the proposed Master Plan region is nonattainment under an applicable federal or state ambient air quality standard (CEQA Guidelines, Appendix G, Threshold 2), this analysis applies SCAQMD's construction and operational criteria pollutants mass daily thresholds, as shown in Table 4.3-4. A project would potentially result in a cumulatively considerable net increase in O_3, which is a nonattainment pollutant in the air basin, if the project's construction or operational emissions would exceed the SCAQMD VOC or NO_x thresholds shown in Table 4.3-4. These emissions-based thresholds for O_3 precursors are intended to serve as a surrogate for an "ozone significance threshold" (i.e., the potential for adverse O_3 impacts to occur). This approach is used because O_3 is not emitted directly, and the effects of an individual project's emissions of O_3 precursors (VOC and NO_x) on O_3 levels in ambient air cannot be determined reliably or meaningfully through air quality models or other quantitative methods.

The assessment of the proposed Master Plan's potential to expose sensitive receptors to substantial pollutant concentrations (CEQA Guidelines, Appendix G, Threshold 3) includes a localized significance threshold (LST) analysis, as recommended by the SCAQMD, to evaluate the potential of localized air quality impacts to sensitive receptors in the immediate vicinity of a proposed project from construction and operation; however, an operational LST analysis is not required for the proposed Master Plan due to it not proposing substantial on-site sources of localized emissions.

For project sites that disturb 5 acres or less, the SCAQMD LST Methodology includes lookup tables that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance criteria (i.e., the emissions would not cause an exceedance of the applicable concentration limits for NO_2, CO, PM_{10}, and $PM_{2.5}$) without performing project-specific dispersion modeling (SCAQMD 2009). For projects that exceed 5 acres, such as the proposed Master Plan, the maximum number of acres disturbed on the peak day was estimated using the Fact Sheet for Applying CalEEMod to Localized Significance Thresholds (SCAQMD 2011), which provides estimated acres per 8-hour day for crawler tractors, graders, rubber-tired dozers, and scrapers. Based on the SCAQMD guidance, and scaling the area based on anticipated equipment usage per day, it was estimated that the maximum number

of acres on the Master Plan area that would be disturbed by off-road equipment would be four acres per day. Therefore, the LST look up values can be used to determine localized significance.

The LST significance thresholds for NO_2 and CO represent the allowable increase in concentrations above background levels in the vicinity of a project that would not cause or contribute to an exceedance of the relevant ambient air quality standards, while the threshold for PM_{10} represents compliance with Rule 403 (Fugitive Dust). The LST significance threshold for $PM_{2.5}$ is intended to ensure that construction emissions do not contribute substantially to existing exceedances of the $PM_{2.5}$ ambient air quality standards. The allowable emission rates depend on the following parameters:

1. Source Receptor Area in which the project is located
2. Size of the project site
3. Distance between the project site and the nearest sensitive receptor (e.g., residences, schools, hospitals)

The Master Plan area is located in Source Receptor Area 10 (Claremont). LST pollutant screening level concentration data is currently published for 1-, 2-, and 5-acre sites for varying distances (25, 50, 100, 200, and 500 meters [approximately 82, 164, 328, and 1,640 feet]).

As stated above, the nearest sensitive receptor land uses are existing on-site residences located within the Master Plan area's boundaries. As the Master Plan area is adjacent to these sensitive receptor land uses, the minimum distance recommended is 25 meters, per LST methodology (SCAQMD 2009). The residential uses represent the nearest land uses to the Master Plan area where an individual could remain for 24 hours. The nearest residential land use has been used to determine construction air quality impacts for emissions of PM_{10} and $PM_{2.5}$, since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time. Because the proposed Master Plan is not anticipated to include substantial on-site sources of pollutants during operation (e.g., operational stationary sources), an operational LST analysis is not applicable.

The LST methodology does not include commercial and industrial facilities in the definition of sensitive receptors because employees and customers do not typically remain on site for a full 24 hours but are typically on site for 8 hours or less. The LST methodology provides that LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, may be applied to receptors such as industrial or commercial facilities since a worker at these sites could be present for periods of 1 to 8 hours (SCAQMD 2009). For this analysis, if an industrial/commercial use is located at a closer distance to the Master Plan area than the nearest residential use, the nearest industrial/commercial use will be used to determine construction LST impacts for NO_2 and CO because that individual could be present at those sites for periods of 1 to 8 hours. However, as the nearest residential use is adjacent to the site, the minimum threshold for distance (i.e., 25 meters) is used for NO_2 and CO (SCAQMD 2009).

The LST values from the SCAQMD lookup tables for Source Receptor Area 10 (Claremont) for a 4-acre project site and a receptor distance of 25 meters for PM_{10}, $PM_{2.5}$, NO_2, and CO are shown in Table 4.3-5.

Table 4.3-5. Construction Localized Significance Thresholds for Source Receptor Area 10 (Claremont)

Pollutant	Threshold (pounds per day)
NO_2	207
CO	1,339
PM_{10}	10
$PM_{2.5}$	6

Source: SCAQMD 2009.
Notes: NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter.
Localized significance thresholds were determined based on the values for a 2-acre site at a distance of 25 meters from the nearest sensitive residential receptor.

The assessment of the proposed Master Plan's potential to expose sensitive receptors to substantial pollutant concentrations (CEQA Guidelines, Appendix G, Threshold 3) also includes a qualitative CO hotspot analysis based on comparison to the SCAQMD 2003 AQMP CO hotspot analysis.

The potential for the proposed Master Plan to result in other emissions, specifically an odor impact (CEQA Guidelines, Appendix G, Threshold 4), is based on the proposed Master Plan's anticipated construction activity, land use types, and the potential for the proposed Master Plan to create an odor nuisance pursuant to SCAQMD Rule 402.

4.3.3.2 Methodology

Construction Emissions

Emissions from the construction phase of the proposed Master Plan, including the near-term development components, were estimated using California Emissions Estimator Model (CalEEMod) Version 2022.1 CalEEMod utilizes widely accepted methodologies for estimating emissions combined with default data that can be used when site-specific information is not available. Sources of these methodologies and default data include but are not limited to the EPA AP-42 emission factors, CARB vehicle emission models, and studies commissioned by California agencies such as the California Energy Commission and CalRecycle. Construction modeling parameters, including phasing, equipment mix, and vehicle trips, were based on CalEEMod default values and specific construction equipment mix information for typical individual Master Plan projects as provided by Cal Poly Pomona.

For purposes of estimating construction emissions for the proposed Master Plan, including the near-term development components, it was estimated that up to approximately 1.1 million gross square feet (GSF) of building space would be under construction/renovation in 5 years. This estimate was developed based on review of the proposed Master Plan, and the near-term development components as discussed in Section 3.7.

CalEEMod default parameters were used to estimate construction emissions. Notably, because California's construction-related emission sources are regulated, proposed Master Plan construction emissions are reasonably expected to continue to decline as Tier 4 construction equipment[3] becomes more widely available. Thus, by utilizing the earliest possible start date, the proposed Master Plan's estimated emissions likely overstate actual emission

[3] Tier 4 refers to the emission standards established by the EPA and CARB which are applicable to new engines found in off-road equipment including construction, mining and agricultural equipment, marine vessels and workboats, locomotives and stationary engines found in industrial and power generation applications. As of January 1, 2014, these emissions standards apply to new engines that power equipment commonly found in most construction and agricultural applications. Tier 4 compliant engines significantly reduce PM and NO_x emissions. Compared to previous emissions standards, Tier 4 compliant engines reduce emissions by over 95% for most construction equipment.

levels. Therefore, the analysis and modeling provided herein provides an accurate and conservative assessment of the proposed Master Plan's construction-related air pollutant emissions.

While construction specifics and phasing for buildout of the proposed Master Plan, including the near-term development components, are not currently available, the emissions generated from construction/renovation associated with a maximum scenario of 1.1 million GSF of buildings over 5 years were determined to provide a conservative basis for the evaluation of construction activities potentially occurring simultaneously on the campus under the proposed Master Plan over 15 years (2040). The analysis contained herein is based on the following modeling parameters for the representative construction scenario (duration of phases is approximate):

- Demolition: 9 months
- Site Preparation: 1 month
- Grading: 2 months
- Building Construction: 4 years
- Paving: 1.8 years
- Application of Architectural Coatings: 1.8 years

To capture haul trips from demolition, it was assumed that the construction scenario would involve the demolition of the Engineering Art Annex Building (Building 13 and 13A), based on information provided by Cal Poly Pomona and considering the types of features present on some of the near-term development component sites. Grading quantities are currently not identified, and grading is anticipated to be minimal because the site is already developed; therefore, construction sites would be balanced and not require substantial import or export of soil.

Construction worker and vendor truck trips by construction phase were based on CalEEMod default values. CalEEMod default trip length values were used for the distances for all construction-related trips.

The construction equipment mix and vehicle trips used for estimating the proposed Master Plan-generated construction emissions are shown in Table 4.3-6. For the analysis, it was estimated that heavy construction equipment would be operating at the site 5 days per week (22 days per month) during proposed Master Plan construction. Specific CalEEMod parameters for each model scenario, including quantity of equipment, are provided in Appendix B.

Table 4.3-6. Construction- Related Modeling Inputs

Construction Phase	Average Daily One-Way Vehicle Trips			Equipment		
	Worker	Vendor	Haul Trucks	Equipment Type	Quantity	Hours Per Day
Demolition	16	4	48	Rubber-Tired Dozers	2	8
				Excavators	3	8
				Concrete/Industrial Saws	1	8
Site Preparation	18	4	0	Rubber-Tired Dozers	3	8
				Tractors/Loaders/Backhoes	4	8
Grading	20	4	0	Graders	1	8
				Excavators	2	8
				Tractors/Loaders/Backhoes	2	8
				Scrapers	2	8
				Rubber-Tired Dozers	1	8
Building Construction	478	186	0	Forklifts	9	8
				Generator sets	3	8
				Cranes	2	8
				Welders	3	8
				Tractor/Loaders/Backhoes	9	8
Paving	96	4	0	Pavers	2	8
				Paving Equipment	2	8
				Rollers	2	8
Architectural Coating	96	4	0	Compressor	2	8

Note: See Appendix B for details.

Operational Emissions

Emissions from the operational phase of the proposed Master Plan, including all proposed development described in Chapter 3, Project Description, which includes the near-term development components, were estimated using CalEEMod Version 2022.1 based on an operational year 2040, the estimated planning horizon for the proposed Master Plan. Operational air quality emissions were estimated for area sources (consumer product use, architectural coatings, and landscape maintenance equipment), energy sources (natural gas), and mobile sources, as further described below.

Mobile Sources

Mobile sources for the proposed Master Plan would primarily be motor vehicles (automobiles and light-duty trucks) traveling to and from the campus. Motor vehicles may be fueled with gasoline, diesel, or alternative fuels. The default vehicle mix provided in CalEEMod 2022.1, which is based on CARB's Mobile Source Emissions Inventory model, EMFAC, version 2021, was applied for both existing and proposed Master Plan conditions.

Trip generation rates for existing and proposed Master Plan conditions were based on the Transportation Analysis prepared for the proposed Master Plan (see Section 4.17, Transportation). Default vehicle trip generation rates

provided in CalEEMod for each of the analyzed land uses were adjusted to match the existing campus and the proposed Master Plan's trip generation estimates from the Transportation Analysis. In addition, Saturday and Sunday trip rates for both the existing campus and the proposed Master Plan were adjusted in proportion to the CalEEMod weekday trip rates because weekend trip generation rates were not provided in the Transportation Analysis. Other CalEEMod default data, including temperature, trip characteristics, variable start information, and emissions factors were conservatively used for the model inputs. Proposed Master Plan-related traffic includes a mix of vehicles in accordance with the model defaults. Emission factors representing the vehicle mix and emissions for 2040 (the first full year of operation) were used to estimate emissions associated with the proposed Master Plan.

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape maintenance equipment. Emissions associated with natural gas usage in space heating, water heating, and stoves are calculated in the building energy use module of CalEEMod, as described in the following text. The existing and proposed Master Plan conditions would not include woodstoves or fireplaces (wood or natural gas). As such, area source emissions associated with hearths were not included.

Consumer products are chemically formulated products used by household and institutional consumers, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Other paint products, furniture coatings, or architectural coatings are not considered consumer products (CAPCOA 2021). Consumer product VOC (i.e., ROG) emissions are estimated in CalEEMod based on the floor area of nonresidential (main campus facilities) and residential (student and faculty housing) buildings and on the default factor of pounds of VOC per building square foot per day. For the asphalt surface land use considered in the proposed Master Plan scenario, CalEEMod estimates VOC emissions associated with use of parking surface degreasers based on a square footage of parking surface area and pounds of VOC per square foot per day.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers used during building maintenance. CalEEMod calculates the VOC evaporative emissions from application of residential and nonresidential surface coatings based on the VOC emission factor, the building square footage, the estimated fraction of surface area, and the reapplication rate. The VOC emission factor is based on the VOC content of the surface coatings, and MBARD Rule 426, which restricts the VOC content for interior and exterior coatings. The model default reapplication rate of 10% of area per year is used. Consistent with CalEEMod defaults, the nonresidential surface area for painting equals 2.0 times the floor square footage, with 75% coverage for interior coating and 25% coverage for exterior surface coating and the residential surface area for painting equals 2.7 times the floor square footage, with 75% assumed for interior coating and 25% assumed for exterior surface coating. For the other asphalt surfaces considered in the proposed Master Plan scenario, the architectural coating area is 6% of the total square footage, consistent with the supporting CalEEMod studies provided as an appendix to the CalEEMod User's Guide (CAPCOA 2021).

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers. The emissions associated from landscape equipment use are estimated based on CalEEMod default values for emission factors (grams per residential dwelling unit per day and grams per square foot of nonresidential building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days.

Energy Sources

As represented in CalEEMod, energy sources include emissions associated with building electricity and natural gas usage. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for greenhouse gas emissions in CalEEMod, since criteria pollutant emissions occur at the site of the power plant, which is typically off site.

Stationary Sources

The proposed Master Plan would install an emergency diesel generator (500 horsepower) for emergency safety systems during a power outage in the proposed Student Housing Replacement Project (Phase III). It is anticipated that regular testing and maintenance of the emergency generator would require an hour of operation each week. CalEEMod was used to estimate criteria air pollutant emissions of the generator assuming 1 hour per week and 52 hours per year for maintenance and testing.

Project Design Features

In addition, as stated in Chapter 3, Project Description, the following Project Design Features (PDFs) are part of the proposed Master Plan and included in the analytical assumptions for purposes of impact determinations (see Chapter 3, Project Description for the specific text of each applicable PDF). The PDFs will be incorporated into the Master Plan's Mitigation Monitoring and Reporting Program that will be adopted by the CSU Board of Trustees when they consider approval of the proposed Master Plan:

- PDF-AQ-1: Use of zero-emission or CARB Tier 4 Final-compliant engines for off-road diesel-fueled construction equipment.
- PDF-AQ-2: Use of zero-emission or CARB Tier 4 Final-compliant engines for diesel-fueled operational equipment.

4.3.4 Impact Analysis

4.3.4.1 Project Impacts

Impact 4.3-1 The project would not conflict with or obstruct implementation of the applicable air quality plan. (Less than Significant)

Program-Level Analysis for the Master Plan

As previously discussed, the proposed Master Plan is located within the SCAB under the jurisdiction of the SCAQMD, which is the local agency responsible for administration and enforcement of air quality regulations for the area. The SCAQMD has established criteria for determining consistency with the AQMP, currently the 2022 AQMP, in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993). The criteria are as follows (SCAQMD 1993):

- **Consistency Criterion No. 1:** The project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2:** The project will not exceed the assumptions in the AQMP, or increments based on the year of project buildout and phase.

Consistency Criterion No. 1

Impact 4.3-2, below, applies the SCAQMD mass daily construction and operational thresholds to evaluate the proposed Master Plan's potential impacts with regard to a cumulatively considerable net increase of a nonattainment criteria pollutant, as well as the potential for the proposed Master Plan to result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations (Consistency Criterion No. 1).

As discussed below, emissions resulting from proposed Master Plan construction alone would not exceed the criteria pollutant thresholds established by the SCAQMD for all criteria air pollutants. Therefore, the proposed Master Plan would not have the potential to increase the frequency or severity of a violation in the federal or state ambient air quality standards. Thus, the proposed Master Plan would not conflict with Consistency Criterion No. 1 of the SCAQMD Air Quality Management Handbook.

Consistency Criterion No. 2

The 2022 AQMP accommodates planned growth in the SCAB. Projects are considered consistent with, and would not conflict with or obstruct implementation of, the 2022 AQMP if the growth in socioeconomic factors (e.g., population, employment) is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of SCAQMD 1993).

The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the SCAG for its RTP/SCS (SCAG 2020), which is based on general plans for cities and counties in the SCAB, for the development of the AQMP emissions inventory (SCAQMD 2022).[4] The SCAG 2020–2045 RTP/SCS (Connect SoCal) and associated Regional Growth Forecast are generally consistent with the local plans; therefore, the 2022 AQMP is generally consistent with local government plans. As discussed in Section 4.14 Population and Housing, the proposed Master Plan growth is accommodated by the growth forecast that was used to develop the Connect SoCal and thus the 2022 AQMP, the Master Plan would not exceed growth projections incorporated into the AQMP (SCAG 2024).

The proposed Master Plan would not conflict with Consistency Criterion No. 1 and Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook and impacts would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Consistency Criterion No. 1

As discussed in Threshold 2 below, emissions resulting from near-term construction would not exceed the criteria pollutant thresholds established by the SCAQMD for all criteria air pollutants. Therefore, the near-term projects would not have the potential to increase the frequency or severity of a violation in the federal or state ambient air

[4] Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including CARB, the California Department of Transportation, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into their Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in its 2020–2045 RTP/SCS are integrated in the 2022 AQMP (SCAQMD 2022).

quality standards. The near-term projects would not conflict with Consistency Criterion No. 1 of the SCAQMD Air Quality Management Handbook.

Consistency Criterion No. 2

The near-term projects would accommodate the needs of the current student, faculty, and staff campus populations as well as projected student enrollment and campus population growth. This enrollment and campus population growth is identified above under the program-level analysis. As discussed in Section 4.14 Population and Housing, the net increase in campus population is accommodated by the growth forecast that was used to develop Connect SoCal. Therefore, the near-term projects would not result in substantial population growth and would not exceed the Connect SoCal growth forecast.

The near-term projects would not conflict with Consistency Criterion No. 1 and Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook and impacts would be **less than significant**.

Impact 4.3-2 The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. (Less than Significant)

Program-Level Analysis for the Master Plan

Construction Emissions

Construction of the proposed Master Plan is anticipated to occur through 2040 and would result in the addition of pollutants to the local airshed caused by on-site mobile and stationary sources (i.e., off-road construction equipment, soil disturbance, and building material and coating off-gassing) and off-site mobile sources (i.e., on-road haul trucks and worker vehicle trips).[5] Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather condition. Therefore, such emission levels can only be approximately estimated.

For purposes of estimating proposed Master Plan emissions, default phasing parameters were used which were derived from CalEEMod because the proposed Master Plan details for construction of future development under the Master Plan are not yet available. Notably, the models do not need to use the exact commencement and completion dates to accurately represent the proposed Master Plan construction emissions. Assuming an earlier start date to estimate construction emissions would be conservative, because state and local regulations, and restrictions become more stringent over time. Thus, emissions impacts are likely to be overstated and emissions would likely decrease compared to the parameters used in the analysis over buildout of the proposed Master Plan. Therefore, the analysis and modeling provided herein provide a conservative assessment of the proposed Master Plan's construction-related air pollutant emissions.

Fugitive dust would result in PM_{10} and $PM_{2.5}$ emissions. Internal combustion engines used by construction equipment, haul trucks, and worker vehicles would result in emissions of VOC, NO_x, CO, PM_{10}, and $PM_{2.5}$. The

[5] As discussed in Section 4.3.3.2, for purposes of estimating construction emissions for the Master Plan, including the near-term development components, it was estimated that up to approximately 1.1 million GSF of building space would be under construction/renovation in five years. Therefore, the analysis and modeling provided herein provides a conservative basis for the evaluation of construction activities potentially occurring simultaneously on the campus under the Master Plan over 15 years (2040).

application of architectural coatings, such as exterior application/interior paint and other finishes, and application of asphalt pavement would also produce VOC emissions.

Table 4.3-7 presents the estimated maximum daily construction emissions generated during construction. Details of the emission calculations are provided in Appendix B.

Table 4.3-7 Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Construction Year	VOCs	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
2026	5.61	54.34	65.67	0.12	27.34	13.06
2027	4.64	33.73	67.70	0.10	8.76	2.76
2028	26.64	39.96	78.22	0.12	10.39	3.26
2029	26.50	38.39	80.81	0.12	10.30	3.18
2030	26.28	37.23	74.23	0.11	10.24	3.12
Maximum daily emissions	**26.64**	**54.34**	**80.81**	**0.12**	**27.34**	**13.06**
SCAQMD threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Appendix B.
Notes: VOC = Volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD= South Coast Air Quality Management District.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.

As shown in Table 4.3-7, maximum daily construction emissions associated with the proposed Master Plan would not exceed the SCAQMD significance thresholds for VOCs, NO_x, CO, PM_{10} or $PM_{2.5}$.[6] As such, proposed Master Plan impacts associated with construction emissions would be **less than significant**.

Operational Emissions

As described in Operational Emissions in Section 4.3.3.2 Methodology, proposed Master Plan-related operational sources of air pollutant emissions would include natural gas combustion, on-road vehicles, area sources (i.e., use of consumer products, architectural coatings for repainting, and landscaping equipment) and stationary sources (an emergency generator). Table 4.3-8 presents the estimated maximum daily operational emissions generated during the first full year of Master Plan operations after buildout (year 2040). The estimated existing campus emissions in 2024 were subtracted from the emissions attributable to Master Plan-related campus development (both new development and redevelopment) and existing campus development that would remain with proposed Master Plan implementation, and the net change in emissions is compared with the SCAQMD significance thresholds. As indicated in Section 4.3.3.2, proposed Master Plan emissions include all proposed development described in Chapter 3, Project Description. Details of the emission calculations are provided in Appendix B.

6 As discussed in Section 4.3.3.2, for purposes of estimating construction emissions for the Master Plan a reasonable worst-case scenario of construction activity (1.1 million GSF of building construction/renovation) was assumed to occur within five years. This represents a maximum amount of potential that may occur under implementation of the Master Plan. Because the SCAQMD's thresholds are based on daily emission maximums modeling future construction years (2031-2040) would not be necessary to evaluate the Master Plan's air quality impacts related to construction.

Table 4.3-8 Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NOx	CO	SOx	PM10	PM2.5
	Pounds per Day					
Existing Conditions (2024)						
Motor vehicles	161.79	133.91	1,545.63	3.52	317.93	82.28
Area	194.63	3.98	432.26	0.02	0.49	0.37
Energy	4.20	75.71	59.03	0.46	5.81	5.81
Total existing emissions	**360.62**	**213.61**	**2,036.93**	**4.00**	**324.22**	**88.45**
Master Plan Buildout (2040)						
Motor vehicles	120.24	80.52	1,159.46	3.32	367.14	94.18
Area	213.28	4.54	512.53	0.03	0.52	0.40
Energy	4.58	82.38	63.26	0.50	6.33	6.33
Stationary	0.82	0.04	2.09	<0.01	0.02	0.02
Total Master Plan emissions	**338.92**	**167.48**	**1,737.34**	**3.85**	**374.01**	**100.93**
Net emissions (Master Plan minus existing emissions)	**-21.70**	**-46.13**	**-299.59**	**-0.15**	**49.79**	**12.48**
Net emissions + construction emissions[1]	**4.94**	**8.21**	**-218.78**	**-0.03**	**77.13**	**25.54**
SCAQMD threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: See Appendix B for complete results.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
1 Per SCAQMD guidance on similar projects, when there is potential for construction activity and operation of a project to overlap, construction emissions should be added to operational emissions and evaluated against the SCAQMD's operational criteria air pollutant thresholds. To provide a conservative evaluation, peak daily construction emissions from the construction scenario were added to the buildout of the proposed Master Plan in 2040.

As shown in Table 4.3-8, the net daily operational emissions for the proposed Master Plan would not exceed the SCAQMD significance thresholds for VOCs, NO_x, CO, PM_{10}, or $PM_{2.5}$. As such, proposed Master Plan operational impacts would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Construction Emissions

Construction activities associated with the proposed individual near-term projects would result in air quality impacts similar to those described above at the program-level for implementation of the proposed Master Plan. Emissions from the construction phase of all near-term projects were calculated using CalEEMod. The evaluation of the potential criteria pollutant emissions related to implementation of the proposed Master Plan in the program-level analysis above determined that the impact would be less than significant. As such, the

near-term projects are accounted for in the modeling and therefore the construction impact related to criteria pollutant emissions would likewise be **less than significant**.

Operational Emissions

As shown in Table 4.3-8 above for the program-level analysis, the daily operational emissions from implementation of the proposed Master Plan would not exceed the SCAQMD significance thresholds for criteria air pollutant emissions. Given that each near-term project is captured within the program-level analysis presented in Table 4.3-8, operational emissions of criteria air pollutants for each near-term project would be less than the total emissions, and therefore, would not exceed the SCAQMD significance thresholds. As such, operational impacts of the near-term projects would be **less than significant**.

Impact 4.3-3 The project would not expose sensitive receptors to substantial pollutant concentrations. (Less than Significant)

Program-Level Analysis for the Master Plan

Localized Significance Thresholds

As discussed in Section 4.3.1, Environmental Setting, sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993).

An LST analysis has been prepared to determine potential impacts to nearby sensitive receptors during proposed Master Plan construction. As indicated in the discussion of the thresholds of significance (Section 4.3.3.1, Thresholds of Significance), SCAQMD also recommends the evaluation of localized NO_2, CO, PM_{10}, and $PM_{2.5}$ impacts as a result of construction activities to sensitive receptors in the immediate vicinity of the proposed Master Plan area. The impacts were analyzed using methods consistent with those in SCAQMD's Final LST Methodology (2008). According to the Final LST Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2008).

Construction activities would result in temporary sources of on-site fugitive dust and construction equipment emissions. To account for on-site operation of vendor trucks, haul trucks, and worker vehicle trips a distance of 1,000 feet of on-site vehicle operation was provided in the LST analysis. The LST values from the SCAQMD lookup tables for SRA 10 (Pomona/Walnut Valley) for a disturbed acreage of 4 acres and a receptor distance of 25 meters are presented in Table 4.3-9 and compared to the maximum daily on-site emissions generated during proposed Master Plan construction.

Table 4.3-9. Localized Significance Thresholds Analysis for Master Plan Construction

Year	NO_2	CO	PM_{10}	$PM_{2.5}$
	Pounds per Day			
2026	50.67	48.73	9.88	4.95
2027	27.55	41.74	1.02	0.85
2028	33.76	53.40	1.21	1.01

Table 4.3-9. Localized Significance Thresholds Analysis for Master Plan Construction

Year	NO_2	CO	PM_{10}	$PM_{2.5}$
	Pounds per Day			
2029	32.78	53.03	1.12	0.93
2030	32.06	52.65	1.06	0.88
Maximum of Summer and Winter Emissions	**50.67**	**53.40**	**9.88**	**4.95**
SCAQMD LST	*207*	*1,339*	*10*	*6*
LST exceeded?	**No**	**No**	**No**	**No**

Source: SCAQMD 2008.
Notes: NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.
See Appendix B, Construction (Summer) and Construction (Winter) output, for complete results.
Localized significance thresholds are shown for 4-acre project sites corresponding to a distance to a sensitive receptor of 25 meters. These estimates include implementation of the Master Plan's fugitive dust control strategies, including watering of an active site two times per day.

As shown in Table 4.3-9, construction activities would not generate emissions in excess of site-specific LSTs; therefore, site-specific impacts during construction of the proposed Master Plan would be **less than significant**.

Health Effects of Toxic Air Contaminants

As previously discussed, TACs are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. State law has established the framework for California's TAC identification and control program, which is generally more stringent than the federal program and aimed at TACs that are a problem in California. The state has formally identified more than 200 substances as TACs, including the federal HAPs, and has adopted and/or is adopting appropriate control measures for sources of these TACs, as described in Section 4.3.2, Regulatory Setting.

During proposed Master Plan construction, diesel particulate matter would be the primary TAC emitted from heavy-duty off-road diesel-fueled equipment and trucks. Off-road construction equipment and commercial trucks are subject to ATCMs to reduce diesel particulate emissions. Applicable ATCMs to the proposed Master Plan would include limiting heavy-duty diesel motor vehicle and off-road construction equipment idling in order to reduce public exposure to diesel particulate matter and other TACs. In general, it prohibits idling for more than 5 minutes. As described in Table 4.3-9 above, PM_{10} (representative of diesel particulate matter) emissions would be minimal. According to OEHHA, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should be limited to the period/duration of activities associated with the project. The following is required by state law to reduce diesel particulate matter emissions:

- Fleet owners of mobile construction equipment are subject to the CARB Regulation for In-Use Off-Road Diesel Vehicles (Cal. Code Regs., tit. 13, Chapter 9, Section 2449), the purpose of which is to reduce diesel particulate matter and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles.
- All commercial diesel vehicles are subject to requirements limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to 5 minutes; electric auxiliary power units should be used whenever possible (Cal. Code Regs., tit. 13, Chapter 10, Section 2485).

In the immediate vicinity of the campus, the closest off-site sensitive receptors include single-family residences adjacent to the eastern boundary, Kellogg Polytechnic Elementary School approximately 200 feet from the eastern boundary, residences located in the Pomona Islander Mobile Home Park adjacent to the southeast boundary, and single-family residences adjacent to the western boundary. On-site sensitive receptors include the existing student residence buildings throughout campus (Buildings 20, 21, 22, 23, 54, ,60, 61, 62, 63, 71, 72 73, and 74) the existing Cal Poly Pomona Childcare Center (Building 116), and I-Poly High School (Building 85).

Health effects from carcinogenic air toxins are usually described in terms of cancer risk. SCAQMD's Rule 1303 requires sources of TACs to install best control technology and reduce cancer risk to less than one incident per 100,000 population, which is equivalent to SCAQMD's incremental cancer risk threshold of significance of 10 in 1 million. "Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer based on the use of standard OEHHA risk assessment methodology. In addition, some TACs have noncarcinogenic effects. The SCAQMD recommends a Hazard Index of 1 or more for acute (short-term) and chronic (long-term) effects.[7]

Proposed Master Plan construction is anticipated to occur through 2040. However, since the proposed Master Plan involves construction of multiple phases in multiple areas within the Cal Poly Pomona campus, the Master Plan would not require the extensive use of heavy-duty construction equipment or diesel trucks concentrated in any one location over the entire duration of development, which would limit the exposure of any proximate individual sensitive receptor to TACs. Furthermore, PDF-AQ-1 would reduce diesel particulate matter emissions from off-road construction equipment through the entire duration of construction. Due to the relatively short period of exposure at any individual sensitive receptor and minimal particulate emissions generated, TACs emitted during construction would not be expected to result in concentrations causing significant health risks; therefore, impacts would be **less than significant**.

With regard to long-term operations, the proposed Master Plan could result in TAC emissions from an on-site generator associated with the Student Housing Phase III (Buildings 252–253) project; however, PDF-AQ-2 would require that this emergency generator under the proposed Master Plan would be compliant with CARB's tier 4 Final emission standards. In addition, potential delivery trucks would generate minimal diesel particulate matter emissions based on the infrequency of presence and short duration on campus. The on-site generator would result in TAC emissions; however, stationary sources, such as this generator, would be required to comply with the SCAQMD permitting process, which would ensure that potential health risks would be less than significant before issuing a permit to operate. Therefore, the proposed Master Plan would not result in exposure of sensitive receptors to substantial TAC concentrations during long-term operations and impacts would be **less than significant**.

Health Effects of Carbon Monoxide (Potential for Carbon Monoxide Hotspots)

Mobile source impacts occur on two scales. Regionally, proposed Master Plan-related travel would add to regional trip generation and increase the VMT within the local airshed and the SCAB. Locally, traffic generated by the proposed Master Plan would be added to the local roadway system near the Master Plan area. If such traffic occurs during periods of poor atmospheric ventilation, is composed of many vehicles cold-started and operating at pollution-inefficient speeds, and is operating on roadways already crowded with traffic, there is a potential for the formation of microscale CO hotspots in the area immediately around points of congested traffic. Because of

[7] Non-cancer adverse health risks are measured against a hazard index, which is defined as the ratio of the predicted incremental exposure concentrations of the various noncarcinogens from the proposed Master Plan to published reference exposure levels that can cause adverse health effects.

continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing.

At the time that the SCAQMD Handbook (1993) was published, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. In 2007, the SCAB was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. The SCAQMD conducted CO modeling for the 2003 AQMP[8] (SCAQMD 2003b) for the four worst-case intersections in the SCAB: (1) Wilshire Boulevard and Veteran Avenue, (2) Sunset Boulevard and Highland Avenue, (3) La Cienega Boulevard and Century Boulevard, and (4) Long Beach Boulevard and Imperial Highway. At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. Using CO emission factors for 2002, the peak modeled CO 1-hour concentration was estimated to be 4.6 ppm at the intersection of Wilshire Boulevard and Veteran Avenue. When added to the maximum 1-hour CO concentration from 2021 through 2023 at the Pomona monitoring station (see Table 4.3-2), which was 1.7 ppm in 2023, the 1-hour CO would be 6.3 ppm, while the CAAQS is 20 ppm.

The 2003 AQMP also projected 8-hour CO concentrations at these four intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO concentration was 3.8 ppm at the Sunset Boulevard and Highland Avenue intersection in 2002; the maximum 8-hour CO concentration was 3.4 ppm at the Wilshire Boulevard and Veteran Avenue in 2002. Adding the 3.8 ppm to the maximum 8-hour CO concentration from 2021 through 2023 at the Pomona monitoring station (see Table 4.3-2), which was 1.3 ppm in 2022, the 8-hour CO would be 5.1 ppm, while the CAAQS is 9.0 ppm.

Accordingly, CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be over 100,000 vehicles per day (e.g., intersections exceeding 100,000 vehicles per day do not necessarily result in a CO hotspot, but instead may require additional analysis per the methodology applied herein).

The traffic analysis prepared for the proposed Master Plan evaluated average daily trips at 11 roadway segments within the Master Plan area. Under 2040 conditions with full buildout of the proposed Master Plan, the maximum daily segment volume was estimated to be 24,200 trips, which occurs at the West Temple Avenue east of South Campus Drive (Section 4.16).

Because the proposed Master Plan would not contribute vehicles to any study intersection that would experience more than 100,000 vehicles per day during construction or operations and would not result in on-site CO emissions that would exceed the SCAQMD LST threshold during construction, a CO hotspot is not anticipated to occur, and associated impacts would be less than significant. As such, proposed Master Plan impacts associated with CO hotspots during construction and operations would be **less than significant**.

[8] SCAQMD's CO hotspot modeling guidance has not changed since 2003.

Project-Level Analysis for Near-Term Projects

Localized Significance Threshold

Construction activities associated with the proposed individual near-term projects would result in LST impacts similar to those described above at the program-level for implementation of the proposed Master Plan. Emissions from the construction phase of all of the near-term projects were calculated using CalEEMod. The evaluation of the LST impacts related to implementation of the proposed Master Plan in the program-level analysis above determined that the impact would be less than significant. As such, the near-term projects are accounted for in the modeling and therefore the impact related to LSTs would likewise be **less than significant**.

Health Effects of Toxic Air Contaminants

Because near-term projects would be constructed in multiple areas within the Cal Poly Pomona campus, the extensive use of heavy-duty construction equipment or diesel trucks concentrated in any one location would not be required over the entire duration of development, which would limit the exposure of any proximate individual sensitive receptor to TACs. Furthermore, PDF-AQ-1 would reduce diesel particulate matter emissions from off-road construction equipment through the entire duration of construction. Due to the relatively short period of exposure at any individual sensitive receptor and minimal particulate emissions generated, TACs emitted during construction of near-term projects would not be expected to result in concentrations causing significant health risks; therefore, impacts would be **less than significant**.

With regard to long-term operations, the proposed Master Plan could result in TAC emissions from an on-site generator associated with the Student Housing Phase III (Buildings 252–253) project; however, PDF-AQ-2, would require that this emergency generator under the proposed Master Plan would be compliant with CARB's tier 4 Final emission standards. In addition, potential delivery trucks would generate minimal diesel particulate matter emissions based on the infrequent usage. The on-site generator would result in TAC emissions; however, stationary sources such as this generator would be required to comply with the SCAQMD permitting process, which would ensure that potential health risks would be less than significant before issuing a permit to operate. Therefore, the proposed Master Plan would not result in exposure of sensitive receptors to substantial TAC concentrations during long-term operations and impacts would be **less than significant**.

Health Effects of Carbon Monoxide (Potential for Carbon Monoxide Hotspots)

As noted above, because the proposed Master Plan would not contribute vehicles to any study intersection that would experience more than 100,000 vehicles per day during construction or operations and would not result in on-site CO emissions that would exceed the SCAQMD LST threshold during construction, a CO hotspot is not anticipated to occur, and associated impacts would be less than significant. Given that near-term projects are captured within the maximum segment volumes during proposed Master Plan buildout and the construction LST analysis, near-term projects are accounted for in the program-level analysis above and therefore impacts would likewise be **less than significant**.

Impact 4.3-4 The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. (Less than Significant)

Program-Level Analysis for the Master Plan

The occurrence and severity of potential odor impacts depends on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receiving location. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be potentially generated from vehicles and equipment exhaust emissions during proposed Master Plan construction. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the individual Master Plan project sites and generally occur at magnitudes that would not affect a substantial number of people. Therefore, impacts associated with odors during construction would be **less than significant.**

Typical sources of substantial operational odors include landfills, rendering plants, chemical plants, agricultural uses, wastewater treatment plants, and refineries. Regarding operations, the proposed Master Plan involves development of additional campus facilities (nonresidential) and housing (residential) uses. Typical odors generated from operation of the proposed Master Plan would include vehicle exhaust generated by students, employees, or visitors traveling to and from the campus, through the periodic use of landscaping or maintenance equipment, from the temporary storage of typical solid waste (refuse), and from the dining facilities. Any odors produced would be minimal, would be similar to the existing uses, and would be confined to the immediate campus vicinity. Overall, operation of the proposed Master Plan would not result in odors that would affect a substantial number of people, and this impact would be **less than significant.**

Demolition and construction activities could result in airborne entrainment of asbestos, particularly when structures built prior to 1980 would be removed. However, these materials would be removed in accordance with regulatory requirements pursuant to SCAQMD Rule 1403 (Asbestos Emissions), which establishes survey, notification, and work practice requirements to prevent asbestos emissions during construction activities. Therefore, with compliance with all the applicable federal, state, and local regulations, the potential for the proposed Master Plan to create a significant impact to the public or environment from emissions of asbestos would be low. Therefore, impacts related to asbestos emissions would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Similar to the proposed Master Plan, odors would be potentially generated from vehicles and equipment exhaust emissions during near-term project construction. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the near-term project sites and generally occur at magnitudes that would not affect a substantial number of people. Therefore, impacts associated with odors during construction of near-term projects would be **less than significant.**

Typical sources of substantial operational odors include landfills, rendering plants, chemical plants, agricultural uses, wastewater treatment plants, and refineries. Near-term projects involve development of additional campus facilities (nonresidential) and housing (residential) uses. Typical odors generated from operation of the near-term projects would include vehicle exhaust generated by students, employees, or visitors traveling to and from the campus, through the periodic use of landscaping or maintenance equipment, from the temporary storage of typical solid waste (refuse), and from the dining facilities. Any odors produced would be minimal, would be similar to the existing uses, and would be

confined to the immediate campus vicinity. Overall, operation of the near-term project would not result in odors that would affect a substantial number of people, and this impact would be **less than significant.**

4.3.4.2 Cumulative Impacts

Impact 4.3-5 The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to air quality. (Less than Significant)

This section provides an analysis of cumulative impacts from construction and operation of the proposed Master Plan and other past, present, and reasonably foreseeable future projects, as required by Section 15130 of the State CEQA Guidelines. The past, present, and reasonably foreseeable future projects (i.e., related projects) used for this analysis are presented in Section 4.0.6, Cumulative Impacts Overview, of Section 4.0, Environmental Analysis, and in Table 4.0-1. Pending or Approved Reasonably Foreseeable Projects, of this Draft EIR. The geographic context for the cumulative analysis as it relates to air quality is the SCAB. Air quality impacts are generally considered to be a cumulative impact because individual land development projects are typically not large enough to create a significant impact independent of the existing air quality conditions and other sources of air pollutant emissions in the region. The potential for cumulatively considerable impacts related to the topic of air quality is discussed in further detail below.

As discussed under Impact 4.3-1 and 4.3-2, implementation of the proposed Master Plan would result in construction and operational emissions that would be below the SCAQMD's mass daily regional significance, and as such, would not conflict with the SCAQMD's consistency first criterion for consistency with the 2022 AQMP. As discussed above, buildout of the proposed Master Plan would not exceed the growth projections for population or employment estimates, and as such, the proposed Master Plan would not conflict with the SCAQMD's second criterion for consistency with the 2022 AQMP. Cumulative impacts associated with the conflict or obstruction of the AQMP that could impede reducing air pollutants would be less than significant; thus, the proposed Master Plan would not contribute to an existing cumulative impact. Impacts would be **less than significant**.

4.3.5 Mitigation Measures

Mitigation measures are not required because a significant impact has not been identified.

4.3.6 Level of Significance After Mitigation

All impacts would be less than significant without mitigation.

4.3.7 References

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4.4 Biological Resources

The following analysis identifies potential impacts to biological resources resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing biological resource conditions in the proposed Master Plan area, discusses the regulatory setting, evaluates potential impacts to biological resources, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts. Biological resources data compiled based on a literature review and reconnaissance survey conducted for the proposed Master Plan is provided in Appendix C.

No comments related to biological resources were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are provided in Appendix A.

4.4.1 Environmental Setting

The Cal Poly Pomona main campus is located at the eastern edge of the San Gabriel Valley, partially within the jurisdictional boundaries of the incorporated cities of Pomona and Walnut as well as unincorporated County of Los Angeles, in Southern California (see Chapter 3, Project Description, Figure 3-1). The campus is situated to the south and east of the San Jose Hills and north of the Puente Hills and Chino Hills, all of which are a part of the lower Transverse Range. Much of the San Gabriel and Pomona valleys, including areas immediately surrounding the Cal Poly Pomona main campus, is highly urbanized and developed and the main campus is situated southwest of the intersection of several major highways, including Interstate 10 Freeway (I-10), State Route (SR) 57, and SR 71. The main campus is generally bounded by I-10 to the north, Valley Boulevard to the east, and West Temple Avenue to the south, while Mount San Antonio Community College (Mt. SAC) campus and the Forest Lawn Cemetery are situated to the west of campus.

The 77-acre Voorhis Ecological Reserve, located in the northwest portion of campus, supports a variety of native plants and wildlife. The scrub, chaparral, and woodland communities of the Voorhis Ecological Reserve provide local open space contiguous with similar communities in the San Jose Hills to the west of campus. Additional open space present in the proposed Master Plan vicinity includes Frank G. Bonelli Regional Park, located northeast of campus, and the foothills of the Chino Hills, southeast of campus.

Potential impacts to biological resources resulting from the implementation of the proposed Master Plan were evaluated within the proposed Master Plan boundary. The existing conditions present within these areas are described in the sections that follow. Section 4.4.3.2, Methodology, provides additional information about how biological resources in the study area were identified and evaluated.

4.4.1.1 Topography and Soils

The topography of the study area ranges from approximately 690 feet above mean sea level at Cal Poly Pomona University Village on the east side of campus to approximately 1,100 feet above mean sea level along the ridges of the Voorhis Ecological Reserve (Google 2024). Within the campus, slopes range from minimal (3%) in the east, gradually getting steeper to the west and northwest, where some slopes are in excess of 20% (CSU 2000a). The developed portions of campus are mostly flat. The open space areas northwest, west, and southwest of the core campus consist of two topographically distinct areas: 1) the steeply sloped terrain in the northwest portion of campus, largely overlapping the Voorhis Ecological Reserve and adjacent wooded areas to the east of the reserve;

and 2) the more gently sloping, open hills in the southwest portion of campus. These areas are collectively referred to as the campus's "open space" areas.

Nine soil types have been mapped in the study area by the U.S. Department of Agriculture Natural Resources Conservation Service Web Soil Survey (USDA 2024a); these soil types are listed below and depicted on Figure 4.4-1.

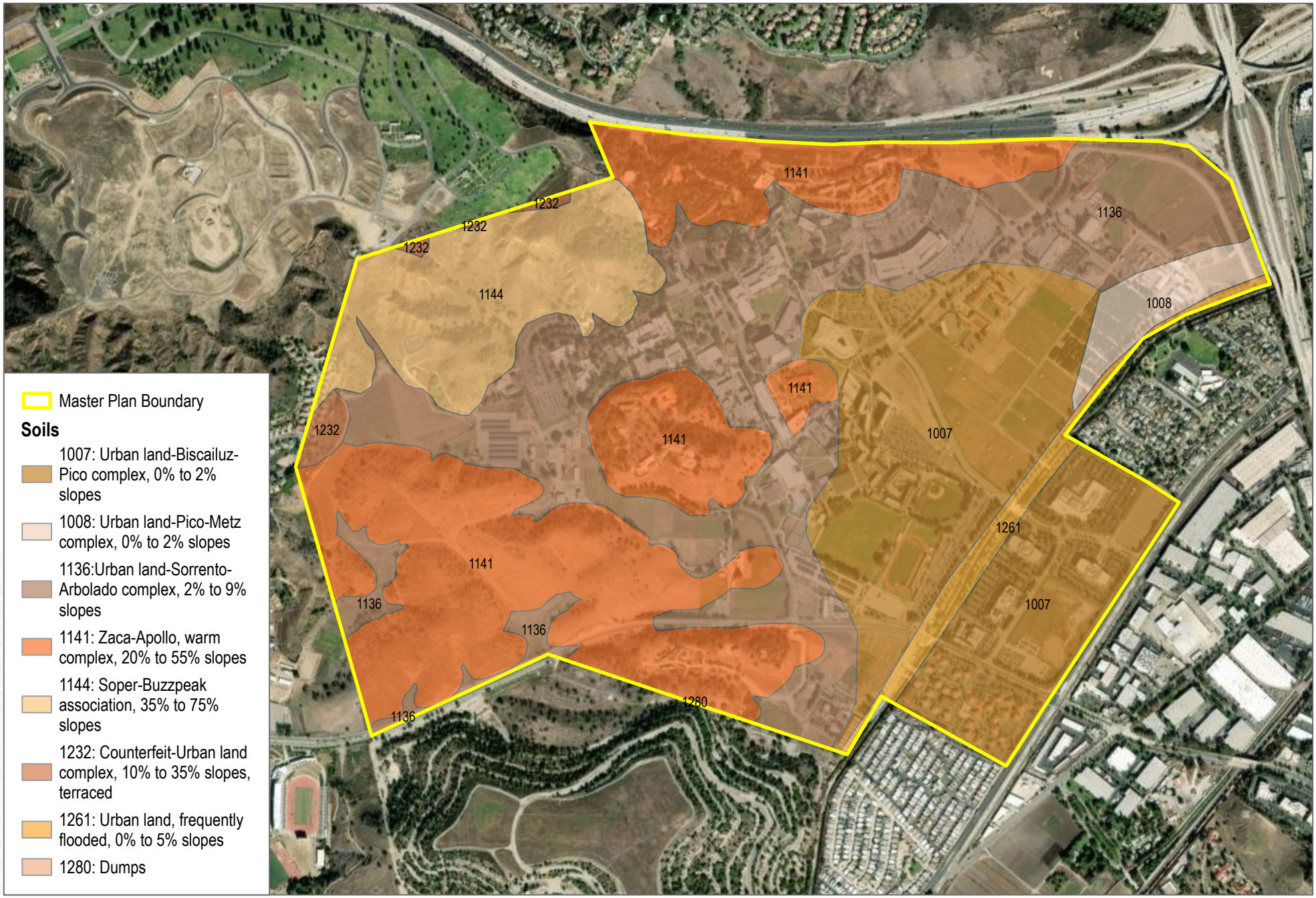
- Counterfeit–Urban land complex, 10% to 35% slopes, terraced
- Dumps
- Soper–Buzzpeak association, 35% to 75% slopes
- Urban land, frequently flooded, 0% to 5% slopes
- Urban land–Biscailuz–Pico complex, 0% to 2% slopes
- Urban land–Pico–Metz complex, 0% to 2% slopes
- Urban land–Sorrento–Arbolado complex, 2% to 9% slopes
- Zaca–Apollo, warm complex, 20% to 55% slopes

Four soil types make up the majority of the study area: Urban land–Biscailuz–Pico complex, 0% to 2% slopes, has been mapped on 25.7% of the study area, primarily on the eastern side of the campus that is currently occupied by agricultural uses, parking lots, athletic fields, and other university buildings; Urban land–Sorrento–Arbolado complex, 2% to 9% slopes, has been mapped on 30.6% of the study area, primarily on developed portions of the core campus; Zaca–Apollo, warm complex, 20% to 55% slopes has been mapped on 28.8% of the study area, in the woodland areas at the north of campus, immediately south of I-10, and in the open space at the southwestern corner of the study area; and Soper–Buzzpeak association, 35% to 75% slopes has been mapped in the open space associated with the Voorhis Ecological Reserve, making up 9.7% of the study area.

Due to the historic disturbance and development on much of the campus, natural soils are expected to be present only in undisturbed open space areas on the northwest and west side of the study area. None of the mapped soils are listed on the Hydric Soils List for the soil survey area in which the campus is located (USDA 2024b).

4.4.1.2 Vegetation Communities and Land Cover Types

A total of 20 vegetation communities and 6 land cover types were mapped in the study area during the reconnaissance survey. These vegetation communities and land cover types are described below, their acreages, state rarity rank, and sensitivity designation (if any) are presented in Table 4.4-1, and their spatial distributions are presented in Figure 4.4-2. Vegetation communities were mapped using A Manual of California Vegetation, Online Edition (CNPS 2024a) and the California Department of Fish and Wildlife (CDFW) California Natural Community List (CDFW 2023), where feasible, with modifications made to accommodate the lack of conformity of the observed communities (e.g., developed/disturbed land cover types) using Oberbauer et al. (2008) or Jones and Stokes (1993). Vegetation communities and land covers were delineated to the vegetation alliance level and, where appropriate, the association level. A total of seven sensitive vegetation communities were mapped in the study area, including *Juglans californica*/annual herbaceous association, *Juglans californica/Heteromeles arbutifolia* association, *Artemisia californica–Opuntia littoralis* provisional association, *Platanus racemosa–Quercus agrifolia* association, *Platanus racemosa*/annual grass association, *Umbellularia californica–Platanus racemosa* association, and *Sequoia sempervirens* association. See Table 4.4-1 for additional information about these sensitive vegetation communities.



SOURCE: USDA

DUDEK

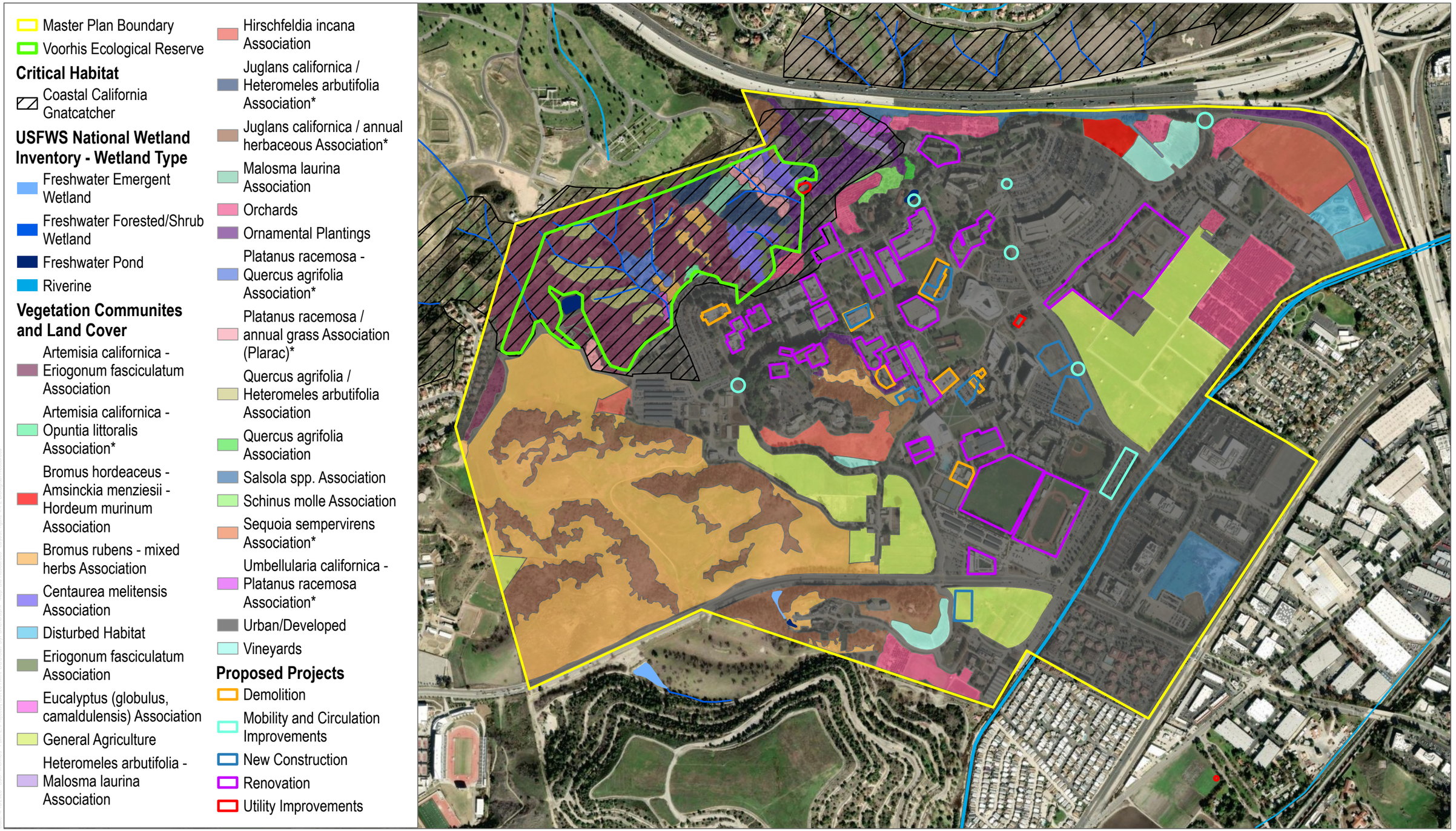
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FIGURE 4.4-1

Soils

Cal Poly Pomona Campus Master Plan EIR

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SOURCE: USFWS; * Sensitive Vegetation Communities (CDFW 2023)

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0 500 1,000 Feet

FIGURE 4.4-2

Biological Resources

Cal Poly Pomona Campus Master Plan EIR

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In general, the core campus is mapped as urban/developed lands. Agricultural lands, as well as orchards and vineyards, are scattered among the developed portions of campus, particularly in the southern and eastern portions of campus. Coastal scrub communities are found exclusively in the steeply sloped open space northwest of the core campus, primarily in the western part of the Voorhis Ecological Reserve. Woodland and riparian communities are present in the canyon bottoms of this part of campus and extend to the east where they intermix with chaparral communities in the eastern portion of the Voorhis Ecological Reserve and areas surrounding the Kellogg House. Grasslands and walnut woodlands are associated primarily with the open hills southwest of the core campus, including areas south of West Temple Ave surrounding the John T. Lyle Center for Regenerative Studies.

Table 4.4-1. Vegetation Communities and Land Covers in the Cal Poly Pomona Master Plan Study Area

Vegetation Community	Alliance	Association	State Ranking[1]	Sensitive (Y/N)	Area (Acres)
Woodland					
Eucalyptus–tree of heaven–black locust groves	*Eucalyptus spp.–Ailanthus altissima–Robinia pseudoacacia Woodland Semi-Natural Alliance*	*Eucalyptus (globulus, camaldulensis)* (Eucglocam)	SNA	N	0.53
California walnut groves	*Juglans californica* Forest and Woodland Alliance	*Juglans californica/ annual herbaceous* (Jugcal)	S3	Y	66.97
		Juglans californica/ Heteromeles arbutifolia (Jugcal/Hetarb)	S3	Y	6.87
Coast live oak woodland and forest	*Quercus agrifolia* Forest and Woodland Alliance	*Quercus agrifolia* (Queagr)	S5	N	0.43
		Quercus agrifolia/ Heteromeles arbutifolia (Queagr/Hetarb)	N/A	N	6.77
Pepper tree or Myoporum groves	*Schinus* (*molle*, *terebinthifolius*)–*Myoporum laetum* Forest and Woodland Semi-Natural Alliance	*Schinus molle* (Schmol)	SNA	N	1.74
				Subtotal[2]	*83.31*
Riparian					
California sycamore–coast live oak riparian woodlands	*Platanus racemosa–Quercus agrifolia* Woodland Alliance	*Platanus racemosa–Quercus agrifolia* (Plarac-Queagr)	S3	Y	2.71
		Platanus racemosa/ annual grass (Plarac)	S3	Y	2.92
		Umbellularia californica–Platanus racemosa (Umbcal-Plarac)	S3	Y	2.05
				Subtotal[2]	*7.68*

Table 4.4-1. Vegetation Communities and Land Covers in the Cal Poly Pomona Master Plan Study Area

Vegetation Community	Alliance	Association	State Ranking[1]	Sensitive (Y/N)	Area (Acres)
Forest					
Redwood forest and woodland	*Sequoia sempervirens* Forest and Woodland Alliance	*Sequoia sempervirens* (Seqsem)	N/A	Y	0.18
				Subtotal[2]	*0.18*
Scrub					
California sagebrush–(purple sage) scrub	*Artemisia californica–(Salvia leucophylla)* Shrubland Alliance	*Artemisia californica–Eriogonum fasciculatum* (Artcal-Erifas)	S4	N	54.51
		Artemisia californica–Opuntia littoralis [provisional association] (Artcal-Opulit)	N/A	Y	0.47
California buckwheat scrub	*Eriogonum fasciculatum* Shrubland Alliance	*Eriogonum fasciculatum* (Erifas)	S5	N	4.28
				Subtotal[2]	*59.26*
Chaparral					
Holly leaf cherry–toyon–greenbark ceanothus chaparral	*Prunus ilicifolia–Heteromeles arbutifolia–Ceanothus spinosus* Shrubland Alliance	*Heteromeles arbutifolia–Malosma laurina* (Hetarb-Mallau)	S4	N	3.83
Laurel sumac scrub	*Malosma laurina* Shrubland Alliance	*Malosma laurina Association* (Mallau)	S4	N	2.11
				Subtotal[2]	*5.94*
Grassland and Herb Dominated					
Wild oats and annual brome grasslands	*Avena* spp.–*Bromus* spp. Herbaceous Semi-Natural Alliance	*Bromus hordeaceus–Amsinckia menziesii–Hordeum murinum* (Brohor-Amsmen-Hormur)	SNA	N	3.15
Red brome or Mediterranean grass grasslands	*Bromus rubens–Schismus* (*arabicus, barbatus*) Herbaceous Semi-Natural Alliance	*Bromus rubens–mixed herbs* (Brorub)	SNA	N	122.80
Upland mustards or star-thistle fields	*Brassica nigra–Centaurea* (*solstitialis, melitensis Herbaceous Semi-Natural Alliance)*	*Centaurea melitensis* (Cenmel)	SNA	N	6.14
		Hirschfeldia incana [provisional] (Hirinc)	SNA	N	23.36

Table 4.4-1. Vegetation Communities and Land Covers in the Cal Poly Pomona Master Plan Study Area

Vegetation Community	Alliance	Association	State Ranking[1]	Sensitive (Y/N)	Area (Acres)
Russian thistle–dyers woad–fivehook bassia fields	*Salsola tragus–Isatis tinctoria–Bassia* spp. Herbaceous Semi-Natural Alliance	*Salsola spp.* (Sal)	SNA	N	13.77
				Subtotal[2]	*169.22*
Non-Vegetated Land Covers					
Disturbed habitat (DH)	N/A	N/A	N/A	N	6.54
General agriculture (AGR)	N/A	N/A	N/A	N	75.38
Orchards (ORC)	N/A	N/A	N/A	N	33.85
Ornamental plantings (ORN)	N/A	N/A	N/A	N	20.02
Urban/developed (DEV)	N/A	N/A	N/A	N	502.22
Vineyards (VIN)	N/A	N/A	N/A	N	9.81
				Subtotal[2]	*647.82*
				Total[2]	**973.40[3]**

Sources: CDFW California Natural Community List (CDFW 2023) and A Manual of California Vegetation Online (CNPS 2024a).

1 The conservation status of a vegetation community is designated by a number from 1 to 5, preceded by a letter reflecting the appropriate geographic scale of the assessment (G = global, N = national, and S = subnational). The numbers have the following meaning (NatureServe 2023): 1 = critically imperiled; 2 = imperiled; 3 = vulnerable to extirpation or extinction; 4 = apparently secure; 5 = demonstrably widespread, abundant, and secure. GNR = Global rank not yet assessed.

2 Totals may not sum due to rounding.

3 The habitat acreage calculations differ from the recorded campus acreage due to the methods used to measure them.

Notes

State Rarity Ranks:

N/A – not applicable included for vegetation communities and land cover types that are not included in the CDFW California Natural Community List (CDFW 2023) or A Manual of California Vegetation Online (CNPS 2024a) or for which no state rank is currently provided by CDFW (2023). SNA – state rank not applicable. Semi-natural alliances are not assigned a state rarity rank. S3: Vulnerable – At moderate risk of extirpation in the jurisdiction due to a fairly restricted range, relatively few populations or occurrences, recent and widespread declines, threats, or other factors. S4: Apparently secure – At a fairly low risk of extirpation in the jurisdiction due to an extensive range and/or many populations or occurrences, but with possible cause for some concern as a result of local recent declines, threats, or other factors. S5: Secure – At very low or no risk of extirpation in the jurisdiction due to a very extensive range, abundant populations or occurrences, with little to no concern from declines or threats. Natural communities with a state rarity rank of S1, S2, or S3 are considered sensitive natural communities.

Sensitive:

N = no

Y = yes

Woodland

Eucalyptus–Tree of Heaven–Black Locust Groves

Eucalyptus–tree of heaven–black locust groves communities feature non-native trees such as eucalyptus trees (*Eucalyptus* spp.), tree of heaven (*Ailanthus altissima*), or black locust (*Robinia pseudoacacia*) as the dominant tree in an open to continuous canopy less than 60 meters (197 feet) in height. These communities are typically planted as part of ornamental landscaping and windbreaks or have become naturalized in a wide variety of settings (CNPS

2024a). One association in the alliance was mapped in the study area. While many eucalyptus trees are planted as part of landscaping in developed areas, a small stand of naturalized *Eucalyptus (globulus, camaldulensis)* association was mapped along the southern boundary of the Voorhis Ecological Reserve.

California Walnut Groves

California walnut groves communities (*Juglans californica* forest and woodland alliance) include California walnut (*Juglans californica*) as the dominant or co-dominant tree in an open to continuous tree canopy less than 15 meters (49 feet) in height. Other co-dominant species may include white alder (*Alnus rhombifolia*), California ash (*Fraxinus dipetala*), toyon (*Heteromeles arbutifolia*), coast live oak (*Quercus agrifolia*), valley oak (*Quercus lobata*), red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), blue elderberry (*Sambucus mexicana*), and California bay (*Umbellularia californica*) (CNPS 2024a). These communities typically occur on slopes but may also occur within riparian corridors (CNPS 2024a). Two associations in the alliance were mapped in the study area. Stands of *Juglans californica*/annual herbaceous association are scattered throughout the study area, particularly prevalent on the open hills in the southwestern portion of the property. *Juglans californica/Heteromeles arbutifolia* association was mapped in the eastern extent of the Voorhis Ecological Reserve.

Both the *Juglans californica*/annual herbaceous association and the *Juglans californica/Heteromeles arbutifolia* association have a state rarity rank of S3 and each is considered a sensitive vegetation community by CDFW (2023).

Coast Live Oak Woodland and Forest

Coast live oak woodland and forest communities (*Quercus agrifolia* forest and woodland alliance) include coast live oak as the dominant or co-dominant tree in a savanna-like (evenly distributed but with less than 10% cover) to continuous tree canopy less than 30 meters (98 feet) in height. Other co-dominant species may include bigleaf maple (*Acer macrophyllum*), madrone (*Arbutus menziesii*), California walnut, blue oak (*Quercus douglasii*), Engelmann oak (*Quercus engelmannii*), California black oak (*Quercus kelloggii*), valley oak, and California bay (CNPS 2024a). These communities occur on a variety of settings, including canyon bottoms, slopes, and flats (CNPS 2024a). Two associations in the alliance were mapped in the study area. A stand of *Quercus agrifolia* association was mapped between Los Olivos Commons and the Cedritos Residence Hall. A few stands of *Quercus agrifolia/Heteromeles arbutifolia* association were mapped on north-facing slopes at the center of the Voorhis Ecological Reserve.

Pepper Tree or Myoporum Groves

Pepper tree or myoporum groves communities feature non-native trees such as Peruvian peppertree (*Schinus molle*), Brazilian peppertree (*Schinus terebinthifolius*), or myoporum (*Myoporum laetum*) as the dominant tree in an open to continuous canopy less than 18 meters (59 feet) in height. These communities are planted as part of ornamental landscaping or have become naturalized in a wide variety of settings, such as coastal canyons, washes, slopes, riparian areas, and roadsides (CNPS 2024a). One association in the alliance was mapped in the study area. While many Peruvian peppertrees are planted as part of landscaping in developed areas, a small stand of *Schinus molle* association was mapped north of the Manor House, La Cienega Center, and Palmitas Residence Hall.

Riparian

California Sycamore–Coast Live Oak Riparian Woodlands

California sycamore–coast live oak riparian woodlands communities (*Platanus racemosa–Quercus agrifolia* woodland alliance) include California sycamore (*Platanus racemosa*) and/or coast live oak as the dominant or co-dominant tree in an open to intermittent tree canopy less than 35 meters (115 feet) in height. Other species associated with the alliance include white alder, California walnut, Fremont cottonwood (*Populus fremontii*), valley oak, sandbar willow (*Salix exigua*), Goodding's willow (*Salix gooddingii*), red willow, arroyo willow, yellow willow (*Salix lutea*), Peruvian peppertree, and California bay (CNPS 2024a). These communities typically occur in canyons, intermittent streams, springs, seeps, streambanks, and floodplain terraces (CNPS 2024a). Three associations in the alliance were mapped in the study area. A stand of *Platanus racemosa–Quercus agrifolia* association is mapped in a canyon bottom at the center of Voorhis Ecological Reserve. Two stands of *Platanus racemosa/annual grass* association were mapped scattered on slopes in the northern portion of the study area, within and adjacent to the Voorhis Ecological Reserve. Additionally, a stand of *Umbellularia californica–Platanus racemosa* association was mapped along the northern extent of the study area, northwest of Los Olivos Commons.

All three associations of the California sycamore–coast live oak riparian woodlands alliance have a state rarity rank of S3 and each is considered a sensitive vegetation community by CDFW (2023).

Forest

Redwood Forest and Woodland

Redwood forest and woodland communities (*Sequoia sempervirens* forest and woodland alliance) include redwood as the dominant or co-dominant tree in an intermittent or continuous tree canopy less than 120 meters (394 feet) in height. Other species associated with the alliance include grand fir (*Abies grandis*), bigleaf maple, red alder (*Alnus rubra*), madrone, golden chinquapin (*Chrysolepis chrysophylla*), tanoak (*Notholithocarpus densiflorus*), Sitka spruce (*Picea sitchensis*), Douglas fir (*Pseudotsuga menziesii*), western hemlock (*Tsuga heterophylla*), and California bay (CNPS 2024a). These communities typically occur on raised stream terraces, benches, slopes of a variety of aspects, and ridges within their natural distribution range (CNPS 2024a), but are often planted as ornamental trees in southern California. One association in the alliance was mapped in the study area. A very small stand of *Sequoia sempervirens* association was mapped immediately west of the Music Building.

The *Sequoia sempervirens* association does not have a state rarity rank; however, the redwood forest and woodland alliance has a state rarity rank of S3 and this association is considered sensitive by CDFW (2023).

Scrub

California Sagebrush–(Purple Sage) Scrub

California sagebrush–(purple sage) scrub communities (*Artemisia californica–Salvia leucophylla* shrubland alliance) include California sagebrush (*Artemisia californica*) and/or purple sage (*Salvia leucophylla*) as dominant or co-dominant shrubs in an intermittent to continuous shrub layer less than 2 meters (7 feet) in height or in two tiers with the second tier less than 5 meters (16 feet) in height. Other species associated with the California sagebrush scrub alliance include chamise, coyotebrush, bladderpod (*Peritoma arborea*), bush monkeyflower, California brittle bush, brittle bush (*Encelia farinosa*), California jointfir (*Ephedra californica*), narrowleaf goldenbush

(*Ericameria linearifolia*), ashy buckwheat (*Eriogonum cinereum*), California buckwheat, chaparral yucca, golden-yarrow (*Eriophyllum confertiflorum*), Menzies' goldenbush, common deerweed, heartleaf keckiella (*Keckiella cordifolia*), southern honeysuckle (*Lonicera subspicata*), bush mallow, laurel sumac, coast prickly pear (*Opuntia littoralis*), hollyleaf redberry (*Rhamnus ilicifolia*), lemonade berry (*Rhus integrifolia*), sugarbush, white sage, black sage, and poison oak (*Toxicodendron diversilobum*) (CNPS 2024a). These communities typically occur on steep slopes or rarely flooded terraces along streams in alluvial- or colluvial-derived soils (CNPS 2024a). Two associations in the alliance were mapped in the study area. The *Artemisia californica–Eriogonum fasciculatum* association is prevalent on the slopes in the northwest portion of the study area and make up large portions of the Voorhis Ecological Reserve. The *Artemisia californica–Opuntia littoralis* provisional association was mapped in a single location in the Voorhis Ecological Reserve, immediately north of the Health Services parking lot.

The *Artemisia californica–Opuntia littoralis* provisional association does not have a state rarity rank; however, this provisional association is considered a sensitive vegetation community by CDFW (2023).

California Buckwheat Scrub

California buckwheat scrub communities (*Eriogonum fasciculatum* shrubland alliance) include California buckwheat (*Eriogonum fasciculatum*) or chaparral yucca (*Hesperoyucca whipplei*) as the dominant or co-dominant species in the shrub canopy. This alliance has a continuous or intermittent shrub canopy less than 2 meters (7 feet) in height with a variable, sometimes grassy ground layer. Other species associated with the alliance include California sagebrush, coyotebrush (*Baccharis pilularis*), bush monkeyflower (*Diplacus aurantiacus*), California brittle bush, Menzies' goldenbush (*Isocoma menziesii*), common deerweed, bush mallow, white sage (*Salvia apiana*), or black sage. Communities in this alliance typically occur on upland slopes, intermittently flooded arroyos, channels and washes, and rarely flooded terraces in coarse well-drained soils (CNPS 2024a). One association in the alliance, *Eriogonum fasciculatum* association, was mapped in the study area. This community is prevalent on the slopes immediately east of the "CPP" letters in the Voorhis Ecological Reserve.

Chaparral

Holly Leaf Cherry–Toyon–Greenbark Ceanothus Chaparral

Holly leaf cherry–toyon–greenbark ceanothus chaparral communities (*Prunus ilicifolia–Heteromeles arbutifolia–Ceanothus spinosus* shrubland alliance) include holly leaf cherry (*Prunus ilicifolia*), toyon, and/or greenbark ceanothus (*Ceanothus spinosus*) as dominant or co-dominant shrubs in an open to continuous shrub layer less than 15 meters (49 feet) in height. Other species associated with the holly leaf cherry–toyon–greenbark ceanothus chaparral alliance include California sagebrush, bigpod ceanothus (*Ceanothus megacarpus*), birch leaf mountain mahogany (*Cercocarpus betuloides*), pipestem clematis (*Clematis lasiantha*), bush monkeyflower, California buckwheat, California ash, snapdragon penstemon (*Keckiella antirrhinoides*), heartleaf keckiella, inland scrub oak (*Quercus berberidifolia*), hollyleaf redberry, sugarbush (*Rhus ovata*), and black sage (*Salvia mellifera*) (CNPS 2024a). These communities often occur on north-facing steep slopes in bedrock- or colluvial-derived soils (CNPS 2024a). One association in the alliance was mapped in the study area. Two stands of *Heteromeles arbutifolia–Malosma laurina* association were mapped on slopes in the northern portion of the study area, east of the Kellogg House and along the eastern extent of the Voorhis Ecological Reserve.

Laurel Sumac Scrub

Laurel sumac scrub communities (*Malosma laurina* shrubland alliance) include laurel sumac (*Malosma laurina*) as the dominant or co-dominant shrub in an open to continuous shrub layer less than 5 meters (16 feet) in height. Other species associated with the alliance include California sagebrush, bigpod ceanothus, bush monkeyflower, California brittle bush (*Encelia californica*), ashy buckwheat, California buckwheat, chaparral yucca, toyon, snapdragon penstemon, hollyleaf redberry, lemonade berry, sugarbush, purple sage, black sage, Parry's tetracoccus (*Tetracoccus dioicus*), and poison oak (CNPS 2024a). These communities often occur on steep slopes in shallow and fine-textured soils (CNPS 2024a). One association in the alliance was mapped in the study area. A stand of *Malosma laurina* association was mapped on slopes in the eastern portion of the Voorhis Ecological Reserve.

Grassland and Herb Dominated

Wild Oats and Annual Brome Grasslands

Wild oats and annual brome grasslands communities (*Avena* spp.–*Bromus* spp. herbaceous semi-natural alliance) include slender oat (*Avena barbata*), wild oat (*Avena fatua*), purple false brome (*Brachypodium distachyon*), big quakinggrass (*Briza maxima*), ripgut brome (*Bromus diandrus*), soft brome (*Bromus hordeaceus*), and/or mouse barley (*Hordeum murinum*) as the dominant or co-dominant species in an herbaceous layer less than 1.2 meters (4 feet) in height. Other species associated with the alliance include Australian saltbush (*Atriplex semibaccata*) and other barleys (*Hordeum* spp.) (CNPS 2024a). These communities occur on all topographic settings in foothills, disturbed areas, rangelands, and openings in woodlands (CNPS 2024a). One association in the alliance was mapped in the study area. A patch of *Bromus hordeaceus–Amsinckia menziesii–Hordeum murinum* association was mapped in an empty lot located north of Parking Lot F5.

Red Brome or Mediterranean Grass Grasslands

Red brome or Mediterranean grass grasslands communities (*Bromus rubens–Schismus* [*arabicus*, *barbatus*] herbaceous semi-natural alliance) include red brome (*Bromus rubens*), Arabian schismus (*Schismus arabicus*), and/or common Mediterranean grass (*Schismus barbatus*) as the dominant or co-dominant species in an herbaceous layer less than 75 centimeters (2.5 feet) in height. Other species associated with the alliance include a variety of non-native herbaceous species (CNPS 2024a). These communities occur on a wide range of topographic settings and soil substrates (CNPS 2024a). One association in the alliance was mapped in the study area. *Bromus rubens–mixed herbs* association was mapped on the open slopes throughout the southwestern portion of the study area.

Upland Mustards or Star-Thistle Fields

Upland mustards or star-thistle fields communities (*Brassica nigra–Centaurea* [*solstitialis*, *melitensis*] herbaceous semi-natural alliance) include black mustard (*Brassica nigra*), field mustard (*Brassica rapa*), Italian plumeless thistle (*Carduus pycnocephalus*), Maltese star-thistle (*Centaurea melitensis*), yellow star-thistle (*Centaurea solstitialis*), cardoon (*Cynara cardunculus*), Geraldton carnation weed (*Euphorbia terracina*), shortpod mustard (*Hirschfeldia incana*), Dyer's woad (*Isatis tinctoria*), cultivated radish (*Raphanus sativus*), or other similar ruderal forbs as the dominant or co-dominant species in an herbaceous layer less than 3 meters (10 feet) in height. These communities occur in a wide variety of settings, including fallow fields, rangelands, roadsides, and disturbed areas, on clay to sandy soils (CNPS 2024a). Two associations in the alliance were mapped in the study area. *Centaurea melitensis* association was mapped on open slopes within the eastern extent of the Voorhis Ecological Reserve.

Hirschfeldia incana provisional association was mapped on open slopes south of The Collins College of Hospitality Management Building, west of Parking Lot M, and west of East Campus Drive.

Russian Thistle–Dyers Woad–Fivehook Bassia Fields

Russian thistle–dyer's woad–fivehook bassia fields communities (*Salsola tragus–Isatis tinctoria–Bassia* spp. herbaceous semi-natural alliance) include prickly Russian thistle (*Salsola tragus*), Dyer's woad (*Isatis tinctoria*), or any *Bassia* species as the dominant or co-dominant species in the herbaceous layer (Sawyer et al. 2009). This alliance and its affiliated associations are pending additions in the California Natural Community List (CDFW 2023) and the Manual of California Vegetation Online (CNPS 2024a). One association in the alliance was mapped in the study area. *Salsola* spp. association was mapped on disturbed slopes adjacent to the I-10 and in a vacant lot southeast of the Southern California Edison building.

Non-Vegetated Land Covers

Disturbed Habitat

Although not recognized by the Manual of California Vegetation, Online Edition (CNPS 2024a) or the Natural Community List (CDFW 2023), the disturbed habitat land cover type is described in the *Draft Vegetation Communities of San Diego County* (Oberbauer et al. 2008). Disturbed habitat is described as areas generally lacking vegetation due to high levels of existing or historical human disturbance and are no longer recognizable as a native or naturalized vegetation association. Areas mapped as disturbed habitat may include unpaved roads, trails, and graded areas (Oberbauer et al. 2008). Vegetation in these areas, if present at all, is usually sparse and dominated by non-native weedy herbaceous species (Oberbauer et al. 2008). Areas that had been recently mowed or active work areas containing bare ground and ruderal vegetation were mapped as disturbed habitat was mapped within the study area, specifically in the eastern extent of the campus.

General Agriculture

Although not recognized by the Manual of California Vegetation, Online Edition (CNPS 2024a) or the Natural Community List (CDFW 2023), the general agriculture land cover type is described in the *Draft Vegetation Communities of San Diego County* (Oberbauer et al. 2008). General agriculture refers to areas that are supporting active agricultural operations that are not specifically vineyards or orchards (Oberbauer et al. 2008). Areas mapped as general agriculture within the study area were characterized by active cultivation of row crops or pasture.

Orchards

Although not recognized by the Manual of California Vegetation, Online Edition (CNPS 2024a) or the Natural Community List (CDFW 2023), the orchards land cover type is described in the *Draft Vegetation Communities of San Diego County* (Oberbauer et al. 2008). The orchards designation refers to areas supporting active agricultural operations comprising artificially irrigated areas dominated by one or several fruit tree or shrub species (Oberbauer et al. 2008). The vegetative structure of orchards is typically characterized by a low, bushy canopy with an open understory made up of short grasses and other herbaceous plants in between rows (Oberbauer et al. 2008). Areas mapped as orchards within the study area contained active cultivation of a variety of fruit trees, including dragon fruit (*Hylocereus* spp.), sweet orange (*Citrus ×sinensis*), avocado (*Persea americana*), among others.

Ornamental Plantings

Although not recognized by the Manual of California Vegetation, Online Edition (CNPS 2024a) or the Natural Community List (CDFW 2023), the ornamental plantings (or ornamental landscaping) land cover type is described in the *Methods Used to Survey the Vegetation of Orange County Parks and Open Space Areas and the Irvine Company Property* (Jones and Stokes 1993). The ornamental plantings designation refers to areas dominated with non-native ornamental species. This land cover type is typically found in greenbelts, parks, and landscaped areas. Areas where ornamental species were observed in large swathes were mapped as ornamental plantings, particularly in the northern extent of the Master Plan area surrounding the Kellogg House and northeast of Building 1.

Urban/Developed

Although not recognized by the Manual of California Vegetation (CNPS 2024a) or the Natural Community List (CDFW 2023), the urban/developed (or developed land) land cover type is described in Draft Vegetation Communities of San Diego County (Oberbauer et al. 2008). This land cover type is described areas supporting human-made structures, including homes, yards, sidewalks, and other highly modified lands supporting structures associated with dwellings or other permanent structures. Vegetation in these areas, if present at all, is typically associated with ornamental landscaping that has been included in the development footprint (Oberbauer et al. 2008). Most of the developed lands in the study area comprise buildings, paved areas, integrated ornamental landscaping, and hardscapes associated with the Forest Lawn Cemetery and campus facilities.

Vineyards

Although not recognized by the Manual of California Vegetation, Online Edition (CNPS 2024a) or the Natural Community List (CDFW 2023), the vineyards land cover type is described in the Draft Vegetation Communities of San Diego County (Oberbauer et al. 2008). The vineyards designation refers to areas supporting active agricultural operations comprising mono-cultural trellised rows (Oberbauer et al. 2008). Often there is an understory made up of short grasses and other herbaceous plants in between rows (Oberbauer et al. 2008). Areas mapped as vineyards within the study area contained active cultivation of wine (or table) grapes (*Vitis vinifera*).

4.4.1.3 Plants and Wildlife

A total of 70 species of vascular plants, including 16 native species and 54 non-native species, were recorded during the reconnaissance survey. Based on collections in the Cal Poly Pomona herbarium, 261 vascular plant species have been inventoried on the Cal Poly Pomona main campus (Cal Poly Pomona 2024a). Vegetation in the developed portions of the Cal Poly Pomona main campus is dominated by mature ornamental trees and other landscaping. The remaining areas on campus consist of the Voorhis Ecological Reserve in the northwest corner of campus, which is comprised primarily of native plant species associated with chaparral, scrub, and woodland communities, although some portions are dominated by ornamental plantings; naturalized plant species associated with the herbaceous communities in the hills on the western side of campus; and the crops associated with the managed vineyards, orchards, and agricultural lands on the east and southeast sides of campus.

A total of 24 wildlife species were recorded during the reconnaissance survey, including 23 birds and 1 mammal. While the developed portions of campus are likely to be populated by urban-adapted wildlife species, such as Virginia western fence lizard (*Sceloporus occidentalis*), opossum (*Didelphis virginiana*), raccoon (*Procyon lotor*), and black phoebe (*Sayornis nigricans*), data maintained by Cal Poly Pomona indicates a rich diversity of wildlife species are present or expected to occur on campus, including 100 bird species, 4 amphibians, 16 reptiles, and 38

mammals (Cal Poly Pomona 2024b; Moriarty 1998). These species are most likely to be found in the natural and naturalized habitats in the northern and western portions of the main campus.

Special-status plant and wildlife species known or with a potential to occur in the study area are discussed in Section 4.4.1.4 and Section 4.4.1.5, respectively.

4.4.1.4 Special-Status Plant Species

Endangered, rare, or threatened plant species as defined in Section 15380(b) of the CEQA Guidelines (14 CCR 15000 et seq.) are referred to as "special-status plant species" and, as used in this analysis, include (1) plant species that are listed or proposed for listing as endangered or threatened under the federal Endangered Species Act (FESA) (CDFW 2024a); plant species that are listed or are candidates for listing as endangered or threatened under the California Endangered Species Act (CESA) (CDFW 2024a); and/or (2) plant species with a CRPR of 1 or 2 as designated by CNPS (2024b). Species with a CRPR of 3 or 4 generally do not qualify for protection under CEQA; therefore, they are not considered special-status and impacts to these species are not analyzed.

No special-status plant species were detected during reconnaissance surveys conducted in November 2024 and no designated critical habitats for federally listed plants are present in the study area (USFWS 2024a). There are 44 special-status plant species with occurrence records in the proposed Master Plan vicinity (i.e., within the USGS San Dimas 7.5-minute quadrangle and eight surrounding quadrangles) or that are included in the IPaC report for the study area (CDFW 2024b; CNPS 2024b; USFWS 2024a). For each of these special-status plant species, a determination was made regarding the potential for the species to occur within the study area based on the species' known range, habitat associations, preferred soil substrate, life form, elevation, and blooming period, as well as site-specific information gathered during the field reconnaissance, such as the location of the site, vegetation communities and soils present, and current site conditions. The results of this assessment are presented Appendix C and summarized below.

Species Known or with Potential to Occur On Site

Those special-status species not expected or with a low potential to occur within the proposed Master Plan study area are not analyzed further in this EIR, with the exception of species listed under CESA or FESA; federally and/or state listed species determined to have a low potential to occur are analyzed due to their sensitivity status.

No special-status plant species were detected during a reconnaissance survey conducted in November 2024. Six special-status plant species were determined to have a moderate or high potential to occur within the proposed Master Plan study area, as summarized below. Slender-horned spineflower (*Dodecahema leptoceras*) was determined to have a low potential to occur but is included in the evaluation of potential impacts in this EIR due to its sensitivity status (listed as federally and state endangered).:

- intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*) (CRPR 1B.2)
- Parry's spineflower (*Chorizanthe parryi* var. *parryi*) (CRPR 1B.1)
- many-stemmed dudleya (*Dudleya multicaulis*) (CRPR 1B.2)
- mesa horkelia (*Horkelia cuneata* var. *puberula*) (CRPR 1B.1)
- white rabbit-tobacco (*Pseudognaphalium leucocephalum*) (CRPR 2B.2)
- chaparral ragwort (*Senecio aphanactis*) (CRPR 2B.2)
- slender-horned spineflower (*Dodecahema leptoceras*) (federally endangered, state endangered, and CRPR 1B.1)

These species are discussed below and potential impacts to these species are evaluated in Section 4.4.4, Impact Analysis. Those special-status species not expected or with a low potential to occur within the proposed Master Plan study area are not analyzed further in this EIR.

Within the study area, each of the special-status plant species, if present, would occur only in the open space areas in the northwestern and western portions of campus. None of these species is expected to occur in the developed portions of campus or in the agricultural fields, orchards, and vineyards within the study area. Intermediate mariposa-lily has been documented on campus and has a high potential to occur in the Voorhis Ecological Reserve; suitable habitats for this species include rocky soils within coastal scrub, chaparral and grassland. All the special-status plant species with a moderate potential to occur could be present in the scrub and chaparral communities. Mesa horkelia, chaparral ragwort, and slender-horned spineflower could also occur in woodland communities, with the latter typically in sandy soils. White rabbit-tobacco may also occur in woodland and riparian communities. Parry's spineflower may also occur in woodland and grassland communities. Many-stemmed dudleya may also occur in grassland communities.

4.4.1.5 Special-Status Wildlife Species

Endangered, rare, or threatened wildlife species as defined in CEQA Guidelines, Section 15380(b) (14 CCR 15000 et seq.), are referred to as "special-status wildlife species" and, as used in this report, include (1) wildlife species listed or proposed for listing under FESA (CDFW 2024c); wildlife species that are listed or are candidates for listing as endangered or threatened under the CESA (CDFW 2024c); (2) California Species of Special Concern as designated by CDFW (2024c); and (3) wildlife species that are fully protected species as described in the California Fish and Game Code, Sections 3511, 4700, 5050, and 5515 (CDFW 2024d).

There are 46 special-status wildlife species with occurrence records in the proposed Master Plan vicinity (i.e., within the USGS San Dimas 7.5-minute quadrangle and eight surrounding quadrangles) or that are included in the IPaC report for the study area (CDFW 2024b; CNPS 2024b; USFWS 2024a). In addition, according to Cal Poly Pomona, five special-status wildlife species not included in the aforementioned database queries are known or suspected to occur on campus: Townsend's big-eared bat (*Corynorhinus townsendii*), loggerhead shrike (*Lanius ludovicianus*), mountain lion (*Puma concolor*); northern harrier (*Circus cyaneus*), and Vaux's swift (*Chaetura vauxi*) (Cal Poly Pomona 2024b; Moriarty 1998). For each of these special-status wildlife species, a determination was made regarding potential to occur within the study area based on the species' known range, habitat preferences, and knowledge of the species' distribution in the area, as well as site-specific information gathered during the field reconnaissance, such as the location of the site, vegetation communities and soils present, and current site conditions. The results of this assessment are presented in Appendix C and summarized below.

Species Known or with Potential to Occur on Site

One special-status wildlife species was detected during a reconnaissance survey conducted in November 2024: vermilion flycatcher (*Pyrocephalus rubinus*). The study area does not contain suitable desert riparian habitat to support nesting for this species and it is expected to only occur occasionally on site as a transient to forage. A total of 14 special-status wildlife species are known or were determined to have a moderate or high potential to occur within the study area. These species are discussed below and potential impacts to these species are evaluated in Section 4.4.4, Impact Analysis. Those special-status species not expected or with a low potential to occur in the study area are not analyzed further in this EIR.

Special-Status Reptiles

Southern California legless lizard (*Anniella stebbinsi*), San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*), red diamondback rattlesnake (*Crotalus ruber*), Blainville's horned lizard (*Phrynosoma blainvillii*), and coast patch-nosed snake (*Salvadora hexalepis virgultea*) are California Species of Special Concern. Each of these species could occur where suitable microhabitat conditions exist in the open space areas at the northwestern and western portions of campus. Coast patch-nosed snake could occur in the coastal scrub and chaparral communities where small mammal burrows are present to support wintering. Southern California legless lizard, coastal whiptail, red diamondback rattlesnake, and Blainville's horned lizard could occur in all of the vegetation communities present in the open space areas northwest and west of the campus. Southern California legless lizard would be limited to those areas where moist, loose soils are present. Coastal whiptail could occur in dry, sparsely vegetated portions of these communities and in disturbed areas where developed portions of the campus meet the Voorhis Ecological Reserve and surrounding open space. Blainville's horned lizard would be restricted to open areas with sandy soils.

Special-Status Bird Species

Coastal California gnatcatcher (*Polioptila californica californica*) is a California Species of Special Concern and is listed as threatened under the federal Endangered Species Act (FESA). This species is a resident songbird found below 2,500 feet in elevation in Southern California. It generally prefers open sage scrub with low-growing, drought-deciduous shrubs, including California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), and sages (*Salvia* spp.) as a dominant or co-dominant species (Mock 2004). Coastal California gnatcatcher is known to occur on the Cal Poly Pomona campus, with historical and recent observations of the species in the Voorhis Ecological Reserve and in suitable habitats adjacent to the campus (CDFW 2024b; eBird 2024; Moriarty 1998). Coastal California gnatcatcher is likely a year-round resident and has a high potential to nest in the coastal scrub habitats of the Voorhis Ecological Reserve.

Four avian species have a moderate potential to occur in the study area, including burrowing owl (*Athene cunicularia*), white-tailed kite (*Elanus leucurus*), loggerhead shrike (*Lanius ludovicianus*), and yellow warbler (*Setophaga petechia*), as further described herein.

Burrowing owl is a candidate for listing as under CESA and is afforded the protection of CESA while the California Fish and Game Commission decides if listing the species is warranted. In California, burrowing owls are year-long residents of open, dry grassland and desert habitats, as well as grass, forb, and open shrub stages of pinyon-juniper and ponderosa pine habitats (Zeiner et al. 1990). Preferred habitat is generally typified by short, sparse vegetation with few shrubs, level to gentle topography, and well-drained soils (Haug et al. 1993). According to Allen et al. (2016), breeding activity in Los Angeles County is mainly confined to the Antelope Valley; however, wintering and transient birds are occasionally seen in coastal locations of Los Angeles County and Ventura County and the Cal Poly Pomona campus is at the eastern edge of Los Angeles County, in close proximity to the western extent of the burrowing owl breeding range.

The presence of burrows is the most essential component of burrowing owl habitat as they are required for nesting, roosting, cover, and catching prey (Coulombe 1971; Martin 1973; Green and Anthony 1989; Haug et al. 1993). In California, western burrowing owls most commonly live in burrows created by California ground squirrels, which were detected on campus during a reconnaissance survey in November 2024. Burrowing owls may occur in human-altered landscapes such as agricultural areas, ruderal grassy fields, vacant lots, and pastures if the vegetation structure is suitable (i.e., open and sparse), useable burrows are available, and foraging habitat occurs in close proximity (Gervais et al. 2008). Debris piles, riprap, culverts, and pipes can be used for nesting and roosting.

Although this species has not been detected on campus previously, burrowing owl could occur (nesting and wintering) in suitable grass and forb dominated communities within the southwestern portion of the study area and in the agricultural fields in the southern and eastern portion of the study area.

White-tailed kite is a California fully protected species. This species is known to occur on the Cal Poly Pomona campus (CDFW 2024b; eBird 2024; Moriarty 1998; Moriarty, pers. comm., 2011). This species nests in woodlands, riparian areas, and individual trees near open lands; it forages opportunistically in grassland, meadows, scrubs, agriculture, emergent wetland, savanna, and disturbed lands. This species may use all of the open space areas in the northwestern and western portions of campus for foraging. Nesting potential is limited to the woodland areas north of the core campus and large trees near suitable foraging areas.

Loggerhead shrike and yellow warbler are California Species of Special Concern. Both of these species are known to occur on the Cal Poly Pomona campus (CDFW 2024b; eBird 2024; Moriarty 1998; Moriarty, pers. comm., 2011). Loggerhead shrike could nest wherever scattered trees or shrubs are present in the Voorhis Ecological Reserve and adjacent open space areas. Yellow warbler could nest in the riparian woodland communities in and adjacent to the Voorhis Ecological Reserve.

Special-Status Mammals

Pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumops perotis californicus*), and San Diego desert woodrat (*Neotoma lepida intermedia*) are California Species of Special Concern. Large rock outcrops and caves, which are absent from the Cal Poly Pomona campus, are typically preferred by pallid bat for roosting, although this species can nest in trees and human-made structures. Western mastiff bats are known to roost in crevices found in cliff faces, rock outcrops, and tall buildings. Mature trees in the open space and developed portions of the campus, as well as buildings and other human-made structures on campus, may provide roosting sites for both of these species. Desert woodrats are found in a variety of shrub and desert habitats, primarily associated with rock outcroppings, boulders, cacti, or areas of dense undergrowth (Bleich 1973; Bleich and Schwartz 1975; Brown et al. 1972; Cameron and Rainy 1972; Thompson 1982). On the Cal Poly Pomona campus, this species could occur in the coastal scrub and chaparral vegetation present northwest and west of the core campus.

Special-Status Invertebrates

Crotch's bumble bee is a candidate for listing as endangered under CESA and is afforded the protection of CESA while the California Fish and Game Commission decides if listing the species is warranted. This species was not detected during the reconnaissance survey conducted in November 2024, but there are recent observations of this species on the Cal Poly Pomona campus (iNaturalist 2024). Crotch's bumble bee is a generalist forager and could forage wherever suitable floral resources are present in the campus's open space vegetation communities. The scrub, chaparral, woodland, riparian communities also have the potential to support nesting sites for this species, which are primarily located underground in abandoned holes made by ground squirrels, mice, and rats, but may be above ground in abandoned bird nests or empty cavities (Osborne et al. 2008, Williams et al. 2014). Nesting could occur in all but the developed portions of campus, where suitable nesting substrates are present.

Critical Habitat

Approximately 127.6 acres of designated critical habitat for the federally threatened coastal California gnatcatcher is present in the area, corresponding approximately with the Voorhis Ecological Reserve (Figure 4.4-2; USFWS 2024a).

4.4.1.6 Potential Jurisdictional Wetlands and Waters

Based on a desktop review, including the USFWS National Wetland Inventory (NWI) (USFWS 2024b) and current and historical aerial imagery, several unnamed ephemeral drainages are present in the open space areas northwest of the core campus, within the Voorhis Ecological Reserve. Thompson Wash, which consists of a concrete lined channel, is located immediately south of South Campus Drive and traverses a portion of campus near Innovation Village. South San Jose Creek parallels Thompson Wash to the southeast and is adjacent to the railroad line. A pond is located on the north side of University Drive, in front of La Cienega Center. Finally, the campus maintains an uncovered reclaimed water reservoir, situated approximately 800 feet northwest of Parking Lot M, just west of the Voorhis Ecological Reserve.

South San Jose Creek, to which Thompson Wash is tributary, flows into the San Gabriel River, which is a relatively permanent water. As such, both South San Jose Creek and Thompson Wash are likely regulated as waters of the United States by the U.S. Army Corps of Engineers (USACE), as waters of the state by the Regional Water Quality Control Board (RWQCB), and as a jurisdictional streambed by CDFW under Section 1602 of the California Fish and Game Code.

The ephemeral drainages present in the Voorhis Ecological Reserve are not likely subject to USACE jurisdiction because these features are isolated, do not meet the relatively permanent standard as a water of the United States, and do not appear to maintain a continuous surface connection to any relatively permanent waters. These ephemeral features, as well as the pond and uncovered reservoir may be regulated as waters of the state by the RWQCB and, along with any associated riparian vegetation, as jurisdictional streambeds by CDFW under Section 1602 of the California Fish and Game Code. It is important to note that the ultimate decision regarding regulatory jurisdiction, and the extent of that jurisdiction, is made by the resource agencies (i.e., USACE, CDFW, and RWQCB) when a formal delineation of potentially jurisdictional aquatic resources is conducted at the time that individual projects are pursued. Section 4.4.2, Regulatory Setting, provides additional information about jurisdictional wetlands and waters.

4.4.1.7 Wildlife Corridors and Habitat Linkages

Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. Wildlife corridors contribute to population viability by ensuring continual exchange of genes between populations, providing access to adjacent habitat areas for foraging and mating, and providing routes for recolonization of habitat after local extirpation or ecological catastrophes (e.g., fires).

Habitat linkages are small patches that join larger blocks of habitat and help reduce the adverse effects of habitat fragmentation. Habitat linkages provide a potential route for gene flow and long-term dispersal of plants and animals and may also serve as primary habitat for smaller animals, such as reptiles and amphibians. Habitat linkages may be continuous habitat or discrete habitat islands that function as steppingstones for dispersal.

The Cal Poly Pomona campus does not overlap any designated wildlife corridors or habitat linkages identified in the South Coast Missing Linkages analysis conducted by South Coast Wildlands (2008), nor is it within any “essential connectivity areas,” identified by the California Essential Habitat Connectivity (CEHC) Project (Spencer et al. 2010). In addition, CDFW has mapped the lands where the Cal Poly Pomona campus is located as Rank 1, which refers to areas where land use may limit options for providing connectivity (e.g., agriculture, urban) or no connectivity importance has been identified in models (CDFW 2019a). The Frank G. Bonelli Regional Park, located across I-10, north of the Cal Poly Pomona campus was identified as a “natural landscape block” in the CEHS Project, defined

as a block of natural habitat that supports native biodiversity, and a large variety of native wildlife and plants are known from this park. However, this area is completely surrounded by development and isolated from other natural habitat blocks. Terrestrial movement between the Cal Poly Pomona campus and Frank G. Bonelli Park is also severely limited by I-10 and SR 57, both of which wildlife would have to cross to move between the two spaces.

The Cal Poly Pomona campus is situated southwest of the intersection of several major highways, including I-10 to the north and SR 57 to the east, both of which act as major barriers to regional wildlife movement. Wildlife movement is further constrained by the dense residential, commercial, and industrial land uses immediately surrounding the campus which significantly limit wildlife movement opportunities between the study area and open space areas surrounding the Los Angeles basin. The 77-acre Voorhis Ecological Reserve, located in the northwest portion of campus, serves as live-in habitat for a variety of native plants and wildlife and likely facilitates local movement between the campus and the contiguous open space areas in the San Jose Hills to the west of campus. While additional open space is present in the proposed Master Plan vicinity, associated with the Puente Hills and Chino Hills, approximately 5 miles south of campus, the density of development, particularly along Valley Boulevard, as well as another major highway (SR 60), preclude movement between campus and these larger spaces.

For the above reasons, the Cal Poly Pomona campus does not currently function as a wildlife corridor or habitat linkage.

4.4.2 Regulatory Setting

4.4.2.1 Federal

Federal Endangered Species Act

The federal Endangered Species Act (FESA) of 1973 (16 USC 1531 et seq.), as amended, is administered by the U.S. Fish and Wildlife Service (USFWS) for most plant and animal species, and by the National Oceanic and Atmospheric Administration National Marine Fisheries Service for certain marine species. FESA serves as the enacting legislation to list, conserve, and protect threatened and endangered species, and the ecosystems on which they depend, from extinction. In addition, for those wildlife species listed as federally endangered, FESA provides for the ability to designate critical habitat, defined as that habitat considered "essential to the conservation of the species" and that "may require special management considerations or protection." FESA Section 9(a)(1)(B) prohibits the taking, possession, sale, or transport of any endangered fish or wildlife species. "Take" is defined to mean "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct" (16 USC 1532 [19]). With respect to any endangered species of plant, Sections 9(a)(2)(A) and 9(a)(2)(B) prohibit the possession, sale, and import or export of any such species, and prohibits any action that would "remove and reduce to possession any such species from areas under federal jurisdiction; maliciously damage or destroy any such species on any such area; or remove, cut, dig up, or damage or destroy any such species on any other area in knowing violation of any law or regulation of any State or in the course of any violation of a State criminal trespass law." FESA allows for the issuance of incidental take permits for listed species under Section 7, which is generally available for projects that also require other federal agency permits or other approvals, and under Section 10, which provides for the approval of habitat conservation plans on private property without any other federal agency involvement.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) regulates or prohibits taking, killing, possession of, or harm to migratory bird species listed in Title 50, Section 10.13 of the Code of Federal Regulations. The MBTA is an international treaty for the conservation and management of bird species that migrate through more than one country and is enforced in the United States by the U.S. Fish and Wildlife Service. Hunting of specific migratory game birds is permitted under the regulations listed in Title 50, Section 20 of the Code of Federal Regulations. The MBTA was amended in 1972 to include protection for migratory birds of prey (raptors). Between December 2017 and October 2021, several rules and opinions were issued by various federal agencies regarding the prohibitions of the MBTA. On December 22, 2017, the Department of Interior issued a legal opinion (M-Opinion 37050) that interpreted the above prohibitions as applying only to direct and purposeful actions of which the intent is to kill, take, or harm migratory birds, their eggs, or their active nests; the incidental take of birds, eggs, or nests that are not the purpose of such an action, even if there are direct and foreseeable results, was not prohibited. On January 7, 2021, the USFWS published a final rule (the January 7th rule) that codified this interpretation. On October 4, 2021, the USFWS published a final rule (which went into effect on December 3, 2021) revoking the January 7 rule and confirming the MBTA's jurisdiction over incidental take: "the immediate effect of this final rule is to return to implementing the MBTA as prohibiting incidental take and applying enforcement discretion, consistent with judicial precedent and longstanding agency practice prior to 2017" (86 FR 54642).

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (BGEPA) (16 USC 668 et seq.) provides for the protection of both bald and golden eagles and prohibits the take, possession, and transportation of these species except pursuant to federal regulations. The BGEPA defines "take" as any action that would "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, destroy, molest, or disturb" bald and golden eagles, including parts, nests, or eggs. The term "disturb" is defined as "to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior." (50 CFR 22.6). Under BGEPA, it is also illegal to "sell, purchase, barter, trade, import, or export, or offer for sale, purchase, barter, or trade, at any time or in any manner, any bald eagle or any golden eagle, or the parts, nests, or eggs" of these birds (50 CFR 22.12).

Pursuant to 50 CFR 22.26, an amendment to BGEPA was published in December 2016, allowing for a permit to be obtained that authorizes take of bald eagles and golden eagles where the take is "compatible with the preservation of the bald eagle and the golden eagle; is necessary to protect an interest in a particular locality; is associated with, but not the purpose of, the activity; and cannot practicably be avoided." In February 2024, the latest amendment to the BGEPA (89 FR 9920–9965) revised the regulations for the issuance of permits for eagle incidental take and eagle nest take. These regulations provided a number of revisions including creating general permit options for qualifying wind-energy generation projects, power line infrastructure, activities that may disturb breeding bald eagles, and bald eagle nest take. The general permit options are intended to "simplify and expedite the permitting process for activities that have relatively consistent and low risk to eagles and well-established avoidance, minimization, and compensatory mitigation measures." Projects that do not meet the eligibility criteria for general permits may still apply for specific permits. The revised regulations created a tier structure within specific permits with tier levels related to the complexity of the project. In addition, the regulations provide allowances for fulfilling compensatory mitigation requirements through the purchase of "eagle credits" from USFWS approved in lieu fee programs and conservation banks that will be authorized for particular Eagle Management Units. Other revisions

include narrowing the definition of ‘‘eagle nest’’ to exclude nest structures on nesting substrates that fail due to natural circumstances, such as a fallen tree, which result in a nest structure that will no longer and never again be functional or used by eagles; revising the definition for ‘in-use nest’’ to clarify that the eggs in an “in-use nest” must be viable and do not include non-viable eggs that are present, for example, in an alternate nest outside of the breeding season; and revising permit fees.

Clean Water Act

The objective of the Clean Water Act (CWA) is to restore and maintain the chemical, physical, and biological integrity of the nation’s waters. Section 401 requires a project operator for a federal license or permit that allows activities resulting in a discharge to waters of the United States to obtain state certification, thereby ensuring that the discharge will comply with provisions of the CWA. RWQCBs administer the certification program in California. Section 402 establishes a permitting system for the discharge of any pollutant (except dredged or fill material) into waters of the United States. Under Section 404 of the CWA, the USACE has the authority to regulate activities that could discharge fill or dredge material or otherwise adversely modify wetlands or other waters of the United States. The USACE implements the federal policy embodied in Executive Order 11990, which, when implemented, is intended to result in no net loss of wetland values or function. USACE implementing regulations are found at 33 Code of Federal Regulations (CFR) 320 and 330. Guidelines for implementation are referred to as the Section 404(b)(1) Guidelines, which were developed by the U.S. Environmental Protection Agency in conjunction with USACE (40 CFR 230).

Wetlands and Other Waters of the United States

The definition of waters of the United States establishes the geographic scope for authority under Section 404 of the CWA; however, the CWA does not specifically define waters of the United States, leaving the definition open to statutory interpretation and agency rulemaking. The definition of what constitutes “waters of the United States” (provided in 33 CFR Section 328.3(a)) has changed multiple times over the past few decades starting with the *United States v. Riverside Bayview Homes, Inc*. court ruling in 1985. Subsequent court proceedings, rule makings, and congressional acts in 2001 (*Solid Waste Agency of Northern Cook County v. United States Army Corps of Engineers*), 2006 (*Rapanos v. United States*), 2015 (Clean Water Rule), 2018 (suspension of the Clean Water Rule), 2019 (formal repeal of the Clean Water Rule), 2020 (Navigable Waters Protection Rule, NWPR), and 2021 (*Pasqua Tribe et al v. United States Environmental Protection Agency* resulting in remand and vacatur of the NWPR and a return to “the pre-2015 regulatory regime”) have attempted to provide greater clarity to the term and its regulatory implementation. On December 30, 2022, the agencies announced the final Revised Definition of “Waters of the United States” rule (Rule) (88 CFR 3004–3144). The Rule was published in the Federal Register on January 18, 2023, and became effective on March 20, 2023, restoring federal jurisdiction over waters that were protected prior to 2015 under the Clean Water Act for traditional navigable waters, the territorial seas, interstate waters, and upstream water resources that significantly affect those waters. The Rule represents a re-expansion of federal jurisdiction over certain water bodies and wetlands previously exempt pursuant to the 2020 Navigable Waters Protection Rule. The Rule also considers various subsequent court decisions including two notable Supreme Court decisions.

There are two key changes that the Rule incorporates. Firstly, the Rule reinstates the “Significant Nexus” test. The “Significant Nexus” test refers to waters that either alone, or in combination with similarly situated waters in the region, significantly affect the chemical, physical, or biological integrity of traditional navigable waters, interstate waters, or the territorial seas (86 FR 69372-69450). The “Significant Nexus” test attempts to establish a scientific connection between smaller water bodies, such as ephemeral or intermittent tributaries, and larger, more

traditional navigable waters such as rivers. Significant nexus evaluations take into consideration hydrologic and ecologic factors including, but not limited to, volume, duration, and the frequency of surface water flow in the resource and its proximity to a traditional navigable water, and the functions performed by the resource on adjacent wetlands. Second, the Rule adopts the "Relatively Permanent Standard" test. To meet the "Relatively Permanent Standard" water bodies must be relatively permanent, standing, or continuously flowing and have a continuous surface connection to such waters.

On May 25, 2023, the Supreme Court issued its long-anticipated decision in Sackett v. EPA., in which it rejected the EPA's claim that "waters of the United States," as defined in the CWA, includes wetlands with an ecologically significant nexus to traditional navigable waters. The Supreme Court held that only those wetlands with a continuous surface water connection to traditional navigable waterways would be afforded federal protection under the CWA. Specifically, to assert jurisdiction over an adjacent wetland under the CWA, a party must establish that (1) the adjacent body of water constitutes water[s] of the United States (i.e., a relatively permanent body of water connected to traditional interstate navigable waters), and (2) the wetland has a continuous surface connection with that water, making it difficult to determine where the water ends and the wetland begins.

On August 29, 2023, the EPA and USACE announced the final rule amending the 2023 definition of "waters of the United States," conforming with the Sackett v. EPA decision. Some of the key changes include removing the Significant Nexus test from consideration when identifying tributaries and other waters as federally protected and revising the adjacency test when identifying federally jurisdictional wetlands. Under the EPA's new "waters of the United States" definition, a "waters of the United States" is a relatively permanent, standing, or continuously flowing body of water that has an apparent surface connection to a "traditionally navigable water" to fall within federal purview. The new rule applies to wetlands and streams throughout the U.S. Although the Sackett opinion did not specifically reference streams, the EPA's new rule extends the "continuous surface connection" standard to streams, thereby removing non-permanent, ephemeral streams that do not meet these standards from federal jurisdiction.

The term "wetlands" (a subset of waters of the United States) is defined in 33 CFR, Section 328.3(c)(16), as "areas that are inundated or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." In the absence of wetlands, the limits of USACE jurisdiction in non-tidal waters, such as intermittent streams, extend to the "ordinary high water mark," which is defined in 33 CFR 328.3(c)(7) as "that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas."

4.4.2.2 State

California Endangered Species Act

CDFW administers the California Endangered Species Act (CESA), which prohibits the take of plant and animal species designated by the Fish and Game Commission as endangered or threatened in California. Take under CESA is defined as any of the following: "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" (California Fish and Game Code Section 86). Species determined by the State of California to be candidates for listing as threatened or endangered are treated as if listed as threatened or endangered and, therefore, are also protected from take. In addition, CESA stipulates that state agencies may not approve projects that will "jeopardize

the continued existence of any endangered species or threatened species, or result in the destruction or adverse modification of habitat essential to the continued existence of those species, if there are reasonable and prudent alternatives available consistent with conserving the species or its habitat which would prevent jeopardy" (California Fish and Game Code Section 2053).

Take authorization for otherwise lawful activities may be obtained from CDFW under Section 2081 of the California Fish and Game Code.

California Fish and Game Code

Fully Protected Species

Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code identify fish, amphibian and reptile, bird, and mammal species, respectively, designated as fully protected in California. Species that are fully protected by these sections may not be taken or possessed at any time. CDFW cannot issue permits or licenses that authorize the "take" of any fully protected species, except under certain circumstances, such as scientific research and live capture and relocation of such species pursuant to a permit for the protection of livestock.

Lake and Streambed Alteration Program

Under Sections 1600–1616 of the California Fish and Game Code, CDFW regulates activities that would alter the flow, bed, channel, or bank of streams and lakes. Such activities require a Lake and Streambed Alteration Agreement, issued by CDFW in accordance with Section 1602 of the California Fish and Game Code. The limits of CDFW's jurisdiction are defined in the code as the "bed, channel or bank of any river, stream, or lake designated by the department in which there is at any time an existing fish or wildlife resource or from which these resources derive benefit" (California Fish and Game Code Section 1601). In practice, CDFW usually marks its jurisdictional limit at the top of the stream or bank, or at the outer edge of the riparian vegetation, whichever is wider.

Nesting Birds

Section 3503 of the California Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nests or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.5 protects all birds of prey (raptors) and their eggs and nests. Section 3511 states that fully protected birds or parts thereof may not be taken or possessed at any time. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA, except as provided by rules and regulations adopted by the United States Secretary of the Interior under the MBTA. Assembly Bill Number 454 (AB 454; California Migratory Bird Protection Act), amended Section 3513 to prohibit take or possession of any migratory non-game bird as designated in the MBTA prior to 2017, except as provided by rules and regulations adopted by the United States Secretary of the Interior under the MBTA before January 1, 2017, or subsequent rules or regulations adopted pursuant to the MBTA, unless those rules or regulations are inconsistent with California Fish and Game Code. ABA 454 became operative on January 1, 2020, and will become inoperative on January 20, 2025, at which time the original provisions of Section 3513 would be reenacted.

California Native Plant Protection Act

The Native Plant Protection Act of 1977 (see Section 1900 et seq. of the California Fish and Game Code) directed CDFW to carry out the legislature's intent to "preserve, protect and enhance rare and endangered plants in this

State." The Native Plant Protection Act gave the California Fish and Game Commission the power to designate native plants as "endangered" or "rare" and protect endangered and rare plants from take. CESA expanded on the original Native Plant Protection Act and enhanced legal protection for plants, but the Native Plant Protection Act remains part of the California Fish and Game Code. To align with federal regulations, CESA created the categories of "threatened" and "endangered" species. It converted all "rare" wildlife into the act as threatened species but did not do so for rare plants. Thus, there are three listing categories for plants in California: rare, threatened, and endangered. Because rare plants are not included in CESA, mitigation measures for impacts to rare plants are specified in a formal agreement between CDFW and the project proponent.

California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires identification of a project's potentially significant impacts on biological resources and feasible mitigation measures and alternatives that could avoid or reduce significant impacts. CEQA also provides guidelines and thresholds for use by lead agencies for evaluating the significance of potential impacts.

Special-Status Plants and Wildlife

The CEQA Guidelines define endangered wildlife or plants as species or subspecies whose "survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors" (14 CCR 15380[b][1]). A rare animal or plant is defined in CEQA Guidelines Section 15380(b)(2) as a species that, although not currently threatened with extinction, exists "in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or … [t]he species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered 'threatened' as that term is used in the federal Endangered Species Act." Additionally, an animal or plant may be presumed to be endangered, rare, or threatened if it meets the criteria for listing as defined further in CEQA Guidelines Section 15380(c).

Special-Status Vegetation Communities

Section IV, Appendix G (Environmental Checklist Form) of the CEQA Guidelines (14 CCR 15000 et seq.) requires an evaluation of impacts to "any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or the USFWS."

4.4.3 Thresholds of Significance and Methodology

4.4.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section15064.7). The significance criteria used to evaluate the proposed Master Plan impacts to

biological resources are based on CEQA Guidelines Appendix G. For the purposes of this project, a potentially significant impact to biological resources would occur if the proposed Master Plan would:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

4.4.3.2 Methodology

Site Assessment

A literature review and a reconnaissance field survey were conducted to identify biological resources present or potentially present in the study area and to analyze potential impacts to those biological resources as a result of the proposed Master Plan.

Literature Review

Prior to conducting field investigations, pertinent literature was reviewed to aid in evaluating the environmental conditions and identify special-status biological resources potentially occurring in the study area. The California Natural Diversity Database (CNDDB) (CDFW 2024b) and CNPS Rare Plant Inventory (CNPS 2024b) were queried based on the U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle map for San Dimas, California where the proposed Master Plan area is located, as well as the surrounding eight USGS 7.5-minute quadrangle maps (i.e., Prado Dam, Ontario, Mt. Baldy, Baldwin Park, Azusa, Glendora, La Habra, and Yorba Linda) for documented special-status plant and wildlife species in the vicinity of the Cal Poly Pomona campus. General information regarding vegetation communities was obtained from A Manual of California Vegetation (CNPS 2024a). The potential for jurisdictional waters to be present was assessed using aerial photographs (Google 2024; NETR 2024), the USGS San Dimas 7.5-minute topographic quadrangle map (USGS 2021), and the USFWS National Wetland Inventory (NWI) (USFWS 2024b). Additional data sources reviewed to aid in the assessment of biological resources include:

- CDFW California Wildlife Habitat Relationships Life History Accounts and Range Maps (CDFW 2024e)

- USFWS Information for Planning and Conservation System (IPaC) (USFWS 2022a)
- U.S. Department of Agriculture, Natural Resources Conservation Service Web Soil Survey (USDA 2024a)
- South Coast Missing Linkages analysis conducted by South Coast Wildlands (2008)
- California Essential Habitat Connectivity (CEHC) project: A Strategy for Conserving a Connected California (Spencer et al. 2010)

Information regarding biological resources previously observed or known to occur on the Cal Poly Pomona campus was obtained through a review of the Final Program Environmental Impact Report for Campus Master Plan 2000 (Cal Poly Pomona 2000), personal communications between the Cal Poly Pomona Biological Sciences Department and Dudek staff (Moriarty, pers. comm., 2011), and lists of plant and wildlife species maintained by Cal Poly Pomona (Cal Poly Pomona 2024a, 2024b).

Reconnaissance Survey

After a review of pertinent literature, Dudek biologists conducted a reconnaissance survey of the campus on November 27, 2024. All plant and wildlife species encountered during the reconnaissance survey were identified and recorded. Vegetation communities and land uses within the study area were mapped in the field using the Environmental Systems Research Institute (Esri) Collector, a mobile data collection application, on a digital aerial-based background (Esri 2023). Following completion of the fieldwork, all vegetation linework was finalized using Esri ArcGIS software and GIS coverage was created. Once in ArcGIS, the acreage of each vegetation community and land cover type within the study area was determined.

Vegetation communities were mapped using A Manual of California Vegetation, Online Edition (CNPS 2024a) and CDFW's California Natural Community List (CDFW 2023), where feasible, with modifications made to accommodate the lack of conformity of the observed communities (e.g., developed/disturbed land cover types) using Oberbauer et al. (2008). In accordance with state mapping standards (CDFW 2022), biologists generally employed a minimum mapping unit of 1 acre for upland communities not considered sensitive, and 0.25 acres for wetland, riparian, or sensitive vegetation communities. As described in CDFW's Survey of California Vegetation (2022), smaller minimum mapping units may be used in order to appropriately assess the potential for impacts to sensitive resources, such as with communities that support unique resources that may be used by sensitive wildlife. Each natural community was mapped to the association level, where feasible. Sensitive vegetation communities—those communities identified as high priority for inventory in the California Natural Community List (CDFW 2023) by a state rarity ranking of S1, S2, or S3—were documented wherever present within the study area.

Definition of Impacts

Direct Impacts

Direct impacts refer to the effects caused by the project and which occur at the same time and place (CEQA Guidelines, Section 15358). For the purposes of the proposed Master Plan, potential direct impacts include those impacts to biological resources that could occur during clearing, grading, and/or construction of structures and that would occur within the impact footprint.

Indirect Impacts

Indirect impacts refer to reasonably foreseeable effects caused by the project and which are later in time or farther removed in distance (CEQA Guidelines, Section 15358). For the purposes of the proposed Master Plan, potential

indirect impacts include those impacts that could occur during clearing, grading, and/or construction of structures but which would affect biological resources outside of the proposed impact footprint (i.e., short-term construction-related indirect impacts) or those impacts caused by project implementation after the completion of construction (i.e., long-term, or operational, indirect impacts).

Project Design Features

In addition, as stated in Chapter 3, Project Description, the following Project Design Features (PDFs) are part of the proposed Master Plan and included in the analytical assumptions for purposes of impact determinations (see Chapter 3, Project Description for the specific text of each applicable PDF). The PDFs will be incorporated into the Master Plan's Mitigation Monitoring and Reporting Program that will be adopted by the CSU Board of Trustees when they consider approval of the proposed Master Plan:

- PDF-BIO-1: Tree preservation
- PDF-HWQ-1: Project-specific best management practices (BMPs)
- PDF-HWQ-2: Stormwater management practices
- PDF-HWQ-3: Runoff to pre-development conditions

4.4.4 Impact Analysis

4.4.4.1 Issues Not Further Evaluated

The proposed Master Plan would have no impact with respect to the following thresholds of significance and therefore these topics are not further evaluated:

- **Local Policies or Ordinances Protecting Biological Resources.** As discussed in Section 4, Environmental Analysis, Cal Poly Pomona is not subject to local government planning or ordinances, such as the general plans and ordinances for the City of Pomona, City of Walnut, or the County of Los Angeles. Nevertheless, the proposed Master Plan seeks to preserve all native and mature trees and, as such, will implement PDF-BIO-1 as part of the proposed Master Plan, which will result in the preservation of many native and mature trees in place and the replacement of native and mature trees that are directly or indirectly impacted during proposed Master Plan implementation. Therefore, the proposed Master Plan would not conflict with any local policies or ordinances protection biological resources and there is **no impact**.
- **Conflict with Habitat Conservation Plan or Natural Community Conservation Plan.** The Cal Poly Pomona campus is not within any habitat conservation plan (HCP), natural community conservation plan (NCCP), or other approved local, regional, or state HCP (CDFW 2019b). Therefore, the proposed Master Plan would not conflict with any provisions of adopted HCPs, NCCPs, or other approved local, regional, or state HCPs and there is **no impact**.

4.4.4.2 Project Impacts

Impact 4.4-1 The project could have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. (Potentially Significant)

Six special-status plant species have at least a moderate potential to occur in the study area: intermediate mariposa-lily, Parry's spineflower, many-stemmed dudleya, mesa horkelia, white rabbit-tobacco, and chaparral ragwort. Slender-horned spineflower has a low potential to occur on campus but is included in this analysis due to its sensitivity status. A total of 14 special-status wildlife species have at least a moderate potential to occur in the study area, including 5 bird species (burrowing owl, white-tailed kite, loggerhead shrike, coastal California gnatcatcher, and yellow warbler), 5 reptiles (Southern California legless lizard, San Diegan tiger whiptail, red diamondback rattlesnake, Blainville's horned lizard, and coast patch-nosed snake), 3 mammals (pallid bat, western mastiff bat, and San Diego desert woodrat), and 1 invertebrate (Crotch's bumble bee). In addition, designated critical habitat for coastal California gnatcatcher is present in the northwestern portion of the campus, approximately in the location of the Voorhis Ecological Reserve (Figure 4.4-2).

With the exception of burrowing owl and special-status bats, potentially suitable habitat for each of these special-status species is largely limited to portions of the open space areas in the northwestern and western portions of the study area where suitable conditions exist. In addition to the grasslands in the hills on the west side of campus, burrowing owl may breed and winter in the agricultural fields in the eastern portions of the study area. Special-status bat species, including pallid bat and western mastiff bat, could roost in buildings and mature trees throughout the study area, including mature trees located in the developed portions of the campus; none of the other special-status plant or wildlife species is expected to occur in the developed portions of the campus.

In addition to the special-status species mentioned above, the Cal Poly Pomona campus has the potential to support the nesting activities of bird species protected by California Fish and Game Code and by the federal MBTA. These bird species could nest in buildings, trees, and landscape vegetation throughout the developed portions of the campus, as well as in the open space areas on campus.

Program-Level Analysis for the Master Plan

Direct Impacts

The significance of direct impacts to special-status plant species is evaluated based on the loss of individuals. The significance of direct impacts to special-status wildlife species is evaluated based on the loss of suitable habitat and the potential for impacts to individuals through injury or mortality during construction. As described in Section 3, Project Description, the primary strategies for implementing the proposed Master Plan include renovation of existing buildings (renovation), demolition and replacement of existing buildings in the same general physical location (replacement), minimal construction of new buildings at the core of campus (new construction) and leaving most buildings in their existing location and configuration (buildings to remain). As most proposed Master Plan development would occur in already-developed portions of campus, most development would not likely result in the substantial loss of potentially suitable habitat for special-status plants or wildlife species and would not result in the substantial loss of harm to individuals of these species, with the exception of special-status bats. However, the Spadra Well Waterline Extension is situated in an area that is surrounded by or adjacent to natural habitats that could support special-status species (see Figure 3-3 in Chapter 3, Project Description, and Figure 4.4-2). There are

also several proposed Master Plan development projects, such as the Bronco Student Center Conference Center, the Children's Center Replacement, and the Spadra Well Waterline Extension that are currently proposed in areas that could support breeding and/or overwintering burrowing owls. Furthermore, as project designs are finalized, additional projects may include disturbance to areas that could support special-status species. If any other Master Plan development projects were to result in the disturbance of areas where special-status species may be present, direct impacts could occur through the loss of or harm to individuals and/or the loss of habitat, should those species be present.

Reptiles are vulnerable to injury and mortality during construction because they tend to be cryptic (i.e., able to avoid detection through nocturnality, camouflage, burrowing, etc.), slow moving, and below ground or under rocks or debris during cooler periods. Similarly, because Crotch's bumble bee typically nests underground, individuals would be highly vulnerable to injury and mortality during construction, which could crush nests and individuals, if present on site. Although individual adult birds are unlikely to be directly killed or injured during construction activities because they are highly mobile and would likely leave the area during construction, construction activities could directly impact these species, as well as common species protected by California Fish and Game Code and the federal MBTA, through the destruction and/or damage of nests, which could result in injury or mortality of eggs and/or young. San Diego desert woodrat is also a mobile species; however, individual woodrats could be injured or killed during construction as a result of collisions with equipment or the destruction/damage of occupied middens.

Pallid bat and western mastiff bat could roost in buildings and some mature trees present in both the open space and developed portions of the campus. As a result, proposed Master Plan development, including but not limited to renovation, demolition, and utility improvement projects, could have the potential to directly impact special-status bats should roosts be present within the construction footprint.

Because the exact location and nature of habitat disturbance is not fully known at this time, implementation of the proposed Master Plan could result in direct impacts on all six special-status plants species and all 14 special-status wildlife species with at least a moderate potential to occur on the Cal Poly Pomona campus, and on common birds protected by California Fish and Game Code and the federal MBTA that may be nesting in areas of disturbance. These direct impacts would be **potentially significant**.

Indirect Impacts

In addition to the previously mentioned project (the Spadra Well Waterline Extension), other proposed Master Plan development could be located close enough to suitable habitat for special-status species to be indirectly impacted by short-term construction-related effects and by long-term development-related effects that could occur after construction is completed.

Short-term Indirect Effects. Short-term construction-related effects that have the potential to indirectly impact special-status plant species, as well as special-status wildlife through habitat degradation, include fugitive dust; litter; accidental clearing, grading, and trampling; and increased erosion, runoff, sedimentation, and chemical pollution. Short-term construction-related effects that have the potential to impact individuals of special-status wildlife species generally include fugitive dust; noise and vibration; construction lighting; accidental clearing and grading; increased human presence; and litter, which can lead to an increase in non-native, invasive animal species.

Excessive dust generated during construction can decrease or limit plant survivorship by decreasing photosynthetic output, reducing transpiration, and adversely affecting reproductive success, which could result in the loss of special-status plants, degrade wildlife habitat, or harm individual wildlife. Ground-disturbing construction activities

have the potential to affect plants and wildlife habitat by increasing the chance of erosion, runoff, and sedimentation. The operation and maintenance of construction equipment can increase the chance of petroleum or other chemical spills or leaks (e.g., fuels, lubricants, cleaning solutions), which can degrade nearby vegetation and harm individual wildlife. Vegetation and ground-dwelling wildlife species, including Crotch's bumble bee, San Diego desert woodrat, and special-status reptiles, could be crushed as a result of inadvertent clearing of vegetation or by construction personnel walking outside the designated disturbance footprint. Construction-related noise and vibration, which could occur from equipment used during construction activities, can have a variety of temporary indirect impacts on wildlife species, including increased stress, weakened immune systems, altered foraging behavior, displacement due to startle, degraded communication with conspecifics (e.g., masking), damaged hearing from extremely loud noises, and increased vulnerability to predators (Lovich and Ennen 2011). Construction noise and vibration may temporarily disturb bird breeding activities, potentially resulting in nest abandonment or reduced productivity, and could affect the spatial behaviors of other special-status wildlife species if present in areas near construction. Construction vibration may also temporarily disturb species that occupy burrows close to construction, including special-status reptiles and Crotch bumble bee, and may cause the collapse of occupied burrows, potentially crushing individuals. The effects of construction night lighting on wildlife include disorientation; avoidance of certain areas; disturbance of nighttime rest and sleep periods of diurnal birds; simulated increased day length, which affects reproductive cycles by triggering premature reproductive activity; and increased risk of predation. An increased human presence near wildlife habitat can disrupt daily activities of wildlife and cause them to leave suitable habitat. Increased levels of trash and garbage during construction could attract invasive wildlife such as ravens, gulls, crows, opossums, skunks, and raccoons, which can lead to increased predation of and competition with special-status wildlife species.

Construction-related indirect effects are most likely to result in impacts to special-status species where resources are in close proximity to construction and the potential for indirect impacts is ultimately limited by topography and distance from the construction footprint. Because most proposed Master Plan development would occur in already-developed portions of campus, away from areas that could support special-status plant and wildlife species, many activities associated with the proposed Master Plan will not result in short-term construction-related indirect impacts to special-status species. Exceptions would exist for special-status bats, which may roost in trees and human-made structures on campus, and common birds protected under California Fish and Game Code and the federal MBTA, which may nest in buildings, trees, and landscape vegetation throughout the developed portions of the campus.

Construction and other activities related to the proposed Master Plan that occur in close proximity to areas that support special-status species could result in indirect impacts to special-status species. Implementation of PDF's described in Section 4.4.3.2 would limit the potential for some indirect impacts to occur. PDF-HWQ-1 requires development of project-specific BMPs for all projects, regardless of acreage, including treatment controls; operating procedures; practices to control site runoff, spills and leaks, sludge or waste disposal, or drainage from raw material storage; and structural and non-structural measures. PDF-HWQ-2 requires effective stormwater management practices, such as installing inlet basin filters at parking lots, collecting and treating stormwater runoff in bioretention basins, and constructing bioswales. In addition, compliance with South Coast Air Quality Management District Rule 403 requires control measures to limit construction-related fugitive dust. Through regulatory compliance and implementation of PDF's, potential indirect impacts related to fugitive dust; litter; and increased erosion, runoff, sedimentation, and chemical pollution would be avoided. Other short-term construction-related indirect effects related to accidental clearing, grading, and trampling outside of established disturbance zones, noise and vibration, and construction lighting could indirectly impact special-status plant and wildlife species; these potential indirect impacts would be **potentially significant**.

Long-term Indirect Effects. Potential long-term indirect impacts to special-status plant and wildlife species are primarily related to edge effects that may occur in native habitats associated with the Voorhis Ecological Reserve and contiguous open space areas. Over the long-term, implementation of the proposed Master Plan will result in an increased human presence on campus, which could lead to increased use of the open space areas on campus. Human activity in these areas may result in the trampling of special-status plants and other vegetation and the compaction of soils, both of which interact with the soil chemistry and can affect soil moisture, water penetration, surface flows, and erosion, which in turn can affect the long-term viability of plants and plant communities. Human activity outside of established trails could result in disturbances to ground-dwelling species such as Crotch's bumble bee and San Diego desert woodrat. These effects could result in the loss of special-status plant species and could indirectly impact special-status wildlife species through habitat degradation and/or injury or mortality. Increased human use of open space areas could also alter wildlife use and/or cause nest abandonment, introduce invasive plant species, and alter natural wildfire regimes (due to accidental or intentional ignitions). Other long-term development-related effects that could impact special-status plant and wildlife species include the introduction of non-native, invasive plant species in campus landscaping and the use of herbicides and pesticides around buildings, both of which could result in the loss or degradation of special-status plants and the degradation of special-status wildlife habitat, and increased light spill, which can also degrade wildlife habitats.

Because most proposed Master Plan development would occur in already-developed portions of campus, away from areas that could support special-status plant and wildlife species, potential long-term indirect impacts related to the introduction of non-native, invasive plant species in campus landscaping and the use of herbicides and pesticides around buildings, and increased light spill are not expected to occur after development of most individual projects associated with the proposed Master Plan. However, potential long-term indirect impacts to special-status plant and wildlife species may occur where individual projects occur in or adjacent to native habitats associated with the Voorhis Ecological Reserve and contiguous open space areas and as a result of the increased student and faculty populations and potential increased usage of these areas. Implementation of applicable state and CSU lighting standards and guidelines contained in Title 24 outdoor lighting standards (CEC 2022), CSU Outdoor Lighting Design Guide (CSU 2018), and CSU Executive Order 0987 related to interior and exterior lighting would reduce the potential for indirect impacts related to increased light spill into occupied habitats (see Section 4.3, Aesthetics, for additional information about these lighting requirements).Nevertheless, this impact as well as the potential long-term indirect impacts on special-status plant and wildlife species related to increased human activity in open space areas, and those related to the introduction of non-native plant species and the use of herbicides and pesticides around new buildings near open space areas, would be **potentially significant**.

Project-Level Analysis for Near-Term Projects

Direct Impacts

Because most near-term projects would occur in already-developed portions of campus, most development would not likely result in the substantial loss of potentially suitable habitat for special-status plants or wildlife species and would not result in the substantial loss of harm to individuals of these species, with the exception of special-status bats. However, the site for the Lower Reservoir Tank Replacement (Building 144) is situated in areas that are surrounded by or adjacent to natural habitats that could support special-status species (see Figure 3-5 in Chapter 3, Project Description, and Figure 4.4-2). Furthermore, as project designs are finalized, additional projects may include disturbance to areas that could support special-status species. If any other near-term project were to result in the disturbance of areas where special-status species may be present, direct impacts could occur through the loss of or harm to individuals and/or the loss of habitat, should those species be present.

Reptiles are vulnerable to injury and mortality during construction because they tend to be cryptic (i.e., able to avoid detection through nocturnality, camouflage, burrowing, etc.), slow moving, and below ground or under rocks or debris during cooler periods. Similarly, because Crotch's bumble bee typically nests underground, individuals would be highly vulnerable to injury and mortality during construction, which could crush nests and individuals, if present on site. Although individual adult birds are unlikely to be directly killed or injured during construction activities because they are highly mobile and would likely leave the area during construction, construction activities could directly impact these species, as well as common species protected by California Fish and Game Code and the federal MBTA, through the destruction and/or damage of nests, which could result in injury or mortality of eggs and/or young. San Diego desert woodrat is also a mobile species; however, individual woodrats could be injured or killed during construction as a result of collisions with equipment or the destruction/damage of occupied middens.

Pallid bat and western mastiff bat could roost in buildings and some mature trees present in both the open space and developed portions of the campus. As a result, many near-term projects, including but not limited to renovation, demolition, and utility improvement projects, could have the potential to directly impact special-status bats should roosts be present within the construction footprint.

Because the exact location and nature of habitat disturbance associated with many of the near-term projects identified above is not fully known at this time, direct impacts on all six special-status plant species and all 14 special-status wildlife species with at least a moderate potential to occur on the Cal Poly Pomona campus, and on common birds protected by California Fish and Game Code and the federal MBTA that may be nesting in areas of disturbance from implementation of the near-term projects are considered **potentially significant.**

Indirect Impacts

In addition to the Lower Reservoir Tank Replacement (Building 144), other near-term projects could be located close enough to suitable habitat for special-status species to be indirectly impacted by short-term construction-related effects and by long-term development-related effects that could occur after construction is completed.

Short-term Indirect Effects. Construction-related indirect effects are most likely to result in impacts to special-status species where resources are in close proximity to construction and the potential for indirect impacts is ultimately limited by topography and distance from the construction footprint. Because most proposed near-term projects would occur in already-developed portions of campus, away from areas that could support special-status plant and wildlife species, many activities associated with the near-term projects will not result in short-term construction-related indirect impacts to special-status species. Exceptions would exist for special-status bats, which may roost in trees and human-made structures on campus, and common birds protected under California Fish and Game Code and the federal MBTA, which may nest in buildings, trees, and landscape vegetation throughout the developed portions of the campus.

Construction and other activities related to the near-term projects that occur near areas that support special-status species could result in indirect impacts to special-status species. Implementation of PDF's described in Section 4.4.3.2 would limit the potential for some indirect impacts to occur. PDF-HWQ-1 requires development of project-specific BMPs for all projects, regardless of acreage, including treatment controls; operating procedures; practices to control site runoff, spills and leaks, sludge or waste disposal, or drainage from raw material storage; and structural and non-structural measures. PDF-HWQ-2 requires effective stormwater management practices, such as installing inlet basin filters at parking lots, collecting and treating stormwater runoff in bioretention basins, and constructing bioswales. In addition, compliance with South Coast Air Quality Management District Rule 403 requires control measures to limit construction-related fugitive dust. Through regulatory compliance and

implementation of PDFs, potential indirect impacts related to fugitive dust; litter; and increased erosion, runoff, sedimentation, and chemical pollution would be avoided. Other short-term construction-related indirect effects related to accidental clearing, grading, and trampling outside of established disturbance zones, noise and vibration, and construction lighting could indirectly impact special-status plant and wildlife species; these potential indirect impacts of the near-term projects would be **potentially significant**.

Long-term Indirect Effects. Because most near-term projects would occur in already-developed portions of campus, away from areas that could support special-status plant and wildlife species, potential long-term indirect impacts related to the introduction of non-native, invasive plant species in campus landscaping and the use of herbicides and pesticides around buildings, and increased light spill are not expected to occur after development of many near-term projects. However, potential long-term indirect impacts to special-status plant and wildlife species may occur where individual projects occur in or adjacent to native habitats associated with the Voorhis Ecological Reserve and contiguous open space areas and as a result of the increased student and faculty populations and potential increased usage of these areas. Implementation of applicable state and CSU lighting standards and guidelines contained in Title 24 outdoor lighting standards (CEC 2022), CSU Outdoor Lighting Design Guide (CSU 2018), and CSU Executive Order 0987 related to interior and exterior lighting would reduce the potential for indirect impacts related to increased light spill into occupied habitats (see Section 4.3, Aesthetics for additional information about these lighting requirements). Nevertheless, this impact as well as the potential long-term indirect impacts on special-status plant and wildlife species related to increased human activity in open space areas, and those related to the introduction of non-native plant species and the use of herbicides and pesticides around new buildings near open space areas, would be **potentially significant**.

Impact Summary

As discussed above, direct and indirect impacts of the proposed Master Plan, including near-term projects, on special-status plants and wildlife species and on common birds protected by the MBTA and/or California Fish and Game Code would be **potentially significant**. With the implementation of mitigation measures MM-BIO-1 (Project-Specific Biological Assessments 1-6), MM-BIO-3 (Nesting Bird Avoidance), MM-BIO-4 (Biological Monitoring), and MM-BIO-5 (WEAP), MM-BIO-6 (Demarcation of Disturbance Limits), MM-BIO-7A (Access Controls and Signage), MM- BIO-7B (Invasive Plant Controls), and MM-BIO-7C (Lighting Controls), potential direct and indirect impacts to special-status plant and wildlife species, as well as common birds under the MBTA and/or California Fish and Game Code, would be reduced to **less than significant**. (See Section 4.4.5, Mitigation Measures, for the full text of these mitigation measures.)

Impact 4.4-2 The project could have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. (Potentially Significant)

A total of seven sensitive vegetation communities were mapped in the study area, including *Juglans californica*/annual herbaceous association, *Juglans californica/Heteromeles arbutifolia* association, *Artemisia californica–Opuntia littoralis* association, *Platanus racemosa–Quercus agrifolia* association, *Platanus racemosa*/annual grass association, *Umbellularia californica–Platanus racemosa* association, and *Sequoia sempervirens* association. These vegetation communities are largely confined to the open space areas northwest and southwest of the core campus area and, with the exception of a small stand of *Sequoia sempervirens* association and two stands of *Juglans californica*/annual herbaceous association, which have persisted on the hills surrounded by the Kellogg West Building, Music Building, and Collins College of Hospitality Management, are not

found within the developed portions of the campus. The location of each sensitive community relative to the proposed Master Plan is described below.

- **California Walnut Groves.** Stands of *Juglans californica*/annual herbaceous association are scattered throughout the southwestern portion of campus, particularly prevalent on the open hills in the southwestern portion of the property, away from development identified in the proposed Master Plan. Two stands of this association were mapped in close proximity to several projects under the proposed Master Plan. *Juglans californica*/annual herbaceous association was mapped west of the Music Building (Building 24 on Figure 3-3), which is proposed for renovation, northwest of the Music Department Modulars (Buildings 24A-F on Figure 3-3), which are proposed for demolition, and immediately southeast of the Kellogg West Conference Center, which is proposed for renovation. The new Bronco Student Center Conference Center (Building 35C) is proposed to be constructed in an area partially mapped as *Juglans californica*/annual herbaceous association (see Figure 3-3 and Figure 4.4-2). Two stands of *Juglans californica/Heteromeles arbutifolia* association were mapped in the eastern extent of the Voorhis Ecological Reserve. The closest proposed development is the near-term replacement of the existing Lower Reservoir Tank (144 on Figure 3-3), which is located approximately 250 feet northeast of this mapped association, and renovation of the Old Administration Building (Building 1 on Figure 3-3), which is located approximately 300 feet southeast of this mapped association. Both project sites are situated downslope of the *Juglans californica/Heteromeles arbutifolia* association.
- **California Sycamore–Coast Live Oak Riparian Woodlands.** *Platanus racemosa–Quercus agrifolia* association is mapped in a canyon bottom at the center of Voorhis Ecological Reserve, approximately 100 feet northwest of the Health Services parking lot. However, there are no proposed Master Plan development located in proximity to this community.

  Two stands of *Platanus racemosa/*annual grass association were mapped on slopes in the open space areas north and west of the core campus, one of which is approximately 100 feet west, extending northwest, of the proposed near-term replacement of the existing Lower Reservoir Tank.

  One stand of *Umbellularia californica–Platanus racemosa* association was mapped along the northern extent of the study area, approximately 150 feet northwest of Los Olivos Commons. The nearest proposed development, the ROTC Relocation and Site Reuse (Building 13B-D), is more than 300 feet southeast and downslope of this community, on the other side of the Los Olivos Commons.
- **Redwood Forest and Woodland.** A small stand (approximately 0.18 acres) of *Sequoia sempervirens* association was mapped immediately southwest of the Music Building (Building 24), which is proposed for renovation and addition northwest of the Music Department Modulars (Buildings 24A-F), which are proposed for demolition (see Figure 3-3 and Figure 4.4-2).
- **California Sagebrush–(Purple Sage) Scrub.** The *Artemisia californica–Opuntia littoralis* provisional association was mapped in a single location in the Voorhis Ecological Reserve, immediately north of the Health Services parking lot. The nearest development is the demolition of the Student Health Services Building (Building 46), located approximately 350 feet southeast of this community, across the Health Services parking lot (Lot J).

Program-Level Analysis for the Master Plan

The significance of direct impacts to sensitive vegetation communities is evaluated based on the loss of sensitive vegetation communities during construction. As a result of proposed Master Plan implementation, sensitive vegetation communities may also be indirectly impacted by short-term construction-related effects and by long-

term development-related effects that could occur after construction is completed. Potential indirect impacts to sensitive vegetation communities would be similar to those that could affect special-status plant species and cause wildlife habitat degradation. Potential short-term construction-related effects include fugitive dust; litter; accidental clearing, grading, and trampling; and increased erosion, runoff, sedimentation, and chemical pollution. Potential long-term development-related effects include increased human presence in open space areas; the introduction of non-native, invasive plant species in campus landscaping; and the use of herbicides and pesticides around buildings, both of which could result in the loss or degradation of vegetation.[1]

As described in Chapter 3, Project Description, the primary strategies for implementing the proposed Master Plan include renovation of existing buildings (renovation), demolition and replacement of existing buildings in the same general physical location (replacement), minimal construction of new buildings at the core of campus (new construction) and leaving most buildings in their existing location and configuration (buildings to remain). Construction of individual projects is generally not expected to result in the loss of sensitive vegetation communities mapped within the study area, with the exception of *Juglans californica*/annual herbaceous association and *Sequoia sempervirens* association, because the proposed Master Plan development would occur in already-developed portions of campus and are not situated close to these communities. A small stand of *Sequoia sempervirens* association and two stands of *Juglans californica*/annual herbaceous association were mapped in an area that is close in proximity to several Master Plan development projects, including renovation of the Music Building (Building 24) and demolition of the Music Department Modulars (Buildings 24A-F). In addition, the new Bronco Student Center Conference Center (Building 35C) is proposed to be constructed in an area partially mapped as *Juglans californica*/annual herbaceous association (see Figure 3-3 in Chapter 3, Project Description, and Figure 4.4-2) and would be expected to result in the permanent loss of this sensitive community. Furthermore, as project designs are finalized, additional projects may involve disturbance to areas where sensitive vegetation communities are present or nearby, which may indirectly impact or result in the permanent or temporary loss of these communities.

The proposed Master Plan could result in direct impacts due to the permanent or temporary loss of sensitive vegetation communities during construction. Regarding indirect impacts to sensitive vegetation communities, the proposed Master Plan would comply with the NPDES Construction General Permit, which requires the preparation and implementation of a stormwater pollution prevention plan (SWPPP) that would include erosion control and sediment control BMPs. As described in Section 4.10, Hydrology and Water Quality, the proposed Master Plan includes implementation of PDF-HWQ-1, which requires development of project-specific BMPs for all projects, regardless of acreage, including treatment controls; operating procedures; practices to control site runoff, spills and leaks, sludge or waste disposal, or drainage from raw material storage; and structural and non-structural measures, and PDF-HWQ-2, which requires effective stormwater management practices, such as installing inlet basin filters at parking lots, collecting and treating stormwater runoff in bioretention basins, and constructing bioswales, as well as compliance with South Coast Air Quality Management District Rule 403, which requires implementation of control measures to limit construction-related fugitive dust. However, short-term construction-related effects related to accidental clearing, grading, and trampling outside of established disturbance zones could indirectly impact sensitive vegetation communities. In addition, potential long-term indirect impacts related to increased human activity in open space areas, the introduction of non-native plant species, and the use of herbicides and pesticides around buildings near open space which could result in the loss or degradation of sensitive vegetation communities. Because the exact location and nature of disturbance is not fully known, direct

[1] See the impact analysis for indirect impacts to special-status plants for a detailed discussion of how these short-term and long-term effects can indirectly impact vegetation.

and indirect impacts to all seven sensitive vegetation communities mapped within the study area from implementation of the proposed Master Plan are considered **potentially significant**.

With the implementation of MM-BIO-2 (Sensitive Vegetation Communities Protection and Replacement), potential direct impacts to sensitive vegetation communities would be reduced to less than significant. With implementation of MM-BIO-2, MM-BIO-4 (Biological Monitoring), MM-BIO-5 (WEAP), MM-BIO-6 (Demarcation and Disturbance Limits), MM-BIO-7A (Access Controls and Signage), and MM-BIO-7B (Invasive Plant Controls), potential short-term and long-term indirect impacts to sensitive vegetation communities would be reduced to **less than significant**. (See Section 4.4.5, Mitigation Measures, for the full text of these mitigation measures.)

Project-Level Analysis for Near-Term Projects

Construction of individual near-term projects is generally not expected to result in the loss of sensitive vegetation communities mapped within the study area, with the exception of *Juglans californica/*annual herbaceous association and *Sequoia sempervirens* association, because the near-term projects would occur in already-developed portions of campus and are not situated close to these communities. A small stand of *Sequoia sempervirens* association and two stands of *Juglans californica/*annual herbaceous association were mapped in an area that is close in proximity to several near-term projects, including renovation of the Kellogg West Education/Dining (Building 76), Kellogg West/Addition (Building 76A), Kellogg West Main Lodge (Building 77), and Kellogg West Addition (Building 78) (see Figure 3-5 in Chapter 3, Project Description, and Figure 4.4-2). Furthermore, as project designs are finalized, additional projects may involve disturbance to areas where sensitive vegetation communities are present or nearby, which may indirectly impact or result in the permanent or temporary loss of these communities.

The near-term projects could result in direct impacts resulting from the permanent or temporary loss of sensitive vegetation communities. Regarding indirect impacts to sensitive vegetation communities, the near-term projects would comply with the NPDES Construction General Permit, which requires the preparation and implementation of a SWPPP that would include erosion control and sediment control BMPs. As described in Section 4.11, Hydrology and Water Quality, the near-term projects include implementation of PDF-HWQ-1 and PDF-HWQ-2. PDF-HWQ-1 requires development of project-specific BMPs for all projects, regardless of acreage, including treatment controls; operating procedures; practices to control site runoff, spills and leaks, sludge or waste disposal, or drainage from raw material storage; and structural and non-structural measures. PDF-HWQ-2 requires effective stormwater management practices, such as installing inlet basin filters at parking lots, collecting and treating stormwater runoff in bioretention basins, and constructing bioswales, as well as compliance with South Coast Air Quality Management District Rule 403, which requires implementation of control measures to limit construction-related fugitive dust. However, short-term construction-related effects related to accidental clearing, grading, and trampling outside of established disturbance zones could indirectly impact sensitive vegetation communities. In addition, potential long-term indirect impacts related to increased human activity in open space areas, the introduction of non-native plant species, and the use of herbicides and pesticides around buildings near open space which could result in the loss or degradation of sensitive vegetation communities. Because the exact location and nature of disturbance is not fully known, direct and indirect impacts to all seven sensitive vegetation communities mapped within the study area from implementation of the near-term projects are considered **potentially significant**.

With the implementation of MM-BIO-2 (Sensitive Vegetation Communities Protection and Replacement), potential direct impacts of near-term projects to sensitive vegetation communities would be reduced to less than significant. With implementation of MM-BIO-2, MM-BIO-4 (Biological Monitoring), MM-BIO-5 (WEAP), MM-BIO-6 (Demarcation and Disturbance Limits), MM-BIO-7A (Access Controls and Signage), and MM-BIO-7B (Invasive

Plant Controls), potential short-term and long-term indirect impacts of near-term projects to sensitive vegetation communities would be reduced to **less than significant**. (See Section 4.4.5, Mitigation Measures, for the full text of these mitigation measures.)

Impact 4.4-3 The project could have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. (Potentially Significant)

Program-Level Analysis for the Master Plan

Direct impacts to potentially jurisdictional aquatic resources regulated by USACE, RWQCB, and/or CDFW could occur as a result of grading or other ground disturbance during construction, leading to the loss of beneficial uses, functions, and values. Individual projects could cause short-term and long-term indirect impacts to these resources. Potential short-term construction-related indirect impacts include accidental clearing, grading, or trampling of riparian vegetation and increased erosion, runoff, sedimentation, and chemical pollution. Potential long-term development-related impacts include those related to increased human presence in open space areas; the introduction of non-native, invasive plant species in campus landscaping; and the use of herbicides and pesticides around buildings, both of which could result in the loss or degradation of vegetation, all of which could result in the loss of beneficial uses, functions, and values associated with these aquatic resources.

Because of the distance of San Jose Creek from the study area (more than 0.25 miles at its closest point), no direct or indirect impacts would be expected to this feature due to proposed Master Plan implementation. Similarly, none of the proposed Master Plan activities are anticipated to directly or indirectly impact the pond and uncovered reservoir, described in Section 4.4.1.6, Potential Jurisdictional Wetlands and Waters.

As described in Chapter 3, Project Description, the primary strategies for implementing the proposed Master Plan include renovation of existing buildings (renovation), demolition and replacement of existing buildings in the same general physical location (replacement), minimal construction of new buildings at the core of campus (new construction) and leaving most buildings in their existing location and configuration (buildings to remain). Because most proposed Master Plan development would occur in already-developed portions of campus, away from the ephemeral drainages north of the campus core, such development would not result in direct or indirect impacts to potentially jurisdictional aquatic resources. However, the proposed Lower Reservoir Tank Replacement (Building 144) and the Old Administration Building [Building 1]) are adjacent to the Voorhis Ecological Reserve, where potentially jurisdictional ephemeral drainages are present (see Figure 3-3 and Figure 4.4-2). Furthermore, as project designs are finalized, additional projects may include disturbance to areas containing or near potentially jurisdictional aquatic resources.

The proposed Master Plan could result in direct impacts due to the loss of jurisdictional waters during construction. Regarding indirect impacts to jurisdictional waters, the proposed Master Plan includes implementation of PDF-HWQ-1, which requires development of project-specific BMPs for all projects, regardless of acreage, including treatment controls; operating procedures; practices to control site runoff, spills and leaks, sludge or waste disposal, or drainage from raw material storage; and structural and non-structural measures, and PDF-HWQ-2, which requires effective stormwater management practices, such as installing inlet basin filters at parking lots, collecting and treating stormwater runoff in bioretention basins, and constructing bioswales. However, short-term construction-related effects related to accidental clearing, grading, and trampling outside of established disturbance zones could indirectly impact jurisdictional waters. In addition, potential long-term indirect impacts related to increased human activity in open space areas, the introduction of non-native plant species, and the use of herbicides and pesticides

around buildings near open space, could result in the loss or degradation of riparian vegetation or otherwise result in the loss of beneficial uses, functions, and values of jurisdictional waters. Overall, the proposed Master Plan impact on jurisdictional water would be **potentially significant**.

With the implementation of MM-BIO-8 (Aquatic Resource Permitting and Mitigation), potential direct impacts to jurisdictional aquatic resources would be reduced to **less than significant**. With implementation of MM-BIO-8, MM-BIO-4 (Biological Monitoring), MM-BIO-5 (WEAP), MM-BIO-6 (Demarcation of Disturbance Limits), MM-BIO-7A (Access Controls and Signage), and MM-BIO-7B (Invasive Plant Controls), potential short-term and long-term indirect impacts to jurisdictional aquatic resources would be reduced to **less than significant**. (See Section 4.4.5, Mitigation Measures, for the full text of these mitigation measures.)

Project-Level Analysis for Near-Term Projects

Because of the distance of San Jose Creek from the study area (more than 0.25 miles at its closest point), no direct or indirect impacts would be expected to this feature due to near-term project implementation. Similarly, none of the near-term project activities are anticipated to directly or indirectly impact the pond and uncovered reservoir, described in Section 4.4.1.6, Potential Jurisdictional Wetlands and Waters. One near-term project is located near the Thompson Wash – the Bronco Mobility Hub. However, the location of the Mobility Hub is separated from the Thompson Wash by South Campus Drive and construction activities associated with this project are not expected to directly or indirectly impact Thompson Wash.

Because most proposed near-term projects would occur in already-developed portions of campus, away from the ephemeral drainages north of the campus core, they will not result in direct or indirect impacts to potentially jurisdictional aquatic resources. However, two near-term projects (the Lower Reservoir Tank Replacement [Building 144] and the Old Administration Building [Building 1]) are within or adjacent to the Voorhis Ecological Reserve, near areas where potentially jurisdictional ephemeral drainages are present (see Figure 3-5 and Figure 4.4-2). Furthermore, as project designs are finalized, additional projects may include disturbance to areas containing or near potentially jurisdictional aquatic resources.

The near-term projects could result in direct impacts to jurisdictional waters. Regarding indirect impacts to jurisdictional waters, the near-term projects would comply with the NPDES Construction General Permit, which requires the preparation and implementation of a SWPPP that would include erosion control and sediment control BMPs. As described in Section 4.11, Hydrology and Water Quality, the near-term projects also include implementation of PDF-HWQ-1, which requires development of project-specific BMPs for all projects, regardless of acreage, including treatment controls; operating procedures; practices to control site runoff, spills and leaks, sludge or waste disposal, or drainage from raw material storage; and structural and non-structural measures, and PDF-HWQ-2, which requires effective stormwater management practices, such as installing inlet basin filters at parking lots, collecting and treating stormwater runoff in bioretention basins, and constructing bioswales. However, short-term construction-related effects related to accidental clearing, grading, and trampling outside of established disturbance zones could indirectly impact jurisdictional waters. In addition, potential long-term indirect impacts related to increased human activity in open space areas, the introduction of non-native plant species, and the use of herbicides and pesticides around buildings near open space, could result in the loss or degradation of riparian vegetation or otherwise result in the loss of beneficial uses, functions, and values of jurisdictional waters. Overall, the impact of near-term projects on jurisdictional water would be **potentially significant**.

With the implementation of MM-BIO-8 (Aquatic Resource Permitting and Mitigation), potential direct impacts of near-term projects to jurisdictional aquatic resources would be reduced to **less than significant**. With

implementation of MM-BIO-8, MM-BIO-4 (Biological Monitoring), MM-BIO-5 (WEAP), MM-BIO-6 (Demarcation of Disturbance Limits), MM-BIO-7A (Access Controls and Signage), and MM-BIO-7B (Invasive Plant Controls), potential short-term and long-term indirect impacts of near-term projects to jurisdictional aquatic resources would be reduced to **less than significant**. (See Section 4.4.5, Mitigation Measures, for the full text of these mitigation measures.)

Impact 4.4-4 The project could interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. (Potentially Significant)

Program-Level Analysis for the Master Plan

As previously discussed in Section 4.4.1.7, the Cal Poly Pomona campus does not currently function as a wildlife corridor or habitat linkage and implementation of the proposed Master Plan is not expected to impact regional wildlife movement. Furthermore, because the proposed Master Plan would be largely focused on the already-developed portions of campus, with few individual development projects permanently affecting the open space portions of campus, the proposed Master Plan is not expected to have any effect on the local wildlife movement value that the open space portions of campus may provide.

Pallid bat and western mastiff bat, as well as several common bat species, could roost in buildings and some mature trees present in both the open space and developed portions of the campus. As a result, the proposed Master Plan, including but not limited to renovation, demolition, and utility improvement projects, could have the potential to directly and indirectly impact special-status bats should roosts be present within the construction footprint. Should maternity roosts be present on campus, implementation of the proposed Master Plan could impede the use of native wildlife nursery sites (bat roosts), as described in Impact 4.4-1, and the impact would be **potentially significant**.

With the implementation of MM-BIO-1(6) (Bat Surveys and Roost Avoidance and Exclusion), MM-BIO-4 (Biological Monitoring), MM-BIO-5 (WEAP), MM-BIO-7(A) (Access Controls and Signage), MM-BIO-7(B) (Invasive Plant Controls), and MM-BIO-7(C) (Lighting Controls), potential direct and indirect impacts (both short-term and long-term), to bat maternity roosts would be reduced to **less than significant**. (See Section 4.4.5, Mitigation Measures, for the full text of these mitigation measures.)

Project-Level Analysis for Near-Term Projects

Pallid bat and western mastiff bat, as well as several common bat species, could roost in buildings and some mature trees present in both the open space and developed portions of the campus. As a result, many near-term projects, including but not limited to renovation, demolition, and utility improvement projects, could have the potential to directly and indirectly impact special-status bats should roosts be present within the construction footprint. Should maternity roosts be present on campus, implementation of the near-term projects could impede the use of native wildlife nursery sites (bat roosts), as described in Impact 4.4-1, and the impact would be **potentially significant**.

With the implementation of MM-BIO-1-6 (Bat Surveys and Roost Avoidance and Exclusion), MM-BIO-4 (Biological Monitoring), MM-BIO-5 (WEAP), MM-BIO-7A (Access Controls and Signage), MM-BIO-7B (Invasive Plant Controls), and MM-BIO-7C (Lighting Controls), potential direct and indirect impacts (both short-term and long-term) of near-term projects to bat maternity roosts would be reduced to **less than significant**. (See Section 4.4.5, Mitigation Measures, for the full text of these mitigation measures.)

4.4.4.3 Cumulative Impacts

Impact 4.4-5 The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to biological resources. (Less than Significant)

For biological resources, there is the potential for cumulative impacts to result if similar resources are affected by both the proposed Master Plan, including near-term projects, and one or more of the related cumulative projects. The past, present, and reasonably foreseeable future projects (i.e., "related projects") used for this analysis are presented in Section 4.0.6, Cumulative Impacts, and on Figure 4.0-1, Cumulative Projects, of Chapter 4.0, Environmental Analysis, of this EIR. This analysis will evaluate whether the incremental effect of the proposed Master Plan is cumulatively considerable.

Most of the related cumulative projects are infill projects with minimal value to biological resources, involving the development of previously disturbed or developed lands that contain limited native vegetation and are isolated from naturalized areas by surrounding development. As such, these related projects would not be expected to support habitat that would be suitable for most special-status plant and wildlife species or contain other sensitive biological resources that could be incrementally impacted by the proposed Master Plan, including sensitive vegetation communities, jurisdictional aquatic resources, or wildlife nursery sites. Therefore, nearly all of the related projects would not result in incremental impacts to sensitive biological resources and would not be cumulatively considerable. Only related cumulative projects 7 (Elephant Hill Project), 9 (1561 Via Estrella Subdivision), and 13 (FairPlex Specific Plan) are located in areas that may support similar habitats and present similar potential biological constraints to those present on the Cal Poly Pomona campus. Therefore, the proposed Master Plan could incrementally contribute to the cumulative impacts of protected biological resources, including special-status plant and wildlife species and their habitat, sensitive vegetation communities, jurisdictional aquatic resources, and wildlife nursery sites. As discussed in the analysis in Impact 4.4-1, Impact 4.4-2, Impact 4.4-3, and Impact 4.4-4, implementation of MM-BIO-1, MM-BIO-2, MM-BIO-3, MM-BIO-4, MM-BIO-5, MM-BIO-6, MM-BIO-7A, MM- BIO-7B, MM-BIO-7C, and MM-BIO-8 would reduce all proposed Master Plan impacts to less than significant.

Because related cumulative projects are mostly infill projects with minimal habitat value for special-status species, all related projects would be subject to existing and/or future permit restrictions that satisfy regulatory and resource agency requirements, and the proposed Master Plan's potential incremental effect(s) on biological resources would be reduced to less than significant, cumulative impacts to biological resources are not expected to be significant and the proposed Master Pla would not have a considerable contribution to any potentially significant cumulative impact. Therefore, the cumulative impact of the proposed Master Plan on biological resources would be **less than significant**.

4.4.5 Mitigation Measures

MM-BIO-1 Project-Specific Biological Assessments. For individual projects that could directly or indirectly impact special-status plant or wildlife species or special-status species' habitat, as determined by a qualified biologist, Cal Poly Pomona shall require the focused biological surveys outlined in this mitigation measure be conducted prior to the commencement of construction activities. For individual projects that will not directly or indirectly impact special-status plant or wildlife species or their habitat, as determined by a qualified biologist (e.g., renovation projects comprising indoor work only), no surveys for biological resources shall be required. A report describing the results of each survey shall be provided to Cal Poly Pomona prior to the start of individual project activities. The report shall include, at a minimum 1) a description of the biological conditions in the vicinity of the individual project site; 2) identification of special-status species observed or detected, if any, including maps depicting their location(s) and potentially suitable habitat; and 3) a description of impacts to special-status species and their habitat that have the potential to occur as a result of individual project implementation. If an individual project has the potential to directly or indirectly impact special-status species or their habitat, the report shall identify Master Plan EIR mitigation measures from this EIR to reduce potentially significant impacts to these resources to less than significant. If additional mitigation measures, beyond those outlined in this EIR, are required to reduce potentially significant impacts to these resources to less than significant, such measures will also be identified.

1. Special-Status Plants. For individual projects that could directly or indirectly impact special-status plant species, as determined by a qualified biologist, pre-construction focused botanical surveys shall be conducted by a qualified botanist during the appropriate blooming period for special-status plant species that may be impacted. Botanical surveys may be required for the following species, which have the potential to occur within the study area: intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*), Parry's spineflower (*Chorizanthe parryi* var. *parryi*), many-stemmed dudleya (*Dudleya multicaulis*), mesa horkelia (*Horkelia cuneata* var. *puberula*), white rabbit-tobacco (*Pseudognaphalium leucocephalum*), and chaparral ragwort (*Senecio aphanactis*).

   Special-status plant populations that may be directly or indirectly impacted during individual project implementation shall be demarcated using a Global Positioning System with submeter accuracy and flagged in the field with high-visibility tape or similar. Direct impacts to special-status plants shall be avoided and a qualified biologist shall delineate an appropriate avoidance buffer around the plants, within which construction activities shall be prohibited in order to avoid indirect impacts to these resources. A qualified biologist shall recommend construction best management practices required to avoid or minimize indirect impacts to special-status plants near construction activities.

   If avoidance of direct or indirect impacts to special-status plant species is not feasible, and if the project-specific analysis determines the impact to be significant absent mitigation, compensatory mitigation shall be required, entailing one of, or a combination of, the following:

   a) The on-site or off-site protection, through dedication of an on-site or off-site conservation easement and/or the purchase of mitigation credits at an approved mitigation bank. Individual plants lost shall be mitigated at a minimum 1:1 ratio, with the final required

mitigation ratio to consider acreage, functions, and values of the impacted population and the mitigation population.

b) If it is not feasible to preserve a known population of a special-status plant species to be impacted, all or a portion of the mitigation obligation shall be met through the creation of a new population in suitable unoccupied habitat capable of supporting the species. For population creation, prior to disturbance to a population of a special-status plant species, propagules shall be collected from the population to be lost. The propagules, which may include seed collection or cuttings, will be used to establish a new population on suitable, unoccupied habitat. Transplantation may be attempted but will not be used as the primary means of plant salvage and population creation. Lands where creation will occur shall be protected through establishment of a conservation easement.

For all conserved lands, a Conservation Management Plan shall be prepared by a qualified botanist and reviewed and approved by Cal Poly Pomona prior to individual project implementation. The plan shall include, at a minimum:

a) Detailed methods of preservation, enhancement, rehabilitation, and/or propagation and planting shall be described, as appropriate

b) Success criteria and long-term monitoring and management requirements to ensure mitigation success, including requirements that all mitigation populations be self-producing. Populations will be considered self-producing when:

   i. Plants reestablish annually for a minimum of 5 years with no human intervention such as supplemental seeding; and

   ii. Reestablished and preserved habitats contain an occupied area and flower density comparable to or that exceed those at the impacted population.

c) Adaptive management and remedial measures shall be implemented if success criteria are not achieved

d) Responsible parties and funding sources shall be identified for any mitigation lands required to be conserved in perpetuity

2) Coastal California Gnatcatcher. For individual projects that have the potential to directly or indirectly impact coastal California gnatcatcher (*Polioptila californica californica*), focused surveys shall be conducted prior to the start of construction to document the extent of occupied habitat. Surveys shall be conducted in accordance with the most recent United States Fish and Wildlife Service protocols and shall cover all potentially suitable habitat for coastal California gnatcatcher within 500 feet of proposed disturbance areas. Focused surveys shall be completed no more than 1 year prior to the start of the individual project; if more than 1 year lapses between the completion of surveys and the start of an individual project, focused surveys shall be repeated. The extent of occupied habitat shall be clearly depicted on construction plans and the information provided to the construction supervisor and any personnel working near the buffer.

Occupied habitat shall not be cleared between February 15 and August 31 (or sooner if a biologist demonstrates to the satisfaction of the U.S. Fish and Wildlife Service that all gnatcatcher nesting is complete). Occupied habitat that is temporarily impacted during construction of individual projects shall be restored to its original condition. Cal Poly Pomona shall prepare and implement a conceptual restoration plan detailing the methods of revegetation, success criteria, and monitoring and maintenance requirements to ensure

mitigation success. The permanent loss of occupied coastal California gnatcatcher habitat shall be mitigated through habitat replacement of equal or better functions and values to those impacted by the project at a minimum 2:1 ratio, or as determined through the consultation process with U.S. Fish and Wildlife Service. Mitigation shall be achieved through on-site or off-site conservation of habitat and/or purchase of appropriate credits at an approved mitigation bank.

To minimize potential indirect impacts to coastal California gnatcatcher, construction-related activities within 500 feet of occupied habitat will be timed to occur outside of the breeding season (February 15 through August 31), if possible. Pre-constructions surveys for coastal California gnatcatcher shall be conducted in all suitable habitat within 500 feet of construction activities that will occur between February 15 and August 31. Pre-construction surveys shall be conducted by a qualified biologist familiar with identifying coastal California gnatcatcher and shall include 3 site visits, conducted 1 week apart, with the final site visit conducted no more than 7 days prior to the start of construction. If coastal California gnatcatcher is not detected, no further mitigation related to this species shall be required. If coastal California gnatcatcher is detected but breeding behaviors are not observed, work may proceed and weekly surveys shall continue until the individual(s) leave the area, nesting is detected, the breeding season ends, or construction ends. If an active nest (including nest building or a nest containing viable eggs or young) is detected during the pre-construction or weekly surveys, the project biologist shall flag the nest location and a 500-foot avoidance buffer, depict their locations on the construction plans, and provide the information to the construction supervisor and any personnel working near the nest buffer. To the extent feasible, no construction activities shall occur within the 500-foot avoidance buffer. Should it be necessary for construction activities to occur within the 500-foot avoidance buffer, a qualified biologist shall conduct sound monitoring near the observed nesting position(s) to document the pre-construction outdoor ambient noise level and any signs of disturbance prior to construction activities. Nest locations, their horizontal distances to planned construction activities, and the measured outdoor ambient noise levels shall be provided to a qualified acoustician, who shall recommend implementation of practical noise reduction technique(s), if necessary, that would yield predicted construction noise exposure at the nest location not greater than the allowable threshold of 60 A-weighted decibels (dBA) equivalent continuous sound level (L_{eq}) (1 hour) or ambient noise level, whichever is higher. Noise reduction techniques may include but are not limited to constructing a sound barrier, utilization of quieter equipment, adherence to equipment maintenance schedules, installation of temporary sound barriers, or shifting construction work further from the nest.

During construction activities within 500 feet of an active coastal California gnatcatcher nest, a qualified biologist shall monitor the nest locations and document any signs of disturbance. If there are signs of disturbance, further noise reduction techniques beyond those required to limit noise exposure at the nest to 60 dBA hourly L_{eq} or the ambient noise level, whichever is lower, shall be implemented.

Night lighting shall be prohibited during construction within 500 feet of an active coastal California gnatcatcher nest, unless written concurrence is provided by the United States Fish and Wildlife Service.

For individual projects that may affect coastal California gnatcatcher or its critical habitat, all necessary take authorizations shall be obtained through federal Section 7 consultation or a Section 10 Incidental Take Permit, in advance of construction initiation.

3) **Crotch's Bumble Bee.** If ground-disturbing activities occur outside of the overwintering season for Crotch's bumble bee (*Bombus crotchii*) (which extends from November through January), focused surveys shall be conducted in suitable habitat (areas that provide suitable nesting and/or foraging resources) within 50 feet of the construction footprint prior to the start of construction activities. Surveys shall be conducted by a qualified biologist familiar with the species' behavior and life history, in accordance with the recommendations described in the Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species, released by the California Department of Fish and Wildlife (CDFW) on June 6, 2023, or the most current version at the time of construction. The survey shall focus on detecting Crotch's bumble bee nests, as well as foraging individuals, within 50 feet of the disturbance footprint. If active nests of Crotch's bumble bee are present, an avoidance buffer of at least 50 feet, as determined by the project biologist, shall be established around the nest to reduce the risk of disturbance or accidental take. Construction activities shall not occur within the avoidance buffer(s) until the colony is no longer active (i.e., no bees are seen flying in or out of the nest for three consecutive days indicating the colony has completed its nesting season and the next season's queens have dispersed from the colony). If a nest is detected or if foraging individuals are observed, Cal Poly Pomona shall consult with CDFW to confirm that any proposed site-specific avoidance measures, such as the avoidance buffers described above, are sufficient to avoid take. Additional avoidance measures could include but are not limited to seasonal restrictions pertaining to the removal of flowering plants and pesticide/herbicide use, dust control measures, and erosion control measures.

   If active nests cannot be avoided, or take of foraging individuals is anticipated, necessary take authorization shall be obtained in the form of an Incidental Take Permit pursuant to California Fish and Game Code Section 2081. Occupied habitat that is temporarily impacted during construction of individual projects shall be restored to its original condition. Cal Poly Pomona shall prepare and implement a conceptual restoration plan detailing the methods of revegetation, success criteria, and monitoring and maintenance requirements to ensure mitigation success. Compensatory mitigation for the permanent loss of occupied Crotch's bumble bee habitat shall be fulfilled through habitat replacement of equal or better functions and values to those impacted by the project at a minimum 1:1 ratio, or as otherwise determined through the Incidental Take Permit process. Mitigation shall be achieved through on-site or off-site conservation of habitat and/or purchase of appropriate credits at a CDFW-approved mitigation bank.

4) **Burrowing Owl.** For individual projects that could directly or indirectly impact burrowing owl (*Athene cunicularia*) or its habitat, as determined by a qualified biologist, the following requirements shall be implemented.

   a) **Habitat Assessment.** A habitat assessment shall be conducted in accordance with protocols established in the California Department of Fish and Game 2012 Staff Report on Burrowing Owl Mitigation, or most recent CDFW guidance, to evaluate the likelihood that a site supports burrowing owl. The results of the habitat assessment shall be provided to Cal Poly Pomona. If, based on the results of the habitat assessment, burrowing owl may be

present in areas that could be directly or indirectly impacted during construction, breeding season and non-breeding season surveys shall be required, as outlined in part b of this mitigation measure. If a qualified biologist determines that areas direct or indirect impacts could occur do not have the potential to support breeding or overwintering burrowing owl, no further mitigation related to this species shall be required.

b) **Breeding Season Surveys and Non-Breeding Season Surveys.** Focused breeding and non-breeding season surveys for burrowing owl shall be conducted in accordance with protocols established in the California Department of Fish and Game 2012 Staff Report on Burrowing Owl Mitigation or most recent CDFW guidance. As outlined in the 2012 Staff Report, breeding season surveys shall occur from February 1 through August 31 and non-breeding season surveys shall occur from September 1 to January 31. If burrowing owl are not detected during either survey, pre-construction surveys shall be completed, as described in part c of this mitigation measure. If burrowing owls are detected during either breeding season or non-breeding season surveys, avoidance and preparation of a Burrowing Owl Plan shall be required as outlined in Part d and Part e of this mitigation measure.

c) **Pre-Construction Surveys.** One pre-construction burrowing owl survey shall be completed no more than 14 days before initiation of site preparation or grading activities, and a second survey shall be completed within 24 hours of the start of site preparation or grading activities. If ground-disturbing activities are delayed or suspended for more than 30 days after the pre-construction surveys, the pre-construction surveys shall be repeated. Surveys for burrowing owl shall be conducted in accordance with protocols established in the 2012 Staff Report. Evidence of owl activity may include presence of owls themselves, burrows, and owl sign at burrow entrances such as pellets, whitewash or other "ornamentation," feathers, prey remains, etc. If it is evident that burrows are actively being used by burrowing owl, avoidance and preparation of a Burrowing Owl Plan shall be required as outlined in part d and part e of this mitigation measure.

d) **Avoidance.** Avoidance buffers shall be clearly delineated at a 250-foot radius around all occupied burrows within 400 feet of the disturbance footprint, with posted signs demarcating the avoidance area and by using stakes, flags, and/or rope or cord to minimize the disturbance of burrowing owl habitat. No construction shall occur within the avoidance buffer(s) without the consent of a monitoring biologist. The buffer shall remain in place until it is determined that occupied burrows have been vacated.

e) **Burrowing Owl Management Plan.** If burrowing owls are detected, Cal Poly Pomona shall prepare a Burrowing Owl Management Plan that shall be submitted to CDFW for review and approval at least 30 days prior to initiation of ground-disturbing activities. If burrowing owls are detected after ground-disturbing activities have been initiated, CDFW shall be notified in writing and a Burrowing Owl Management Plan shall be submitted to CDFW for review and approval within 2 weeks of detection. Construction activities shall not occur within 400 feet of an active burrow until CDFW approves the Burrowing Owl Management Plan. The Burrowing Owl Management Plan shall include but is not limited to 1) impact assessment that details the number and location of occupied burrow sites and acres of burrowing owl habitat with a qualitative description of the habitat vegetation characteristics that will be impacted; 2) avoidance actions such as proposed buffers and

visual barriers; 3) monitoring requirements; and 4) compensatory mitigation actions that will be implemented.

f) **Incidental Take and Compensatory Mitigation.** No take of burrowing owl shall occur without prior authorization in the form of an Incidental Take Permit pursuant to California Fish and Game Code Section 2081. Occupied habitat that is temporarily impacted shall be restored to its original construction immediately following the completion of construction. Mitigation for the permanent loss of occupied burrowing owl habitat shall be fulfilled through habitat replacement of equal or better functions and values to those impacted by the project at a minimum 1:1 ratio, or as otherwise determined through the Incidental Take Permit process. Mitigation shall be achieved through on-site or off-site conservation of habitat and/or purchase of appropriate credits at a CDFW-approved mitigation bank.

5) **Special-Status Terrestrial Mammals and Reptiles.** For individual projects that could directly or indirectly impact special-status reptile and/or mammal species, including San Diego desert woodrat (*Neotoma lepida intermedia*), Southern California legless lizard (*Anniella stebbinsi*), San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*), red diamondback rattlesnake (*Crotalus ruber*), Blainville's horned lizard (*Phrynosoma blainvillii*), and/or coast patch-nosed snake (*Salvadora hexalepis virgultea*), a Special-Status Wildlife Survey and Relocation Plan shall be developed and submitted to Cal Poly Pomona for review and approval prior to the start of construction. The plan shall include requirements for pre-construction surveys for these species; identify timing, frequency, and locations where surveys should be conducted; and describe methods for trapping and relocating individuals that could be directly or indirectly impacted during construction.

Prior to the pre-construction survey, the contractor, under the direction of a qualified biologist, shall install wildlife exclusion fencing to prevent special-status terrestrial mammals and reptiles from entering the work area. The wildlife exclusion fencing must be trenched into the soil at least 4 inches in depth, with the soil compacted against both sides of the fence for its entire length and must have intermittent exit points. Turnarounds shall be installed at access points to direct amphibians and reptiles away from gaps in the fencing. A biological monitor shall inspect exclusion fencing on a regular basis and coordinate with the contractor to repair any damaged or failing sections.

The pre-construction survey shall be conducted no more than 48 hours prior to the initiation of ground disturbance and shall be repeated before ground-disturbing activities begin on the first day of construction. The pre-construction survey shall include all suitable habitat within the excluded area or within 50 feet of the proposed disturbance footprint if installation of exclusion fencing is not feasible. Special-status reptiles shall be captured and relocated, in accordance with methods described in the relocation plan, to suitable habitat within the open space areas north and west of the Cal Poly Pomona core campus, outside of the excluded area, which shall be described in the relocation plan. To the extent feasible, impacts to San Diego desert woodrat middens shall be avoided and exclusion fencing shall be located to ensure woodrats cannot enter the work area. The relocation plan shall describe methods for woodrat relocation, to be employed in instances where midden avoidance is not possible, which may include relocation of the middens as well as woodrat individuals.

Suitable habitat for special-status reptile and mammal species that is temporarily impacted during construction of individual projects shall be restored to its original condition. Cal Poly Pomona shall prepare and implement a conceptual restoration plan detailing the methods of

revegetation, success criteria, and monitoring and maintenance requirements to ensure mitigation success. The permanent loss of suitable habitat shall be mitigated through 1:1 habitat replacement of equal or better functions and values to those impacted by the project. Mitigation shall be achieved through on-site or off-site conservation of habitat and/or purchase of appropriate credits at an approved mitigation bank.

6) **Bat Surveys and Roost Avoidance and Exclusion.** Prior to construction activities that could disturb potential bat roost sites, including tree trimming or removal and the demolition of existing structures, a qualified biologist shall conduct a pre-construction survey for roosting bats to determine if existing or potential maternity roosts are present on site. If no roost sites are identified, no additional measures shall be required to avoid impacts to bat species. If bats are observed roosting, or potential roost sites are identified, in areas that may be disturbed, the following measures shall be implemented prior to the maternity roosting season to reduce the potential impact to special-status and common bat species.

   a) **Maternity Roosting Season Avoidance.** All proposed construction activities that could impact potential or known maternity roost sites, as determined by a qualified bat biologist, including bat roost exclusion, shall occur outside of the general bat maternity roosting season of March through August. Prior to the removal or disturbance of a potential or known maternity roost site, bats shall be excluded from the roost site, after which the roost site can be removed. Items 2 and 3, below, shall be required to ensure no impacts occur to roosting bats during the exclusion process.

   b) **Replacement Roost Installation.** If there is a potential or known maternity roost within a structure to be demolished or vegetation to be removed or disturbed and suitable alternative roost sites are not present in the vicinity, as determined by the bat biologist, a replacement roost shall be installed. Replacement roost installation shall occur outside of the maternity roosting season. At least 1 month prior to the exclusion of bats from a roost, the biologist shall procure and install bat boxes from a reputable vendor, such as Bat Conservation and Management, to allow bats sufficient time to acclimate to a new potential roost location. The bat boxes shall be installed within close proximity to the existing roost site and in an area that is within close proximity to suitable foraging habitat. Additionally, the bat boxes shall be oriented to the south or southwest, and the area chosen for the bat boxes must receive sufficient sunlight (at least 6 hours) to allow the bat boxes to reach an optimum internal temperature (approximately 90°F) to mimic the existing bat roost. The bat boxes shall be suitable for the bat species present on site and large enough to contain a minimum of 50 bats (e.g., Four Chamber Premium Bat House or Bat Bunker Plus). The bat boxes shall be installed on a minimum 20-foot-tall steel pole and under the guidance of the bat biologist.

   c) **Roost Exclusion.** Bats shall be excluded from known and potential roost sites that could be impacted during construction. Roost exclusion shall occur outside of the maternity roosting season, during the time when bats are most active (early spring or fall). The primary exit points for roosting bats shall be identified, and all secondary ingress/egress locations shall be covered with a tarp, wood planks, or other methods, as directed by the bat biologist, to prevent bats from leaving from other locations. The primary exit point shall remain uncovered to allow exclusion devices to be installed. Exclusion devices may consist of a screen (poly netting, window screen, or fiberglass screening), foam, wood, or backer rods installed at the primary exit point, so bats are not able to return to the roost after emerging.

The exclusion devices shall be installed under the direction of the bat biologist and shall be installed at night to increase the potential that bats are not in the roost. Once it is confirmed by the bat biologist that all primary and secondary exit/entrance points have been covered and the exclusion devices are properly in place, a 1-week exclusion period shall commence. A passive acoustic monitoring detector shall be deployed during the 1-week exclusion period in order to monitor if bat activity has decreased during the exclusion period. Periodic monitoring (1 or 2 evenings) by the bat biologist during the exclusion period should also be conducted to observe if any bats are still emerging from additional areas within the structure or tree to be removed. On the final night of the exclusion period, an active monitoring survey should be conducted to ensure that no bats are emerging from the structure or tree and to confirm that exclusion has been successful. Continued presence of bats at roost site that is to be removed shall require an adjustment to the exclusion devices and schedule. The exclusion devices shall remain in place until the start of removal activities. After the initial bat survey, if any additional roost sites are identified, additional exclusion shall be required and follow the same methodology described in this mitigation measure.

MM-BIO-2 Sensitive Vegetation Communities Protection and Replacement. Sensitive vegetation communities that may be directly or indirectly impacted during individual project implementation, as determined by a qualified biologist, shall be demarcated using a Global Positioning System with submeter accuracy and flagged in the field with high-visibility tape or similar. Direct impacts to sensitive vegetation communities shall be avoided and a qualified biologist shall delineate an appropriate avoidance buffer around the communities, within which construction activities shall be prohibited to avoid indirect impacts to these resources. A qualified biologist shall recommend construction best management practices required to avoid or minimize indirect impacts to sensitive vegetation communities near construction activities. Best Management Practices could include but are not limited to temporary soil stabilization and erosion controls, water trucks or similar to control fugitive dust, spill prevention measures such as secondary containment, installation of fiber rolls on exposed slopes, and silt fencing. If avoidance of direct or indirect impacts to sensitive vegetation communities is not feasible, and if the project-specific analysis determines the impact to be significant absent mitigation, restoration of temporarily impacted areas and compensatory mitigation for permanent impacts shall be required as follows.

1) Sensitive vegetation communities that are temporarily impacted during construction of individual projects shall be restored to their original condition. Cal Poly Pomona shall prepare and implement a conceptual restoration plan detailing the methods of revegetation, success criteria, and monitoring and maintenance requirements to ensure mitigation success.
2) The permanent loss of sensitive vegetation communities during construction shall be mitigated at a minimum 1:1 ratio, with the final required mitigation ratio to consider acreage, functions, and values of the impacted community and the mitigation lands. Mitigation shall be achieved through on-site or off-site conservation of habitat and/or purchase of appropriate credits at an approved mitigation bank. For all conserved lands, a Conservation Management Plan shall be prepared by a qualified botanist and reviewed and approved by Cal Poly Pomona prior to individual project implementation. The plan shall include, at a minimum:
    a) Detailed methods of preservation, enhancement, rehabilitation, and/or propagation and planting shall be described, as appropriate

b) Success criteria and long-term monitoring and management requirements to ensure mitigation success

c) Adaptive management and remedial measures in the event that success criteria are not achieved

d) Responsible parties and funding sources shall be identified for any mitigation lands required to be conserved in perpetuity

MM-BIO-3 Nesting Bird Avoidance. Construction activities that could directly or indirectly impact nesting birds, as determined by a qualified biologist, including loggerhead shrike, yellow warbler, and white-tailed kite, as well as birds protected under the Migratory Bird Treaty Act and/or California Fish and Game Code, shall be conducted outside of the typical breeding season of February 1–September 15 (January 1–June 30 for nesting raptors). If the breeding season cannot be avoided, a pre-construction survey for nesting birds shall be conducted within the proposed disturbance limits, plus a 500-foot buffer, no more than 72 hours prior to construction. Pre-construction nesting bird surveys shall be conducted by a qualified biologist and shall be repeated if there is a pause in construction activities lasting more than 3 days.

If an active bird nest is determined to be present within the survey area, a qualified biologist shall delineate an appropriate buffer around the nest, within which construction activities shall be avoided until the nest is no longer active, as determined by a qualified biologist. The size of the avoidance buffer shall be determined by the qualified biologist based on the sensitivity of the species, location of the nest, and nature of construction activities. The location of the nest and the avoidance buffer shall be depicted on the construction plans and the information provided to the construction supervisor and any personnel working near the buffer. A qualified biologist shall monitor active nests near construction activities for signs of disturbance and shall adjust the size of any avoidance buffers if needed to avoid disturbance to breeding activities of special-status birds or birds protected under the Migratory Bird Treaty Act and/or California Fish and Game Code.

Suitable habitat for special-status bird species that is temporarily impacted during construction of individual projects shall be restored to its original condition. Cal Poly Pomona shall prepare and implement a conceptual restoration plan detailing the methods of revegetation, success criteria, and monitoring and maintenance requirements to ensure mitigation success. The permanent loss of suitable habitat shall be mitigated through 1:1 habitat replacement of equal or better functions and values to those impacted by the project. Mitigation shall be achieved through on-site or off-site conservation of habitat and/or purchase of appropriate credits at an approved mitigation bank.

MM-BIO-4 Biological Monitoring. For individual projects that could directly or indirectly impact special-status plant or wildlife species, special-status species' habitat, birds protected under the Migratory Bird Treaty Act and/or California Fish and Game Code, or sensitive vegetation communities, as determined by a qualified biologist, a biological monitor shall be present to monitor initial ground-disturbing activities and ensure compliance with all mitigation measures. The biological monitor shall: (1) be knowledgeable and experienced in the biology and natural history of local plant and wildlife resources; (2) be able to identify resources that are or have the potential to be present on the project site; and (3) have previous biological monitoring experience on construction projects.

MM-BIO-5 Worker Education and Awareness Program (WEAP). For individual projects that could directly or indirectly impact special-status plant or wildlife species, special-status species' habitat, or sensitive vegetation communities, as determined by a qualified biologist, prior to initial ground

disturbance, all personnel associated with those activities shall attend a worker education and awareness program (WEAP) conducted by a qualified biologist. In general, the WEAP shall discuss any potentially occurring sensitive biological resources in the area and potential construction-related impacts, protection measures, and project limits. Legal protections and regulations pertinent to the biological resources that may be present shall also be included in the program. A species and habitat fact sheet shall be developed prior to the training program and distributed at the training program to all contractors, employers and other personnel involved with the construction of the project.

MM-BIO-6 Demarcation of Disturbance Limits. Prior to ground disturbance for each individual project, the limits of disturbance shall be clearly demarcated using high-visibility construction fencing to prevent inadvertent disturbance to sensitive biological resources. The fencing shall be maintained throughout the duration of all construction activities.

MM-BIO-7 Open Space Protection. To minimize the potential for indirect impacts to biological resources in the Voorhis Ecological Reserve and adjacent open space areas, the following measures shall be implemented.

A. **Access Controls and Signage.** Cal Poly Pomona shall conduct an assessment to identify necessary access controls and to minimize the potential impacts associated with increased usage of open space areas. In some cases, structures such as permanent fencing may be required to control access into open space areas. The assessment shall be submitted to Cal Poly Pomona for review and approval prior to development.

   Educational signage and materials shall be created by a qualified biologist to enhance public awareness among students, faculty, and visitors to campus about the sensitive biological resources contained within the open space and to encourage public behavior that contributes to protecting those resources over the long-term. Signs shall be installed and maintained at trailheads where open space areas meet developed portions of the campus and shall, at a minimum, describe and/or illustrate the importance of the adjacent habitat area and prohibit trespass (where appropriate), motor vehicle entry, dumping of trash or other waste, off-leash pets, collection of plants, and the feeding, capture, or harassment of wildlife.

B. **Invasive Plant Controls.** Cal Poly Pomona shall prepare a comprehensive adaptive landscaping and weed control plan (LWCP). The LWCP shall be implemented within the landscaped areas of Master Plan projects to minimize weed invasion into open space areas. The LWCP shall be submitted to Cal Poly Pomona for review and approval prior to development and shall include, at a minimum, the following:

   a) Weed control treatments shall include legally permitted herbicide, manual, and mechanical methods approved for application. The application of herbicides shall comply with state and federal laws and regulations under the prescription of a Pest Control Advisor and shall be implemented by a Licensed Qualified Applicator. Herbicides shall not be applied during or within 72 hours of a forecasted measurable rain event or during high wind conditions (greater than 7 miles per hour) that could cause spray drift onto native vegetation. Where manual or mechanical methods are used, plant debris shall be disposed of at an appropriate off-site location. The timing of the weed control treatment shall be determined for each plant species with the goal of controlling populations before they start producing seeds.

b) Invasive plant species (California Invasive Plant Council moderate and high ratings) that could establish in open space areas shall not be included in landscaping plans.

c) All seeds and straw materials used during project construction and operation shall be weed-free rice straw or other weed-free product, and all gravel and fill material shall be weed free. If straw wattles are used, they shall not be encased in plastic mesh. All plant materials used during restoration shall be native, certified weed free, and approved by Cal Poly Pomona.

d) Prior to entry to the project site for the first time, equipment must be free of soil and debris on tires, wheel wells, vehicle undercarriages, and other surfaces (a high-pressure washer and/or compressed air may be used to ensure that soil and debris are completely removed). Compliance with the provision is achieved by on-site inspection and verification or by demonstrating that the vehicle or equipment has been cleaned at a commercial vehicle or appropriate truck washing facility. In addition, the interior of equipment (cabs, etc.) shall be free of mud, soil, gravel, and other debris (interiors may be vacuumed or washed).

C. **Lighting Controls.** Construction activities shall be limited to the time between dawn and dusk. If construction activity must occur outside of these time constraints, down shielding or directional lighting shall be used to minimize light spill into adjacent areas.

Outdoor development-related lighting shall be low-intensity, downcast luminaries with light patterns directed away from open space areas to minimize night illumination of adjacent wildlife habitat.

MM-BIO-8 Aquatic Resource Permitting and Mitigation. For individual projects that may directly or indirectly impact jurisdictional aquatic resources, as determined by a qualified biologist, prior to the start of construction, Cal Poly Pomona shall coordinate with the USACE, Los Angeles RWQCB (Region 4), and CDFW to ensure regulatory compliance related to jurisdictional aquatic resources and obtain any necessary permits and/or agreements pursuant to Sections 401 and 404 of the federal Clean Water Act (CWA), the Porter–Cologne Water Quality Control Act (waste discharge requirement), and California Fish and Game Code Section 1602.

Mitigation for impacts to jurisdictional resources shall be at a minimum 1:1 ratio, to offset the loss of beneficial uses, functions, and values and ensure no net loss of aquatic resources. Mitigation shall be completed through: (1) the purchase of credits at an approved mitigation bank; or (2) other mitigation developed by Cal Poly Pomona. Final mitigation ratios and credits, if applicable, shall be determined in consultation with the USACE, RWQCB and/or CDFW based on agency evaluation of current resource functions and values and through each agency's respective permitting process. If mitigation is proposed outside of an approved mitigation bank by Cal Poly Pomona (Option 2 above), a Habitat Mitigation and Monitoring Plan (HMMP) shall be prepared and approved by the regulatory agencies. The HMMP shall include a conceptual planting plan including planting zones, grading, and irrigation, as applicable; a conceptual planting palette; a long-term maintenance and monitoring plan; annual reporting requirements; and proposed success criteria.

Best management practices shall be implemented to avoid any indirect impacts on jurisdictional waters, including the following:

- Vehicles and equipment shall not be operated in ponded or flowing water except as described in permits.

- Water containing mud, silt, or other pollutants from grading or other activities shall not be allowed to enter jurisdictional waters or be placed in locations that may be subjected to high storm flows.
- Spoil sites shall not be located within 30 feet from the boundaries of jurisdictional waters or in locations that may be subject to high storm flows, where spoils might be washed back into drainages.
- Raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances that could be hazardous to vegetation or wildlife resources resulting from project-related activities shall be prevented from contaminating the soil and/or entering avoided jurisdictional waters.
- No equipment maintenance shall be performed within 100 feet of jurisdictional waters, including wetlands and riparian areas, where petroleum products or other pollutants from the equipment may enter these areas. Fueling of equipment shall not occur on the project site.

4.4.6 Level of Significance After Mitigation

Implementation of MM-BIO-1, MM-BIO-2, MM-BIO-3, MM-BIO-4, MM-BIO-5, MM-BIO-6, MM-BIO-7A, MM- BIO-7B, MM-BIO-7C, and MM-BIO-8 would reduce all potentially significant impacts of the proposed Master Plan, including near-term projects, to **less than significant**.

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4.5 Cultural Resources – Archaeological Resources

The following analysis identifies potential impacts to archaeological cultural resources resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing archaeological cultural resources within the proposed Master Plan area, discusses the regulatory setting, evaluates potential impacts to these cultural resources, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts. This section is based on an Archaeological Resources Inventory Report prepared by Dudek in April 2025 in support of the proposed Master Plan (Appendix D-1). See Section 4.6, Cultural Resources - Historical Resources, for separate discussion of historical built environment resources. See Section 4.18, Tribal Cultural Resources, for separate discussion of the potential for presence of those resources, potential impacts, and required mitigation measures.

No comments related to cultural resources were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are provided in Appendix A.

4.5.1 Environmental Setting

4.5.1.1 Existing Conditions

The existing Cal Poly Pomona main campus is located partially within the jurisdictional boundaries of the cities of Pomona and Walnut, as well as partially within unincorporated areas of Los Angeles County, California. The campus falls within Sections 27 and 28 of Township 1 South and Range 9 West of the *San Dimas, California* USGS 7.5-minute Quadrangle map.

The area of potential impacts (API) for archaeological resources (archaeological API) includes the area of direct physical effect for the project, with an added 25-foot buffer, consisting of a total area of 373 acres as delineated in Figure 4.5-1, API for Archaeological Resources. The archaeological API is assumed to cover all the projects contemplated under the proposed Master Plan.

4.5.1.2 Prehistoric Setting

Evidence for continuous human occupation in Southern California spans the last 10,000 years. The development of several cultural chronologies over this broad period has been largely based on the assessment of archaeological assemblages (a group or collection of artifacts that are related in some way, often found together in the same context). To be more inclusive, this research employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1769), and Ethnohistoric (post-AD 1769).

Paleoindian Period (pre – 5500 BC)

Evidence for Paleoindian occupation in the region is tenuous. Knowledge of associated cultural pattern(s) is informed by a relatively sparse body of data that has been collected from within an area extending from coastal San Diego, through the Mojave Desert, and beyond. One of the earliest dated archaeological assemblages in the region is located in coastal Southern California (although contemporaneous sites are present in the Channel Islands) derives from a human burial found in La Jolla (site trinomial CA-SDI-4669/W-12). A human burial from SDI-4669 was radiocarbon dated to 9,590–9,920 years before present (95.4% probability) (Hector 2006). The burial

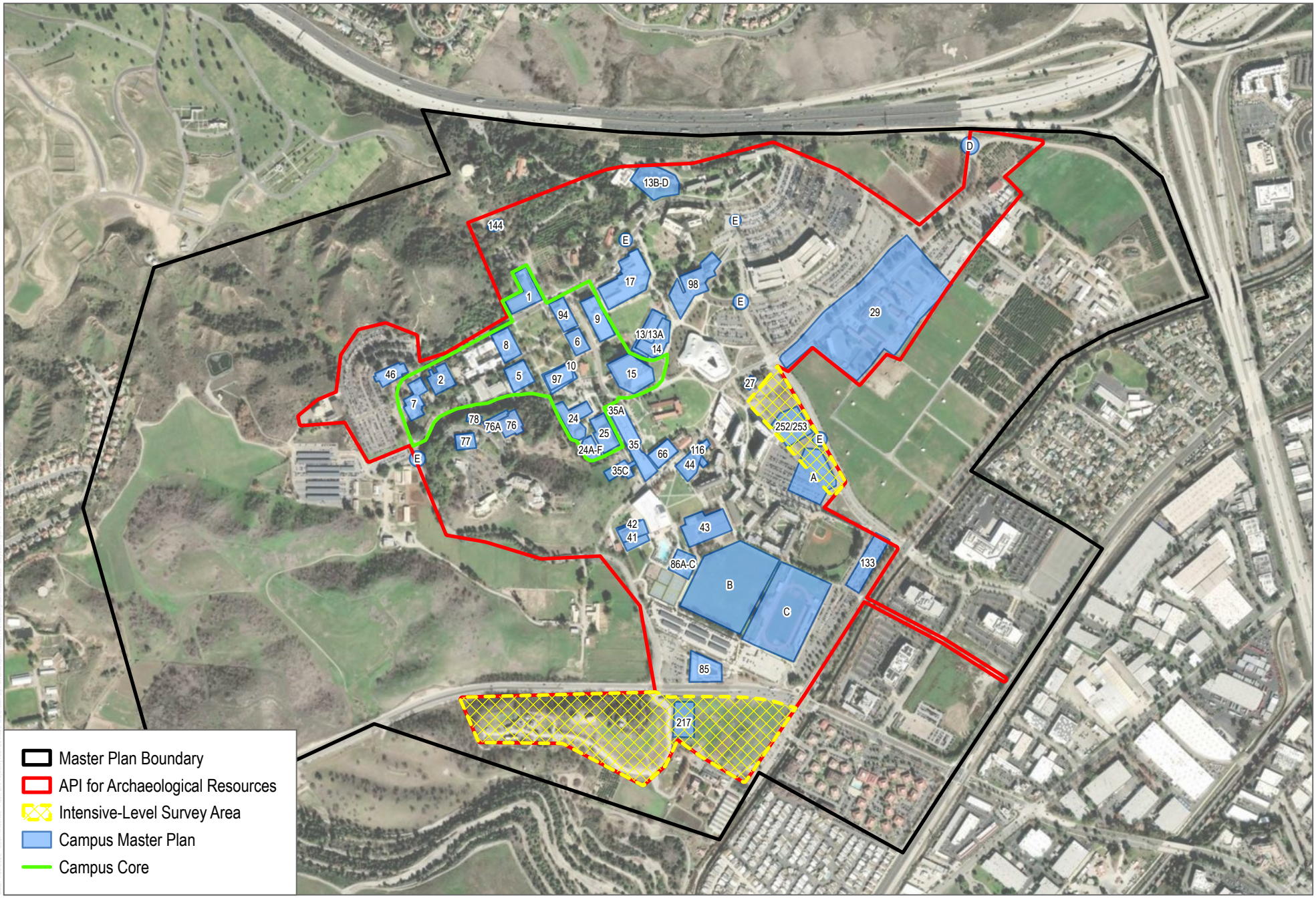
is part of a larger site complex that contained more than 29 human burials associated with an assemblage that fits the Archaic profile (i.e., large amounts of ground stone, battered cobbles, and expedient flake tools). In contrast, typical Paleoindian assemblages include large-stemmed projectile points, high proportions of formal lithic tools, bifacial lithic reduction strategies, and relatively small proportions of ground stone tools. Prime examples of this pattern are sites that were studied by Emma Lou Davis (1978) on Naval Air Weapons Station China Lake near Ridgecrest, California. These sites contained fluted and unfluted stemmed points and large numbers of formal flake tools (e.g., shaped scrapers, blades). Other typical Paleoindian sites include the Komodo site (MNO-679)—a multi-component fluted point site, and MNO-680—a single component Great Basined Stemmed point site (see Basgall et al. 2002). At MNO-679 and -680, ground stone tools were rare while finely made projectile points were common.

Warren et al. (2004) claimed that a biface manufacturing tradition present at the Harris site complex (SDI-149) is representative of typical Paleoindian occupation in the San Diego region that possibly dates between 10,365 and 8200 BC (Warren et al. 2004). Termed San Dieguito (see also Rogers 1945), assemblages at the Harris site are qualitatively distinct from most others in region because the site has large numbers of finely made bifaces (including projectile points), formal flake tools, a biface reduction trajectory, and relatively small amounts of processing tools (see also Warren 1968). Despite the unique assemblage composition, the definition of San Dieguito as a separate cultural tradition is hotly debated. Gallegos (1987) suggested that the San Dieguito pattern is simply an inland manifestation of a broader economic pattern. Gallegos's interpretation of San Dieguito has been widely accepted in recent years, in part because of the difficulty in distinguishing San Dieguito components from other assemblage constituents. In other words, it is easier to ignore San Dieguito as a distinct socioeconomic pattern than it is to draw it out of mixed assemblages.

The large number of finished bifaces (i.e., projectile points and non-projectile blades), along with large numbers of formal flake tools at the Harris site complex, is very different than nearly all other assemblages throughout the region, regardless of age. Warren et al. (2004) made this point, tabulating basic assemblage constituents for key early Holocene sites. Producing finely made bifaces and formal flake tools implies that relatively large amounts of time were spent for tool manufacture. Such a strategy contrasts with the expedient flake-based tools and cobble-core reduction strategy that typifies non-San Dieguito Archaic sites. It can be inferred from the uniquely high degree of San Dieguito assemblage formality that the Harris site complex represents a distinct economic strategy from non-San Dieguito assemblages.

San Dieguito sites are rare in the inland valleys, with one possible candidate, RIV-2798/H, located on the shore of Lake Elsinore. Excavations at Locus B at RIV-2798/H produced a toolkit consisting predominately of flaked stone tools, including crescents, points, and bifaces, and lesser amounts of ground stone tools, among other items (Grenda 1997). A calibrated and reservoir-corrected radiocarbon date from a shell produced a date of 6630 BC. Grenda (1997) suggested this site represents seasonal exploitation of lacustrine resources and small game and resembles coastal San Dieguito assemblages and spatial patterning.

If San Dieguito truly represents a distinct socioeconomic strategy from the non-San Dieguito Archaic processing regime, its rarity implies that it was not only short-lived, but that it was not as economically successful as the Archaic strategy. Such a conclusion would fit with other trends in Southern California deserts, where hunting-related tools were replaced by processing tools during the early Holocene (see Basgall and Hall 1990).



SOURCE: California State Polytechnic University, Pomona 2024; World Imagery

DUDEK

0 500 1,000 Feet

FIGURE 4.5-1

Archaeological Resources Survey Area

Cal Poly Pomona Campus Master Plan EIR

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Archaic Period (8000 BC – AD 500)

The more than 2,500-year overlap between the presumed age of Paleoindian occupations and the Archaic period highlights the difficulty in defining a cultural chronology in Southern California. If San Dieguito is the only recognized Paleoindian component in the coastal Southern California, then the dominance of hunting tools implies that it derives from Great Basin adaptive strategies and is not necessarily a local adaptation. Warren et al. (2004) admitted as much, citing strong desert connections with San Dieguito. Thus, the Archaic pattern is the earliest local socioeconomic adaptation in the region (see Hale 2001, 2009).

The Archaic pattern, which has also been termed the Millingstone Horizon (among others), is relatively easy to define with assemblages that consist primarily of processing tools, such as millingstones, handstones, battered cobbles, heavy crude scrapers, incipient flake-based tools, and cobble-core reduction. These assemblages occur in all environments across the region with little variability in tool composition. Low assemblage variability over time and space among Archaic sites has been equated with cultural conservatism (see Basgall and Hall 1990; Byrd and Reddy 2002; Warren 1968; Warren et al. 2004). Despite enormous amounts of archaeological work at Archaic sites, little change in assemblage composition occurred until the bow and arrow was adopted around AD 500, as well as ceramics at approximately the same time (Griset 1996; Hale 2009). Even then, assemblage formality remained low. After the bow was adopted, small arrow points appear in large quantities and already low amounts of formal flake tools are replaced by increasing amounts of expedient flake tools. Similarly, shaped millingstones and handstones decreased in proportion relative to expedient, unshaped ground stone tools (Hale 2009). Thus, the terminus of the Archaic period is equally as hard to define as its beginning because basic assemblage constituents and patterns of manufacturing investment remain stable, complemented only by the addition of the bow and ceramics.

Late Prehistoric Period (ad 500 – 1769)

The period of time following the Archaic and before Ethnohistoric times (AD 1769) is commonly referred to as the Late Prehistoric (Rogers 1945; Wallace 1955; Warren et al. 2004); however, several other subdivisions continue to be used to describe various shifts in assemblage composition. In general, this period is defined by the addition of arrow points and ceramics, as well as the widespread use of bedrock mortars. The fundamental Late Prehistoric assemblage is very similar to the Archaic pattern but includes arrow points and large quantities of fine debitage from producing arrow points, ceramics, and cremations. The appearance of mortars and pestles is difficult to place in time because most mortars are on bedrock surfaces. Some argue that the Ethnohistoric intensive acorn economy extends as far back as AD 500 (Bean and Shipek 1978). However, there is no substantial evidence that reliance on acorns, and the accompanying use of mortars and pestles, occurred before AD 1400. Millingstones and handstones persisted in higher frequencies than mortars and pestles until the last 500 years (Basgall and Hall 1990); even then, weighing the economic significance of millingstone-hand stone versus mortar-pestle technology is tenuous due to incomplete information on archaeological assemblages.

4.5.1.3 Ethnographic Setting

The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later Mission period and early ethnographic accounts. The first records of the Native American inhabitants of the region come predominantly from European merchants, missionaries, military personnel, and explorers. These brief, and generally peripheral, accounts were prepared with the intent of furthering respective colonial and economic aims and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The

establishment of the missions in the region brought more extensive documentation of Native American communities, although these groups did not become the focus of formal and in-depth ethnographic study until the early twentieth century (Geiger and Meighan 1976; Harrington 1935; Laylander 2000; Boscana 1846; Kroeber 1923, 1925; Du Bois 1905, 1906).The principal intent of these researchers was to record the precontact, culturally specific practices, ideologies, and languages that had survived the destabilizing effects of missionization and colonialism. This research, often understood as "salvage ethnography," was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his "memory culture" approach (Lightfoot 2005) by recording languages and oral histories within the region. Ethnographic research by Dubois, Kroeber, Harrington, and others during the early twentieth century seemed to indicate that traditional cultural practices and beliefs survived among local Native American communities.

It is important to note that even although there were many informants for these early ethnographies who were able to provide information from personal experiences about native life before the Europeans, a significantly large proportion of these informants were born after 1850 (Heizer and Nissen 1973); therefore, the documentation of pre-contact, aboriginal culture was increasingly supplied by individuals born in California after considerable contact with Europeans. As Robert F. Heizer (1978) stated, this is an important issue to note when examining these ethnographies, since considerable culture change had undoubtedly occurred by 1850 among the Native American survivors of California.

Tongva (Gabrielino)

The ethnohistoric (and to a lesser degree, archaeological) record indicates that the proposed Master Plan area was occupied by the Tongva (Gabrielino). Surrounding cultural groups included the Chumash and Tataviam to the north and west, the Serrano and Cahuilla to the north and east, and the Juaneño/Acjachemen and Luiseño to the south and east.

The name "Gabrielino" (also spelled "Gabrieliño," "Gabrieleño," and "Gabrileño") refers to the Indigenous people of the Los Angeles Basin and surrounding areas who were conscripted by the Spanish to construct and attend Mission San Gabriel Arcángel, established in 1771. Tongva (Gabrielino) lands encompassed the greater Los Angeles Basin and four Channel Islands: Santa Catalina, San Clemente, Santa Barbara, and San Nicolas. The Tongva (Gabrielino) established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast, stretching from the foothills of the San Gabriel Valley to the Pacific Ocean. The total tribal population has been estimated to have been at least 5,000, but recent ethnohistoric work suggests a number approaching 10,000 (O'Neil 2002). Houses constructed by the Tongva (Gabrielino) were large, circular, domed structures made of willow poles thatched with tule that could hold up to 50 people (Bean and Smith 1978). Indeed, the word *kiiy* was the word used by many Tongva (Gabrielino) to refer to these houses (Heizer 1968; Johnston 1962). Other structures served as sweathouses, menstrual huts, ceremonial enclosures, and probably communal granaries. Cleared fields for races and games were created adjacent to Tongva (Gabrielino) villages (McCawley 1996). Archaeological sites composed of villages with various sized structures have been identified.

The largest, and best documented, ethnographic Tongva (Gabrielino) settlement was Yaanga (also known as Yaangna, Janga, and Yabit), which was in the vicinity of downtown Los Angeles (McCawley 1996; NEA and King 2004). This settlement was reportedly first encountered by the Portola expedition in 1769. Yaanga provided a large number of individuals to Mission San Gabriel (established 1771 in current day Whittier Narrows area); however, following the founding of the Pueblo of Los Angeles in 1781, opportunities for local paid work became increasingly common, which had the result of reducing the number of Native American neophytes from the immediately surrounding area (NEA and King 2004). Mission records indicate that Tongva (Gabrielino) inhabitants of Yaanga

were brought to Mission San Gabriel (NEA and King 2004; King 2000). Based on this information, Yaanga may have been the most populated village in the western Tongva (Gabrielino) territory.

In light of existing documentary and archaeological evidence, the Tongva (Gabrielino) subsistence economy was centered on hunting, gathering, and fishing and largely based on the local ecology of area. The surrounding environment was rich and varied, and people exploited mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. Like that of most Native Californians, acorns were a staple food. Acorns were supplemented by the roots, leaves, seeds, and fruits of a wide variety of flora (e.g., islay, cactus, yucca, sages, and agave). Freshwater and saltwater fish, shellfish, birds, reptiles, and insects, as well as large and small mammals (both terrestrial and marine), were also consumed (McCawley 1994a; Reddy et al. 2016; Reddy 2015; Kroeber 1925; Bean and Smith 1978; McCawley 1996).

A wide variety of tools and implements were used by the Tongva (Gabrielino) to gather and collect food. These included the bow and arrow, traps and snares, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Groups residing near the ocean used oceangoing plank canoes and tule balsa canoes for fishing, travel, and trade between the mainland and the Channel Islands (McCawley 1996). Tongva (Gabrielino) people processed food with a variety of tools, including hammerstones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used (and refashioned) to make ollas and cooking vessels (Blackburn 1963; Kroeber 1925; McCawley 1996).

Deceased Tongva (Gabrielino) were either buried or cremated, with inhumation more common on the Channel Islands and the neighboring mainland coast with cremation predominant on the remainder of the coast and in the interior (Harrington 1942; McCawley 1996). Cremation ashes have been found in archaeological contexts buried with stone bowls and in shell dishes (Ashby and Winterbourne 1966), as well as scattered among broken ground stone implements (Cleland, York, and Willey 2007). Archaeological data such as these correspond with ethnographic descriptions of an elaborate mourning ceremony that included a wide variety of offerings, including seeds, stone grinding tools, otter skins, baskets, wood tools, shell beads, bone and shell ornaments, and projectile points and knives. Offerings varied with the gender and status of the deceased (Johnston 1962; McCawley 1996). At the behest of the Spanish missionaries, cremation essentially ceased during the post-contact period (McCawley 1996).

To date, perhaps the most exceptional accounts of Tongva (Gabrielino) belief, custom, folk-lore, and language prior to the modern era come from two elaborate sources: a series of 22 letters written for the Los Angeles Star in 1852 by Hugo Reid, a Scottish immigrant to California, who transcribed the memories of his wife, Victoria Bartolomea Reid, a Tongva (Gabrielino) woman from the Comicrabit rancheria (Heizer 1968), and interviews conducted in 1903 with Mrs. James Rosemyer (Narcissa Higuera), a Tongva (Gabrielino) woman who then resided in Bakersfield (Merriam 1955). These manuscripts include (among other things) delicate, poetic, and dramatic accounts about the purpose and disposition of plants and animals in the Tongva (Gabrielino) world, spirituality, social hierarchy, mortuary custom, naming convention, song, and many other aspects of Tongva (Gabrielino) world life, as well as accounts and assessments of the atrocities visited upon these people by the friars and soldiers of Spanish Mission imperialism (also see Welch 2006).

Sadly, much of the Tongva (Gabrielino) world language has been lost since the 1930s, although enough survives in the written record to permit classification of it as part of the Takic subgroup of the Uto-Aztecan language family, closely related to the languages of neighboring peoples, including the Serrano, Kitanemuk, Tataviam, Luiseño, Juaneño/Acjachemen, Cahuilla, and Cupeño, which are together related to other languages of the Northern Uto-Aztecan branch that includes the Numic, Tubatulabal, and Hopi languages (Golla 2011). The formal morphology of

the language has been summarized by UCLA linguistics professor Pamela Munro (Munro 2000), and a comprehensive dictionary of Tongva (Gabrielino) language based on the notes of J. P. Harrington is under revision by Munro in collaboration with Tongva (Gabrielino) scholars.

4.5.2 Regulatory Setting

4.5.2.1 Federal

There are no federal cultural resources laws, regulations, plans, ordinances, or policies applicable to the proposed Master Plan.

4.5.2.2 State

California Register of Historic Resources

In California, the term "historical resource" includes, but is not limited to, "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC Section 5020.1[j]). In 1992, the California legislature established the California Register of Historical Resources (CRHR) "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Place (NRHP), enumerated as follows: According to California Public Resources Code (PRC) Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity" and (ii) meets at least one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Environmental Quality Act

The following CEQA statutes (PRC Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.) are of relevance to the analysis of archaeological, historic, and Tribal Cultural Resources (TCRs):

- PRC Section 21083.2(g) defines "unique archaeological resource."
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines "historical resources." In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change in the significance of an historical resource"; it also defines the circumstances when a project would materially impair the significance of a historical resource.
- PRC Section 21074(a) defines "Tribal Cultural Resources."
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated cemetery.
- PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (PRC Section 21084.1; 14-CCR 15064.5[b]).

A "substantial adverse change in the significance of an historical resource," reflecting a significant effect under CEQA, means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (14- CCR 15064.5[b][1]; PRC Section 5020.1[q]). In turn, the significance of a historical resource is materially impaired when a project does any of the following (14 CCR 15064.5[b][2]):

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register [CRHR]; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any historical resources, then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance would be materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2[a]–[c]).

PRC Section 21083.2(g) defines a *unique archaeological resource* as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria (PRC Section 21083.2[g]):

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts on non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2[a]; 14 CCR 15064.5[c][4]). However, if a non-unique archaeological resource qualifies as a TCR (PRC Sections 21074[c] and 21083.2[h]), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed in PRC Section 5097.98.

Native American Historic Cultural Sites (California Public Resources Code Section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the Native American Heritage Commission (NAHC) to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to 1 year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR. See Section 4.18, Tribal Cultural Resources, for separate discussion of the potential presence of these resources.

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Repatriation Act), enacted in 2001, required all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California Repatriation Act also provides a process for the identification and repatriation of these items to the appropriate tribes.

California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98.

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County Coroner has examined the remains (California Health and Safety Code Section 7050.5[b]). If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (California Health and Safety Code Section 7050.5[c]). In accordance with California Public Resources Code Section 5097.98(a), the NAHC will notify the Most Likely Descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. Within 48 hours of being granted access to the site, the MLD may recommend means of treatment or disposition, with appropriate dignity, of the human remains and associated grave goods.

Assembly Bill 52

Assembly Bill (AB) 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that TCRs must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American tribe and that is either:

- On or determined to be eligible for the California Register of Historical Resources or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project site, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Section 1(a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to TCRs, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

See Section 4.18, Tribal Cultural Resources, for separate discussion of the potential presence of these resources, potential impacts, and required mitigation measures.

Guidelines for Determining Significance

According to CEQA (Section15064.5b), a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. CEQA defines a substantial adverse change:

> Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

The significance of an historical resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR; or
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

Section 15064.5(c) of CEQA applies to effects on archaeological sites and contains the following additional provisions regarding archaeological sites:

- When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- If a lead agency determines that the archaeological site is a historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- If an archaeological site does not meet the criteria defined in subsection (a) but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.
- If an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or Environmental Impact Report (EIR), if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

Section 15064.5(d) and (e) contain additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) provides:

> When an initial study identifies the existence of, or the probable likelihood of, Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code SS5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials

with the appropriate Native Americans as identified by the Native American Heritage Commission. Action implementing such an agreement is exempt from:

1. The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5); and
2. The requirement of CEQA and the Coastal Act.

Under CEQA, an EIR is required to evaluate any impacts on unique archaeological resources (California Public Resources Code Section 21083.2). A "unique archaeological resource" is defined as:

> [A]n archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
>
> 1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
> 2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
> 3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

(California Public Resources Code Section 21083.2(g)). An impact to a non-unique archaeological resource is not considered a significant environmental impact and such non-unique resources need not be further addressed in the EIR (Public Resources Code Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)).

As stated above, CEQA contains rules for mitigation of "unique archaeological resources." For example, "[i]f it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:

1. Planning construction to avoid archaeological sites.
2. Deeding archaeological sites into permanent conservation easements.
3. Capping or covering archaeological sites with a layer of soil before building on the sites.
4. Planning parks, greenspace, or other open space to incorporate archaeological sites." (Pub. Resources Code Section 21083.2(b)(1)-(4).)

Public Resources Code Section 21083.2(d) states that "[e]xcavation as mitigation shall be restricted to those parts of the unique archaeological resource that would be damaged or destroyed by the project. Excavation as mitigation shall not be required for a unique archaeological resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, if this determination is documented in the environmental impact report."

The rules for mitigating impacts to archaeological resources to qualify as "historic resources" are slightly different. According to CEQA Guidelines Section 15126.4(b), "[p]ublic agencies should, whenever feasible, seek to avoid damaging effects on any historic resource of an archaeological nature. The following factors shall be considered and discussed in an EIR for a project involving such an archaeological site:

A. Preservation in place is the preferred manner of mitigating impacts to archaeological sites. Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.
B. Preservation in place may be accomplished by, but is not limited to, the following:
    1. Planning construction to avoid archaeological sites;
    2. Incorporation of sites within parks, greenspace, or other open space;
    3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site; and
    4. Deeding the site into a permanent conservation easement.

Thus, although Section 21083.2 of the Public Resources Code, in addressing "unique archaeological sites," provides for specific mitigation options "in no order of preference," CEQA Guidelines Section 15126.4(b), in addressing "historical resources of an archaeological nature," provides that "[p]reservation in place is the preferred manner of mitigating impacts to archaeological sites."

Under CEQA, "[w]hen data recovery through excavation is the only feasible mitigation," the lead agency may cause to be prepared and adopt a "data recovery plan," prior to any excavation being undertaken. The data recovery plan must make "provision for adequately recovering the scientifically consequential information from and about the historic resource." (CEQA Guidelines Section 15126.4(b)(3)(C).) The data recovery plan also "must be deposited with the California Historical Resources Regional Information Center." (*Ibid*.) Further, "[i]f an artifact must be removed during project excavation or testing, curation may be an appropriate mitigation." (*Ibid*.)

However, "[d]ata recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historic resource, provided that determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center." (CEQA Guidelines Section 15126.4(b)(3)(D)).

4.5.3 Thresholds of Significance and Methodology

4.5.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section15064.7). The significance criteria used to evaluate the proposed Master Plan's impacts to cultural resources are based on CEQA Guidelines Appendix G. A potentially significant impact to cultural resources would occur if the proposed Master Plan would:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to Section15064.5.
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section15064.5.

3. Disturb any human remains, including those interred outside of dedicated cemeteries.

4.5.3.2 Methodology

Records Search

A California Historical Research Information System (CHRIS) records search for the proposed Master Plan area and a 1-mile radius was completed on May 8, 2024, at the South Central Coastal Information Center (SCCIC). The SCCIC records search included a review of all previously recorded investigations and cultural resources. Overall, the records search indicates that eight (8) cultural resources have been previously recorded within a 1-mile radius. Of these, one historic (built environment) resource, P-19-186990, is located on the main campus (see Section 4.6, Cultural Resources - Historical Resources, for information about this site). The remaining seven (7) cultural resources within the records search radius include one (1) prehistoric site, one (1) historic-era site, and five (5) historic-era built environment resources (Table 4.5-1), none of which are on Cal Poly's main campus.

Table 4.5-1. Previously Recorded Cultural Resources within 1 Mile of Proposed Master Plan Area

Primary Number	Trinomial	Age	Description	Eligibility Status
Within Proposed Master Plan Area				
P-19-186990	—	Historic-era	Cal Poly Pomona's Laboratory Building 3	Recommended ineligible for NRHP and CRHR
Outside Proposed Master Plan Area				
P-19-000883	CA-LAN-000883	Prehistoric	Possible lithic-tool quarry site	Unknown
P-19-001867	CA-LAN-001867H	Historic-era	Phillips Ranch Mansion Site	Unknown
P-19-180724	—	Historic-era	Louis Phillips Mansion	Listed on NRHP under Criterion C
P-19-186112	—	Historic-era	Southern Pacific Railroad	Recommended eligible for NRHP under Criteria A and B
P-19-186869	—	Historic-era	Mount San Antonio College Campus	Recommended eligible for NRHP under Criteria A and C
P-19-189475	—	Historic-era	Water tank	Recommended ineligible for NRHP; Not evaluated for CRHR
P-19-192745	—	Historic-era	Remnants of a cattle chute, cattle corral, water trough, cattle gate, and dirt access road	Recommended ineligible for NRHP and CRHR

NAHC Sacred Lands File Search and Tribal Outreach

A NAHC search of the Sacred Lands File (SLF) was requested for the proposed Master Plan area. The NAHC replied via email on February 22, 2024, stating that the SLF search was completed and indicated a positive result for the presence of Native American cultural resources within 1 mile of the main campus. Additionally, the NAHC provided a list of Native American tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in the area. Informal tribal outreach letters were mailed on April 4, 2025[1], to all Native American group representatives included on the NAHC contact list. These letters attempted to solicit information relating to Native American resources that may be impacted by proposed Master Plan implementation. See also Section 4.18, Tribal Cultural Resources, for information about the AB 52 Consultation conducted for the proposed Master Plan.

Archival Research

Historical Maps and Photographs

Historical aerial photographs and historical topographic maps were reviewed to better understand the development of the proposed Master Plan area and surrounding vicinity over time. Historical aerial photographs (historical aerials) of the proposed Master Plan area are available from 1928 to 2020 (NETR 2024a; UCSB 2024). The earliest historical aerial from 1928 shows just the northern boundary of the proposed Master Plan area. There is a road where I-10 is currently located. The roads currently known as Mansion Lane, Olive Lane Walk, and Citrus Lane are also present. There are at least three structures along Mansion Lane, at least five structures north of Citrus Lane, the area north of Olive Lane Walk is in use as an orchard, and there is an orchard south of Citrus Lane. The 1934 historical aerial shows approximately 90%of the proposed Master Plan area, although the southern boundary is not visible. By 1934, the majority of the eastern portion of the proposed Master Plan area is in use as an orchard and there are various northeast to southwest trending roads. The majority of the western portion of the proposed Master Plan area is undeveloped with native trees present along the hill tops. The "U" shaped structure (formerly the Kellogg Ranch horse stables) located in the area currently known as Union Plaza atop Horseshoe Hill, is also present in the 1934 historical aerial. There are no substantial changes to the proposed Master Plan area as shown in the historic aerials until 1964. By 1964, the Cal Poly Pomona campus has expanded, with the majority of structures being along University Drive. West Temple Avenue also appears along the proposed Master Plan area's southern boundary. Over the next 50 years, the Cal Poly Pomona campus continues to expand throughout the proposed Master Plan area, with the development of additional buildings and roads. By 2016, the proposed Master Plan area appears as it does in present day (NETR 2024).

Historical topographic (topo) maps of the proposed Master Plan area are available for the years of 1897 to 2021 (NETR 2024b). The earliest historical topo from 1897 depicts the proposed Master Plan area as mostly undeveloped. The San Jose Wash intersects the eastern section of the proposed Master Plan area, the Southern Pacific Railroad is adjacent to the proposed Master Plan area's southeast boundary, an unnamed road intersects the southern section of the proposed Master Plan area, and four structures are scattered throughout the proposed Master Plan area. The 1898 to 1923 topo maps show no changes to the proposed Master Plan area. The 1927 topo map depicts both formal and informal roads intersecting the proposed Master Plan area, and five structures scattered throughout the proposed Master Plan area. The 1932 to 1946 topo maps show no changes to the proposed Master Plan area. By 1956, "California State Polytechnic College (Kellogg)" is depicted within the

[1] A typo was made in these letters regarding the year that the letters were mailed (2024); however, the letters were actually mailed on April 4, 2025.

proposed Master Plan area. The main structure is located north of the road currently identified as Eucalyptus Lane, where Union Plaza and Horseshoe Hill are currently located. The areas north of Olive Lane Walk, south of Eucalyptus Lane and east of South University Drive are depicted as orchards. The 1956 topo map also depicts "Mt. San Antonio Jr College" west of the proposed Master Plan area, while the San Jose Wash appears to be channelized, and four-lane highway labeled "Valley Boulevard" borders the proposed Master Plan area's southeast boundary. Additionally, the Southern Pacific Railroad and I-10 are present north of the proposed Master Plan area. By 1967, the orchards are no longer present, and the Cal Poly Pomona campus has expanded. The 1975 and 1984 topo maps show no changes to the proposed Master Plan area. The 2012 to 2021 topo maps do not depict any structures, but they do show an increase of roads within the proposed Master Plan area (NETR 2024b).

As evidenced by this archival review, the proposed Master Plan area has been subject to past disturbances associated with the development of agricultural fields throughout the first half of the twentieth century, and the development of the Cal Poly Pomona campus over the latter half of the twentieth century. Disturbances associated with these activities likely included mass grading, discing, and trenching, and hillside stabilization efforts. Additionally, there appears to be several structures historic in age located within Cal Poly Pomona.

Cal Poly Pomona Archives In 1975, The Poly Post, Cal Poly Pomona's student-run newspaper, published an article about cultural resources recovered during the construction of Cal Poly Pomona's Science Building 8 (College of Science) in the 1970s. It was reported that two metates were recovered from a depth of approximately 7 to 8 feet below surface grade, along an alluvial plain. The article also states that additional cultural resources were observed during the construction of Cal Poly Pomona's Engineering Building 9 and La Cienega Center Building 59, but the article does not describe the artifacts that were observed or the context they were in when encountered (The Poly Post 1975). A California Department of Parks and Recreation site form was prepared for this discovery and will be submitted to the SCCIC of the CHRIS at California State University, Fullerton.

In 1986, the Cal Poly Pomona sponsored radio station KWOW-AM, conducted an interview with Doctor Joan Greenway, professor of Anthropology and the Social Sciences Department at Cal Poly Pomona (Pierce 1986). During the interview, Dr. Greenway stated that Native American objects have been occasionally found during the construction of building foundations on campus throughout the years. Specifically, Dr. Greenway mentioned that "manos, metates, flints, arrowheads" and other artifacts were found during the construction of the science building (Building 8) (Pierce 1986).

Review of Geomorphological Context

According to the U.S. Department of Agriculture Natural Resources Conservation Services (USDA 2024a), several soil types are mapped within the proposed Master Plan area. Soil descriptions for the soil types identified within the majority of the proposed Master Plan area are provided below.

- Urban land soils are associated with human-transported materials (HTM), human-altered materials, or minimally altered or intact "native" soils, and are present in high population density and developed area/areas of built environment (USDA 2019); no official soil description for Urban Land soils is available through the USDA.
- Sorrento (USDA 2024b): Characterized as very deep, well-drained soils that formed in alluvium mostly from sedimentary rocks. Sorrento soils are found on alluvial fans and stabilized floodplains at elevations of 25 to 2,100 feet above mean sea level (amsl).

- Arbolado (USDA 2024c): Characterized as very deep, well-drained soils that formed in HTM that originate from alluvium derived from sedimentary sources. Arbolado soils are found on graded alluvial fans and graded floodplains at elevations of 10 to 1,640 feet amsl.
- Zaca (USDA 2024d): Characterized as deep, well-drained soils formed in material from weakly consolidated marine sediments. Zaca soils are found on gently rolling to very steep landscape positions at elevations of 200 to 2,000 feet amsl.
- Apollo (USDA 2024e): Characterized as deep, well-drained soils formed in material weathered from soft calcareous shale and soft sandstone. Apollo soils are found on low foothills adjacent to valley floors at elevations of 200 to 600 feet amsl.
- Biscailuz (USDA 2024f): Characterized as very deep, somewhat poorly drained soils that formed in alluvium from mixed rock sources. Biscailuz soils are found on floodplains and lowlands at elevations of 0 to 1,150 feet amsl.
- Pico (USDA 2024g): Characterized as deep, well-drained soils that formed in alluvium from mostly sedimentary rocks. Pico soils are found on floodplains and alluvial fans at elevations of 10 to 1,500 feet amsl.

The geotechnical report, Amended Geotechnical Investigation, Proposed Engineering Laboratories Replacement, Building 17, California State Polytechnic University, Pomona, California (Petra Geotechnical, Inc 1988), details a geotechnical investigation that took place on the Cal Poly Pomona Campus in November 1994. The report details the results of ten (10) exploratory auger borings (B1 through B-10), placed near the Cal Poly Pomona Building 17 (engineering laboratories), excavated using a hollow-stemmed auger. Subsurface exploratory borings extended to a maximum depth ranging from 21 feet to 36 feet below the ground surface (bgs). A variety of human-made fill soils were also noted, with minor fill depths (2-3 feet bgs) in B-1, B-4, B-7, B-8, and B-9, and more substantial fill soils (4-13 feet bgs) in B-2, B-3, B-5, B-6, and B-10. Colluvial deposits were encountered with each exploratory boring, and the deposits ranged in thickness from approximately 15 feet to over 34 feet bgs. Groundwater was encountered in B-4, B-6, B-8, B-9, and B-10 at depths from 4-6 feet bgs; groundwater was encountered in B-7 at 17 feet bgs and in B-5 at 26.5 feet bgs. Furthermore, bedrock was encountered at B-5 at a depth of 33 feet bgs and at B-10 at a depth of 20 ft bgs. No archaeological or Native American monitor was present nor were any cultural resources identified during this investigation.

The geotechnical report, *Preliminary Geotechnical Study: Library Expansion, California Polytechnic University, Pomona, California* (Geocon, Inc 2001), details a geotechnical investigation that took place on the Cal Poly Pomona Campus in November 2000. The report details the results of four (4) exploratory auger borings (B1 through B-4), placed near the University Library (Building 15), excavated using a truck-mounted drill rig using a bucket auger. Subsurface exploratory borings extended to a maximum depth ranging from 35 feet to 41 feet bgs. No archaeological or Native American monitor was present nor were any cultural resources identified during this investigation. The excavated borings are further described below:

- B-1 took place approximately 25-30 feet north of Olive Lane, south of the University Library, and encountered undocumented fill soil from 0-5 feet bgs and clayey siltstone from 5-35 feet bgs. B-1 was terminated at 35 feet bgs due to water present and soil caving.
- B-2 was excavated approximately 40-50 feet north of the southern loop of Olive Lane and encountered undocumented fill from 0-4.5 feet bgs, alluvial soils (clay, with some calcium carbonate at deeper levels) from 4.5-11 feet bgs, and claystone from 11-40 feet bgs. B-2 was terminated at 40 feet bgs due to water seepage.

- B-3 was excavated approximately 65-70 feet southwest of the northeastern curve of Olive Lane, which is likely where an extension to the library was built after the geotechnical investigation. B-3 encountered undocumented fill soil from 0-2 feet bgs, alluvial soils (mostly clay) from 2-9.5 feet bgs, claystone from 9.5-26 feet bgs, siltstone from 26-27.5 feet bgs, and claystone again from 27.5-36 feet bgs. B-3 was terminated at 36 feet bgs due to water seepage and the soil caving in.
- B-4 was excavated approximately 40 feet northwest of the library and east of Olive Lane. B-4 encountered undocumented fill soil from 0-4 feet bgs, alluvial soil (primarily coarse sand, but with some gravels) from 4-18 feet bgs, and claystone from 18-41 feet bgs. B-4 was terminated at 41 feet bgs due to water seepage and soil caving in.

The USDA's soil types mapped within the proposed Master Plan area and the geotechnical investigations that have taken place within the proposed Master Plan area demonstrate that alluvial soils are present, which have moderate potential to contain subsurface archaeological deposits.

Pedestrian Survey

A reconnaissance-level pedestrian survey of the archaeological API was conducted on May 31, 2024. Standard archaeological procedures and techniques consistent with the Secretary of the Interior's Professional Qualification Standards for Archaeology were employed during the survey. When possible, 10-meter (approximately 33-feet) interval systematic transects were conducted and oriented in cardinal direction. Where visible, the ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock, imported marine shell), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as rodent/reptile burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials, as were areas of exposed ground surface such as in landscaping beds and gardens.

The archaeological API is the Cal Poly Pomona main campus consisting of residential, administrative, and educational buildings, agricultural and equestrian facilities, fenced agricultural fields, a sports complex, vehicular roadways, paved parking lots, parking structures, courtyards, landscaping, and pedestrian pathways. A reconnaissance-level pedestrian survey was conducted across the majority of the archaeological API (90%) due to the built environment nature of the campus core and its associated facilities. Systematic transects were employed in two undeveloped areas with good ground surface visibility as indicated in Figure 4.5-1 (Intensive-Level Survey Area). This accounted for approximately 10% of the total archaeological API.

Ground surface visibility across the archaeological API ranged from non-existent to good (0-80%). Non-existent ground surface visibility (0%) was observed in areas covered by structures, hardscape, and landscaping. This accounted for approximately 85% of the total archaeological API and encompassed the majority of the campus core. Good ground surface visibility (50-80%) was observed within the fallow agricultural fields, undeveloped open spaces, and in some landscaping features the campus core. This accounted for approximately 15% of the total archaeological API. Overall, no prehistoric or historic-era archaeological resources were identified within the archaeological API during the pedestrian survey.

4.5.4 Impact Analysis

4.5.4.1 Project Impacts

Impact 4.5-1 The project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section15064.5. (Potentially Significant)

See Section 4.18, Tribal Cultural Resources, for separate discussion of the potential for presence of these resources, potential impacts, and required mitigation measures.

Program-Level Analysis for the Master Plan

The SCCIC records search did not identify any archaeological resources within the proposed Master Plan area, although two (2) archaeological resources were identified within the 1-mile search radius. These include one prehistoric lithic quarry site (P-19-000883) and one historic-era resource that includes the remnants of a cattle chute, cattle corral, water trough, cattle gate, and dirt access road (P-19-192745). Although the SCCIC records search did not identify any archaeological resources within the Master Plan area, there is evidence to indicate that prehistoric artifacts have been identified in the past during construction activities on the Cal Poly Pomona campus.

An NAHC SLF search was also requested for the Master Plan, and results were positive for Native American cultural resources within 1 mile of the Master Plan area. The USDA's soil types mapped within the Master Plan area and the geotechnical investigations that have taken place on the Cal Poly Pomona campus demonstrate that alluvial soils are present within the Master Plan area, which in general have moderate potential to contain subsurface archaeological deposits. A review of historical aerial photographs and historical topographic maps indicates that the Master Plan area was utilized in the past as agricultural land before it was incorporated into the Cal Poly Pomona campus. Disturbances associated with these activities likely included mass grading, discing, and trenching, and hillside stabilization efforts. A reconnaissance-level pedestrian survey of the archaeological API was conducted on May 31, 2024. Although no archaeological resources were identified within the archaeological API during the survey, the large majority (85%) of the ground surface was obscured by structures, hardscape, and landscaping.

Although the proposed Master Plan will not have any impacts on known archaeological resources, there is a moderate potential for the inadvertent discovery of subsurface archaeological resources if ground disturbance occurs in native soils during Master Plan implementation. If unknown archaeological resources possessing the characteristics outlined in CEQA as significant exist and are inadvertently encountered during implementation (i.e., construction) of the Master Plan, there is potential for a substantial adverse change in the significance of an archaeological resource (pursuant to CEQA Guidelines Section 15064.5) to occur. As such, impacts related to the inadvertent discovery of archaeological resources during construction are **potentially significant**.

MM-CUL-1 (Additional Cultural Resources Inventory Efforts) requires the completion of a cultural resources inventory for proposed Master Plan development ultimately located outside the archaeological API. MM-CUL-2 (Cultural Resources Sensitivity Training) requires the implementation of a cultural resources sensitivity training for construction crews prior to initiation of ground-disturbing activities for the proposed Master Plan. MM-CUL-3 (Cultural Resources Monitoring and Inadvertent Discovery Protocols) requires archaeological monitoring during all ground-disturbing activities in native soils and sets forth requirements for the treatment of inadvertently discovered archaeological resources until a qualified archaeologist can assess and evaluate the discovery pursuant to CEQA. With implementation of MM-CUL 1, MM-CUL-2, and MM-CUL-3 potentially significant impacts to unknown

archaeological resources would be reduced to **less than significant**. (See Section 4.5.5, Mitigation Measures, for the full text of these mitigation measures.)

Project-Level Analysis for Near-Term Projects

Although near-term projects will not have any impacts on known archaeological resources, there is a moderate potential for the inadvertent discovery of subsurface archaeological resources if ground disturbance occurs in native soils during near-term project implementation. If unknown archaeological resources possessing the characteristics outlined in CEQA as significant exist and are inadvertently encountered during implementation (i.e., construction) of the near-term projects, there is potential for a substantial adverse change in the significance of an archaeological resource (pursuant to CEQA Guidelines Section 15064.5) to occur. As such, impacts related to the inadvertent discovery of archaeological resources during construction are **potentially significant**.

With implementation of MM-CUL 1, MM-CUL-2, and MM-CUL-3 potentially significant impacts to unknown archaeological resources would be reduced to **less than significant**. (See Section 4.5.5, Mitigation Measures, for the full text of these mitigation measures).

Impact 4.5-2 The project could disturb any human remains, including those interred outside of dedicated cemeteries. (Potentially Significant)

See Section 4.18, Tribal Cultural Resources, for separate discussion of the potential for presence of these resources, potential impacts, and required mitigation measures.

Program-Level Analysis for the Master Plan

No prehistoric or historic-era burials, including those interred outside of formal cemeteries, were identified within the Master Plan area as a result of the SCCIC records search, NAHC SLF search, archival research, and pedestrian survey. Based on the nature of the construction activities associated with the proposed Master Plan (primarily the renovation of existing buildings and the demolition and replacement of existing buildings in the same general physical location) the likelihood of disturbing human remains is low. However, the possibility of encountering human remains within the Master Plan area exists. In the event that human remains are inadvertently encountered during Master Plan construction activities, impacts to these resources would be **potentially significant**.

The discovery of human remains would require handling in accordance with PRC 5097.98, which states that in the event that human remains are discovered during construction, construction activity shall be halted, and the area shall be protected until consultation and treatment can occur as prescribed by law. Therefore, with adherence to state law and with the implementation of MM-CUL-4 (Treatment of Human Remains), impacts would be **less than significant**. (See Section 4.5.5, Mitigation Measures, for the full text of this mitigation measure.)

Project-Level Analysis for Near-Term Projects

Based on the nature of the construction activities proposed for near-term projects (primarily the renovation of existing buildings and the demolition and replacement of existing buildings in the same general physical locations) the likelihood of disturbing human remains is low. However, the possibility of encountering human remains during near-term project construction exists. In the event that human remains are inadvertently encountered during near-term construction activities, impacts to these resources would be **potentially significant**.

The discovery of human remains would require handling in accordance with PRC 5097.98, which states that in the event that human remains are discovered during construction, construction activity shall be halted, and the area shall be protected until consultation and treatment can occur as prescribed by law. Therefore, with adherence to state law and with the implementation of MM-CUL-4 (Treatment of Human Remains), impacts would be **less than significant**. (See Section 4.5.5, Mitigation Measures, for the full text of this mitigation measure.)

4.5.4.2 Cumulative Impacts

Impact 4.5-3 The project could result in a cumulatively considerable contribution to significant cumulative impacts related to cultural resources. (Less than Significant)

See Section 4.18, Tribal Cultural Resources, for separate discussion of the potential presence of these resources, potential impacts, and required mitigation measures.

CEQA requires cumulative effects be considered for projects that are proposed or pending, recently approved, under construction, or reasonably foreseeable as well as the proposed Master Plan for this EIR. Cumulative effects on cultural resources evaluate whether impacts of the proposed Master Plan and related cumulative projects, when considered together, substantially diminish the number of cultural resources within the same or similar context or property type. As discussed in Chapter 4.0 Environmental Analysis, of this EIR, there are numerous pending or approved related cumulative projects that have the potential to contribute to cumulative impacts to cultural resources.

As discussed above, there are no known significant archaeological resources pursuant to CEQA Guidelines Section 15064.5 present on the proposed Master Plan area. Because all archaeological resources are unique and nonrenewable resources, projects that demolish or alter certain archaeological resources have the potential to erode a general cultural landscape to which the archaeological resources belong. Therefore, implementation of the proposed Master Plan could result in a cumulatively significant effect on archaeological resources when combined with other cumulative development in the area due to the loss of identified or unknown archaeological resources through the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance of a resource would be materially impaired. However, development under the proposed Master Plan is required to implement MM-CUL-1, MM-CUL-2, and MM-CUL-3, which would reduce project-related impacts to a less than significant level within proposed Master Plan area. Because there are no known archaeological resources within the proposed Master Plan area, the mitigation is for inadvertent discoveries. The project-specific mitigation combined with the mandatory evaluation of potential impacts to other nearby cumulative projects would ensure that there would be no cumulatively considerable impacts to significant archaeological resources. Impacts would be **less than significant**.

As discussed above, there are no known human remains, including those interred outside of dedicated cemeteries, present within the proposed Master Plan area. Because human remains are unique and nonrenewable resources, projects that demolish, destroy, alter or move human remains have the potential to erode a general cultural landscape to which the human remains belong. Therefore, cumulative development within the area would have the potential to result in a cumulative impact associated with the loss of yet unidentified human remains through the physical demolition, destruction, relocation, or alteration of a remains or their immediate surroundings. However, human remains are generally site-specific and the proposed Master Plan's potential impacts to disturbance human remains would be reduced to less than significant with implementation of project-specific MM-CUL-4. All cumulative projects would similarly be required to comply with State Health and Safety Code Section 7050.5, PRC Sections 5097.94 and 5097.98, and all other applicable laws. Based on the degree of protection afforded by MM-CUL-4 for

potential project-specific impacts to human remains, the proposed Master Plan would not contribute to cumulatively considerable impacts related to disturb any human remains, including those interred outside of dedicated cemeteries. Impacts would be **less than significant**.

4.5.5 Mitigation Measures

The following mitigation measures would reduce potentially significant impacts to archaeological resources. See also Section 4.18, Tribal Cultural Resources, for required mitigation measures for impacts to Tribal Cultural Resources.

MM-CUL-1 Additional Cultural Resources Inventory Efforts. Prior to the initiation of ground-disturbing activities for proposed Master Plan projects located outside the archaeological area of potential impacts (API) as presently mapped (Figure 4.5-1), performance standards for identifying and assessing the impacts of the subject project(s) on cultural resources must be met. This shall initiate with a cultural resources inventory, overseen by a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology (principal investigator). The cultural resources inventory shall, at a minimum, include the results of the following:

1. If existing data is more than 5 years old, a California Historical Resources Information System (CHRIS) records search at the South Central Coastal Information Center (SCCIC)
2. A Sacred Lands File search with the Native American Heritage Commission (NAHC) and engagement with Consulting Tribes (as identified through government-to-government consultation conducted in support of the present EIR)
3. A pedestrian survey meeting best practice standards of areas not previously subject to intensive-level survey in the last 10 years
4. Preparation of a cultural resources inventory report, even if no resources are identified. All reports should be maintained on-file with Cal Poly Pomona and submitted to the SCCIC

If any cultural resources (archaeological or built environment elements more than 45 years in age) are identified during the cultural resources inventory studies, the potential for avoidance should be the primary consideration. An appropriate buffer for avoidance is typically 100 feet, which may be adjusted at the recommendation of the principal investigator, so that the exclusion buffer allows key activities to proceed while ensuring that no ongoing project activities will affect the find. If it is determined that avoidance is unfeasible, a significance evaluation shall be completed in order to determine the significance of the resource as outlined by the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; California Public Resources Code Section 21082). No project activities shall be permitted in the vicinity of the resource until the significance of the resource is assessed by the principal investigator with concurrence by Cal Poly Pomona. If the resource is of Native American origin, Consulting Tribes shall be given the opportunity to provide input on evaluation strategies prior to implementation and findings. Where approved, archaeological resources with potential to support buried archaeological deposits shall be evaluated by the principal investigator through an archaeological testing phase that consists of systematic excavations of a sample of areas within the proposed project area to determine the integrity of the archaeological deposits, the horizontal and vertical extent of the deposits, the quantity and diversity of artifacts contained within the deposits, and the potential for human remains. The goal is to avoid or minimize impacts to archaeological resources based on the results of the test excavations. Pursuant to

Section 15126.4(b)(3)(A), preservation in place is the preferred manner of mitigating impacts to archaeological resources. However, Section 15126.4(b)(3)(C) also recognizes that data recovery through excavation may be the only feasible mitigation for significant or unique cultural resources at times; therefore, this contingency should be provided for. Any data recovery shall meet best practice standards and shall be supported by a data recovery plan, prepared by the principal investigator, that has been approved by Cal Poly Pomona. Consulting Tribes shall be provided the opportunity to comment on any data recovery plan concerning resources of Native American origin or association. All studies shall be submitted to Cal Poly Pomona for review and approval.

Please note that Tribal Cultural Resources (as defined by PRC Section 21074(a)) represent an independent, albeit often related, resource type under CEQA. Impacts to Tribal Cultural Resources are assessed through the process of government-to-government consultation. Should a possible Tribal Cultural Resource be identified, management strategies to address this find shall occur in compliance approved Tribal Cultural Resources mitigation.

Feasible measures and management strategies shall also be identified based on the results of the cultural resources studies and as informed by tribal consultation. Assuming no significant or unique cultural resources are identified, MM-CUL-2, MM-CUL-3, and MM-CUL-4 shall be implemented throughout the duration of the subject project.

MM-CUL-2 Cultural Resources Sensitivity Training. Cal Poly Pomona shall include a standard clause in every ground-disturbing construction contract for the project that requires cultural resources sensitivity training that may occur as part of a worker environmental awareness program. Prior to the initiation of ground-disturbing activities, construction crews shall be made aware of the potential to encounter cultural resources and the requirement for cultural monitors to be present during these activities. Topics addressed should include definitions and characteristics of cultural resources and Tribal Cultural Resources, regulatory requirements and penalties for intentionally disturbing cultural resources, and protocols to be taken in the event of an inadvertent discovery.

MM-CUL-3 Archaeological Monitoring and Inadvertent Discovery Protocols. An archaeological monitor shall be present during all ground-disturbing activities especially those in native soils for the project. Archaeological monitoring may be adjusted (increased, decreased, or discontinued) at the recommendation of an archaeological principal investigator (meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology) and based on inspection of exposed cultural material and the observed potential for soils to contain intact cultural deposits or otherwise significant archaeological material. The archaeological monitor shall have the authority to temporarily halt work to inspect areas for potential cultural material or deposits.

In the event that unanticipated archaeological deposits or features are exposed during construction activities, all construction work occurring within 100 feet of the find shall immediately stop until the archaeological principal investigator is provided access to the project area and can assess the significance of the find and determine whether additional study is warranted. The work exclusion buffer may be adjusted as appropriate to allow work to feasibly continue at the recommendation of the archaeological principal investigator. Should it be required, temporary flagging shall be installed around the resource to avoid any disturbance from construction equipment. The potential for avoidance should be the primary consideration of this initial process. The significance of the find shall be assessed as outlined by the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; California Public Resources Code Section 21082). If the archaeological principal

investigator observes the discovery to be potentially significant under CEQA, additional efforts, such as the preparation of an archaeological treatment plan, testing, and/or data recovery, are warranted prior to allowing construction to proceed in this area.

Daily monitoring logs shall be completed by the on-site archaeological monitor. Within 60 days following completion of construction, the archaeological principal investigator shall provide an archaeological monitoring report to Cal Poly Pomona. This report shall include the results of the cultural monitoring program (even if negative), including a summary of any findings or evaluation/data recovery efforts, and supporting documentation that demonstrates that all mitigation measures defined in the environmental document were appropriately met. Appendices shall include archaeological monitoring logs and documentation relating to any newly identified or updated cultural resources. This report shall be submitted to the SCCIC once considered final.

MM-CUL-4 Inadvertent Discovery Protocols for Human Remains. In accordance with Section 7050.5 of the California Health and Safety Code and the requirements of the California Code of Regulations (CCR) Section 15064.5(e), if human remains are found, the Los Angeles County Coroner (County Coroner) shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, The County Coroner shall notify the NAHC in within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify the person or persons it believes to be the Most Likely Descendant (MLD) of the deceased Native American. The MLD shall complete inspection after being granted access to the site and make recommendations for the treatment and disposition, in consultation with Cal Poly Pomona, of the human remains and associated grave goods.

4.5.6 Level of Significance After Mitigation

Implementation of MM-CUL-1 through MM-CUL-4 would reduce all potentially significant impacts of the proposed Master Plan, including near-term projects, related to archaeological resources to **less than significant**.

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4.6 Cultural Resources – Historical Resources

The following analysis identifies potential impacts to historical resources resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing conditions of historical resources on the main campus within the proposed Master Plan area, discusses the regulatory setting, evaluates potential impacts to historical resources, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts. This section is based on a Historical Resources Technical Report (HRTR) prepared by Dudek in February 2025 for the proposed Master Plan (Appendix D-2). The HRTR documents the identification and evaluation of historical resources within the identified Area of Potential Impacts (API) of the proposed Master Plan area that addresses the main campus.

No comments related to historical resources were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are provided in Appendix A.

4.6.1 Environmental Setting

4.6.1.1 Historic Context

In accordance with best practices and National Park Service guidance, properties must be evaluated within their historic context to ensure a thorough application of the eligibility criteria in the determination of potential significance. Theme, place, and time are the basic elements that define a historic context. The historic context statement included in evaluations typically includes and describes eras of physical development, including the evolution of building forms and architectural styles, as well as highlighting facets of patterns of development or events. In order to provide a contextual framework for assessments, the historic context statement provides an overview of the historic themes and the architectural styles that were documented as part of the Master Plan HRTR and that are most relevant for Cal Poly Pomona. A historic context statement was developed by Dudek as part of proposed Master Plan HRTR, which is summarized below. See Appendix D-2 for additional information.

Historical Overview of the California State University System

The Normal School system began in eighteenth century Europe as a training school for teachers to establish a standard approach to elementary school curriculum in public institutions. The first Normal School was established in the United States in Lexington, Massachusetts, in 1839. Nearly 20 years later in 1857, the San Francisco Board of Education established Minns Evening Normal School in San Francisco.

Following a vote by the state legislature, Minns Evening Normal School became the California State Normal School in 1862. In 1871, the state legislature voted to relocate the campus from San Francisco to San Jose, where it opened in time for the 1872 term. Subsequent State Normal School campuses were established in other cities throughout the state during the remainder of the nineteenth century. Following the turn of the twentieth century, the California State Normal School system established several campuses that offered new educational opportunities. In 1921, the state legislature voted to change all "Normal Schools" in the state system to "teachers colleges". The name change marked the program's evolution towards a collegiate-level system of schools. In 1935, the legislature voted to rename "teachers colleges" to "state colleges".

Prompted by massive post-World War II population growth in California, numerous new campuses were in place by 1961 when the Donahoe Higher Education Act of 1960 formally established the California State College system.

To construct the facilities necessary to serve the students on the new and expanding California State Colleges campuses, in some cases, the State of California Public Works, Division of Architecture, modified standardized designs to fit the needs of individual campuses to save money and expedite construction schedules.

In 1972, the California State College system became the California State University and Colleges system. In 1982, the California State University and Colleges system schools became the CSU system. Today, the CSU system is one of the extensive public education systems in the United States and presently includes 22 participating campuses throughout the state, which serve nearly 500,000 students every year.

Historical Overview of Polytechnic Schools in California

This section provides an overview of the advent of polytechnic schools in California. Emerging during the Progressive Era, this alternative educational approach prioritized practical, hands-on learning in vocational training and education. In California, the earliest polytechnic school was founded in 1901 in San Luis Obispo, on the Central Coast, with the second campus established in Pomona on the site of current-day Cal Poly Pomona in 1938.

In 1901, the years of advocacy and organizing spearheaded by Angel resulted in a bill that created the California Polytechnic School. The bill stated the school would provide a school to educate "young people of both sexes [in] mental and manual training in the arts and sciences, including agriculture, mechanics, engineering, business methods, domestic economy and other branches as will fit the students for non-professional walks of life".

During the Great Depression, the second polytechnic school was established in Southern California, when Pomona's Voorhis School was acquired in 1938 for use as a horticultural training center; the center became the Southern California branch of Cal Poly, called the Voorhis Unit, and later evolved into Cal Poly Pomona.

Following the Pomona campus' establishment, Cal Poly San Luis Obispo and Pomona became two of only three campuses in California offering bachelor's degrees in agriculture (the third was Fresno State College). The Pomona campus was endowed with 500 acres devoted to pasture, field crops, ornamental horticulture, orchards, vegetable crops, 1,000 cows, slaughtering and processing plants, and a packing house. In addition, the Pomona campus inherited the W.K. Kellogg Arabian horse breeding program (which continues to operate on campus), one of the largest and oldest Arabian programs in the United States and the only such program at a higher education institute in California.

Both the San Luis Obispo and the Pomona campus of Cal Poly experienced substantial student enrollment growth and corresponding course and campus expansion through the 1950s and into the 1960s. In 1972, the San Luis Obispo and Pomona campuses both became universities, and their names were changed to California Polytechnic State University. Today, while Cal Poly San Luis Obispo and Pomona both still emphasize a polytechnic education, they also have robust liberal arts programs and offer a wide variety of majors.

Historical Overview of Cal Poly Pomona (1925-1979)

This section provides a chronological history of the growth of the Cal Poly Pomona campus as demonstrated by the following campus development periods.

- Institutional Establishment and Early Years in San Dimas (1928–1949)
  - ***Voorhis School for Boys (1928–1938):*** During its early years, the institution that would become Cal Poly Pomona was known the Voorhis Unit of Cal Poly San Luis Obispo. The Voorhis Unit was located at

the former campus of the Voorhis School for Boys in San Dimas, which is approximately 8 miles northwest of Pomona. The residential school, which included a component of religious training, was established to provide hands-on vocational and agricultural education to "boys in need of a better environment." Believing that Cal Poly's emphasis on vocational training aligned with the educational ethos of the Voorhis School, Voorhis donated the nearly 160-acre campus to the state in 1938.

- ***The Voorhis Unit (1938–1949):*** The transition from the Voorhis School to the Voorhis Unit of Cal Poly was rapid; the first class of students attending the Voorhis Unit arrived in September 1938. In 1940, the state granted Cal Poly approval as a 4-year college with the ability to grant bachelor's degrees. During these early years, administrators emphasized that Cal Poly was one college with two units (San Luis Obispo and Voorhis) and these campuses were not separate institutions. The Voorhis Unit campus in San Dimas was used until 1956, when most educational operations were moved to the Kellogg campus, Cal Poly Pomona's present-day home. As the Voorhis Unit was a different campus than the current Cal Poly Pomona campus, there are no extant built environment properties associated with this period on campus.

- The W.K. Kellogg Years, 1925–1949)
  - ***W.K. Kellogg Arabian Horse Ranch (1925–1931):*** The present campus of Cal Poly Pomona was originally the W.K. Kellogg Arabian Horse Ranch, owned by cereal magnate Will Keith (W.K.) Kellogg of Battle Creek, Michigan. The property was purchased by W.K. Kellogg in 1925. Through the establishment of the ranch, Kellogg funded the development of an Arabian horse breeding program, the oldest Arabian horse breeding program in the United States and the fifth largest in the country. Since purchasing the property in 1925, Kellogg intended to ensure the perpetuation of the ranch and the Arabian breeding program after his death, having contacted the University of California as early as 1926 about eventually stewarding the program. There are 15 extant buildings and landscape features from this period on the Cal Poly campus.
  - ***W.K. Kellogg Institute for Animal Husbandry (1932–1943):*** The Kellogg Ranch was transferred to the State of California for use as the University of California's W.K. Kellogg Institute for Animal Husbandry in 1932. The initially cordial relationship between W.K. Kellogg and the University of California, however, became increasingly strained. Kellogg visited in May 1936 and was dissatisfied with the property's upkeep, observing weeds, peeling paint, broken fences, and morale problems among ranch employees. The Japanese attack on Pearl Harbor on December 7, 1941, prompted the United States' entry into World War II and caused Kellogg to intensify his efforts to transfer the ranch to the Army Remount Service. 1n 1943, the Regents accepted a proposal to give the ranch to the Army, and by August 1943, most of the details had been agreed upon. There is one extant building from this period on the Cal Poly campus.
  - ***Pomona Quartermaster Depot (Remount) (1943–1947):*** On October 1943, the Army took ownership of the ranch, and it became the Pomona Quartermaster Depot (Remount). The headquarters of the Western Remount Area, as well as the War Dog Reception and Training Center, were moved from San Mateo and San Carlos respectively to the Kellogg Ranch in Pomona. The Army primarily completed maintenance work and remodeled existing buildings rather than construct new facilities. The ranch saw minimal new development during the Army's period of ownership. According to available records, there are no extant buildings from this period on the Cal Poly campus.
  - ***U.S. Department of Agriculture (1948–1949):*** The ranch was transferred from the Army to the Bureau of Animal Industry, U.S. Department of Agriculture (USDA) in July 1948. However, USDA stewardship of the ranch was short-lived as the cost to maintain the ranch and Arabian program proved unsustainable. Soon after acquiring the property, USDA announced they would relinquish ownership of the ranch in

January 1949 and sell the land. After considerable political pressure, the California State Board of Education approved a resolution for the legislature in June 1949 to make the ranch a part of the San Dimas branch of California Polytechnic College. According to available records, there are no extant buildings constructed in this period on Cal Poly's campus.

- California Polytechnic University, Pomona (1949–1979)
  - ***Campus Establishment (1949–1955):*** Cal Poly officially took over the Kellogg Ranch in November 1949, and by December had installed signage reading "California State Polytechnic College, Kellogg Unit." In 1954, the initial campus master plan was prepared to accommodate anticipated enrollment up to 3,600 students and called for the construction of 22 buildings, which included educational buildings as well as service buildings such as a library, a student union, dormitories, a health center, and an administration building. The campus building program began in 1955. According to available records, there are no extant buildings constructed in this period on Cal Poly's campus.
  - ***Initial Period of Campus Development (1956–1967):*** Cal Poly's campus developed substantially between 1956, when the first campus building was completed, and 1967, when Cal Poly's revised master plan for physical development was approved by the Board of Trustees. Cal Poly became its own campus independent from Cal Poly in San Luis Obispo in 1966 and was called California Polytechnic College, Kellogg. The move from the Voorhis Unit in San Dimas to the Kellogg campus occurred in the summer of 1956. Although most academic courses were taught at the Kellogg campus, some courses remained at Voorhis, and students continued to live at the Voorhis campus. Students first occupied residence halls in the fall of 1960. This period also saw the addition of agricultural land to the campus, located to the south of the existing ranch, adjacent to the Lanterman State Hospital. The most significant event to shape Cal Poly in the 1960s was the separation of Cal Poly San Luis Obispo from the Kellogg campus in Pomona to form two independent state colleges in October 1966. The 1964 master plan identified physical development to support a projected enrollment of 10,000 students by 1980, and a 1967 master plan revision identified physical development to support a projected enrollment of 20,000 students by 1996. There are 38 extant buildings, landscape features, and sports fields from this period on the Cal Poly campus
- ***Campus Maturation (1968–1979):*** Following the approval of Cal Poly's master plan in 1967, campus development occurred rapidly; however, statewide factors and budgetary concerns slowed growth by the mid-1970s. Construction in the 1970s consisted primarily of infill around the central academic quad, as well as in previously undeveloped parts of the campus, such as the location of Kellogg West and the W.K. Kellogg Arabian Horse Center. A new master plan for the next decade of development, called Project '88, was released in 1978 and outlined academic and physical development goals for the campus. While there was some planning for the physical development of the campus, it was relatively limited. There are 29 extant buildings and landscape features from this period on the Cal Poly campus.

Table 4.6-1 provides an overview of the dates of construction of buildings on the Cal Poly Pomona campus by period of construction. The period "Institutional Establishment and Early Years in San Dimas, 1928–1949" is not included in Table 4.6-1 below as this period discusses the establishment of Cal Poly's Voorhis Unit at a geographically distinct campus in San Dimas.

Table 4.6-1. Overview of Dates of Construction by Development Period

Development Period	Number of Buildings and Landscape Features	Percentage Constructed with the Specified Period
The W.K. Kellogg Years (1925–1949)		
W.K. Kellogg Arabian Horse Ranch (1925–1931)	15	19
W.K. Kellogg Institute for Animal Husbandry (1932–1943)	1	1
Pomona Quartermaster Depot (Remount) (1943–1947)	0	0
U.S. Department of Agriculture (1948–1949)	0	0
Total (1925–1949)	*16*	*20*
California Polytechnic University, Pomona (1949–1979)		
Campus Establishment (1949–1955)	0	0
Initial Period of Campus Development (1956–1967)	38	45
Campus Maturation (1968–1979)	29	35
Total (1949–1979)	*67*	*80*
		Total (1925–1979): 83

4.6.2 Regulatory Setting

The following sections provide an overview of the federal and state regulatory framework in which historic properties and historical resources are identified and evaluated.

4.6.2.1 Federal

National Historic Preservation Act (54 USC Section 300101 et seq., including Section 106 of the NHPA, 54 USC Section 306108)

The National Historic Preservation Act (NHPA) established the National Register of Historic Places (NRHP) and the Advisory Council on Historic Preservation (ACHP). Under the NHPA, significant cultural resources are referred to as historic properties, which include any prehistoric or historic district, site, building, structure, or object included in, or determined eligible for inclusion in, the NRHP. Historic properties that are designated by the Secretary of the Interior to be National Historic Landmarks are nationally significant historic places that possess exceptional value or quality in illustrating or interpreting the heritage of the United States. A property is considered historically significant if it meets one of the NRHP criteria and retains sufficient historic integrity to convey its significance.

Implementing Regulations for Section 106 of the NHPA (36 CFR Part 800)

Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. The Section 106 process consists of four principal steps: 1) initiation of the Section 106 process, which includes identifying and initiating consultation with Native American tribes, local governments, and other interested parties; 2) identification of historic properties; 3) assessment of adverse effects; and 4) delineation of stipulations to resolve adverse effects in an agreement document.

Section 106 affords the ACHP and the State Historic Preservation Officer (SHPO), as well as other consulting parties, a reasonable opportunity to comment on any project that would adversely affect historic properties. The ACHP is an independent administering agency that develops procedures at the federal level to protect cultural resources included in, or eligible for inclusion in, the NRHP. The SHPOs administer the national historic preservation program at the state level, in addition to reviewing NRHP nominations, maintaining data on historic properties, and consulting with federal agencies during the Section 106 review.

The NRHP criteria for evaluation (36 CFR Section 60.4) considers the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that:

A. Are associated with events that have made a significant contribution to the broad patterns of our history; or
B. Are associated with the lives of persons significant in our past; or
C. Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
D. Have yielded or may be likely to yield, information important in prehistory or history.

To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity. Integrity is the ability of a property to convey its significance. Because the concept of integrity is based on significance, the assessment of a property's integrity can only proceed after its significance has been fully established. In addition to meeting at least one of the significance criteria discussed above, the assessment of integrity requires consideration under the following seven aspects or qualities: location, design, materials, workmanship, setting, feeling, and association. To retain integrity, a property will always possess several, and generally most, of these aspects (NPS 1995:44).

Certain properties are not typically considered for listing in the NRHP: religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties achieving significance within the past 50 years. These properties may be eligible for listing in the NRHP if the property meets one of the four criteria listed above and if the property also meets the appropriate Criteria Consideration for the property.

4.6.2.2 State

California Environmental Quality Act (PRC Section 21083.2) and CEQA Guidelines (14 CCR Section 15064.5)

CEQA requires that the lead agency consider the impacts of a project on historical resources. PRC Section 21084.1 defines historical resources as those listed, or eligible for listing, in the CRHR, or those officially designated or recognized as historically significant by a local government pursuant to a local county or city ordinance or jurisdiction, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. Historical resources also include "historic properties" in California that are listed, or determined eligible for listing, in the NRHP and CRHR. The CEQA Guidelines provide specific guidance for determining the significance of impacts on historical resources. As described in in Section 15064.5(b) of the CEQA Guidelines, a "project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment."

- A "substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (Section 15064.5[b][1]).
- The significance of a historical resource is materially impaired when a project:
  - Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources (Section 15064.5[b][2][A]); or
  - Demolishes or materially alters in an adverse manner those physical characteristics that account for it inclusion in a local register of historical resources pursuant to Section 5020.1[k] of the Public Resources Code or its identification in a historical resources survey meeting the requirements of Section 5024.1[g] of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of the evidence that the resource is not historically or culturally significant (Section 15064.5[b][2][B]); or
  - Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA (Section 15064.5[b][2][B]); or

The CEQA Guidelines also provide guidance on minimizing or avoiding significant adverse impacts on historical resources as outlined in the following provisions of Section 15064.5(b)(3)-(5).

- Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource (Section 15064.5[b][3]).
- A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of a historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures (Section 15064.5[b][4]).
- When a project will affect state-owned historical resources, as described in Public Resources Code Section 5024, and the lead agency is a state agency, the lead agency shall consult with the State Historic Preservation Officer as provided in Public Resources Code Section 5024.5. Consultation should be coordinated in a timely fashion with the preparation of the environmental documents (Section 15064.5[b][5]).

California Register of Historical Resources (PRC Section 5024.1 and 14 CCR Section 4850)

PRC Section 5024.1 establishes the CRHR, which lists all significant resources in California that are considered to be historical resources. In California, the term "historical resource" includes, but is not limited to, "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California Public Resources Code Section 5020.1[j]). In 1992, the California legislature established the CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (California Public Resources Code Section 5024.1[a]). The criteria for

listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP. As such, a resource is considered historically significant if it meets at least one of the following criteria outlined under PRC Section 5024.1(c):

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one of the significance criteria described in PRC Section 5024.1(c), a resource must also possess sufficient integrity to qualify for listing in the CRHR. Integrity as defined in 14 California Code of Regulations (CCR) Section 4852(c) as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance" as evaluated with regard to the resource's retention of location, design, setting, materials, workmanship, feeling, and association. Historical resources that lack sufficient integrity to meet the criteria for listing in the NRHP may still be eligible for listing in the CRHR if they have the potential to yield significant scientific, historical information, specific data. The CRHR's special considerations for certain property types are limited to moved buildings, structures or objects; historical resources achieving significance within the past 50 years; and reconstructed buildings. The CRHR includes not only listed prehistoric and historic cultural resources but also resources that are identified through local historical resource surveys or designated under local ordinances provided the survey and ordinance meet the criteria in 14 CCR Section 4852(e) and (f).

California Public Resources Code Sections 5024 and 5024.5

PRC Sections 5024 and 5024.5 establish provisions that require state agencies to preserve and document state-owned historical resources under the agency's jurisdiction. State programs and projects are reviewed pursuant to PRC Sections 5024 and 5024.5 and require consultation with the SHPO. Under these sections, "state agency" is defined as any agency, department, division, commission, board, bureau, officer, or other authority of the State of California. These sections of the PRC are summarized below.

PRC Section 5024 states that on or before January 1, 1982, each state agency shall formulate policies to preserve and maintain, when prudent and feasible, all state-owned historical resources under its jurisdiction listed in or potentially eligible for inclusion in the NRHP or registered or eligible for registration as a California Historical Landmark (CHL). The State Historic Preservation Officer (SHPO) provides such agencies with advice and assistance as needed. On or before July 1, 1983, each state agency shall submit to the SHPO an inventory of all state-owned structures over 50 years of age under its jurisdiction that are listed, or may be eligible for listing, in the NRHP or that are registered or may be eligible for registration as a CHL. The SHPO, with the advice of the State Historical Resources Commission, shall establish standards for the submittal of inventories and the development of policies for the review of identified historical resources. These review procedures allow the SHPO to determine which historical resources meet NRHP and CHL criteria and warrant inclusion in the master list of historical resources. The master list comprises all inventoried resources submitted and determined significant pursuant to this section and all state-owned historical resources currently listed in the NRHP or registered as a CHL under state agency jurisdiction. The list is maintained by the SHPO and informs agencies with historical resources included in the master list of funding sources for preservation activities, including rehabilitation and restoration. On or before

July 1, 1984, and annually thereafter, each state agency shall submit inventory updates to the SHPO and a statement of its year's preservation activities. Each state agency shall submit to the SHPO for comment documentation for any project having the potential to affect historical resources listed in or potentially eligible for inclusion in the NRHP or registered as or eligible for registration as a CHL.

PRC Section 5024.5 directs that no state agency shall alter the original or significant historical features or fabric, or transfer, relocate, or demolish historical resources on the master list without, early in the planning processes, first giving notice and a summary of the proposed action to the SHPO who shall have 30 days after receipt of the notice and summary for review and comment. If SHPO determines that a proposed action will have an adverse effect on a listed historical resource, the head of the state agency having jurisdiction over the historical resource and the SHPO shall adopt prudent and feasible measures that will eliminate or mitigate the adverse effects. The SHPO shall consult the State Historical Building Safety Board for advice when appropriate. Each state agency shall maintain written documentation of the SHPO's concurrence with proposed actions which would have an effect on a historical resource on the master list. The SHPO shall report to the Office of Planning and Research for mediation instances of a state agency's refusal to propose, to consider, or to adopt prudent and feasible alternatives to eliminate or mitigate adverse effects on historical resources on the master list. The SHPO may monitor the implementation of proposed actions of any state agency. Until such time as a resource is evaluated for possible inclusion in the inventory state agencies shall assure that any such resource which might qualify for listing is not inadvertently transferred or unnecessarily altered. The SHPO may also provide local governments with information on methods to preserve their historical resources.

California Historical Landmarks

California Historical Landmarks (CHL) are sites, buildings, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. To be eligible for designation as a CHL, a resource must meet at least one of the following criteria:

- The first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California).
- Associated with an individual or group having a profound influence on the history of California.
- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer or master builder.

4.6.2.3 Local

For assessments of significance, local criteria are not included in this study, given that the California State University is a state agency.[1] In terms of preservation planning resources at the local level, however, this study included a review of the City of Pomona Historic Context Statement, which was prepared by Historic Resources Group in September 2022 (HRG 2022). The historic context statement created a consistent, thematic framework for evaluating properties in Pomona, including institutional and educational properties such as Cal Poly Pomona. Behind the framework for each context and theme is a set of eligibility standards, along with typical character-defining features and thresholds for the retention of historic integrity.

The following summarizes the contexts and themes that were found to be most relevant for Cal Poly Pomona and that were considered in the survey of Cal Poly Pomona (HRG 2022):

- **Context: Expansion, Growth, and Depression (1920–1940)**

  Theme: Residential Development

  Period of Significance: 1920–1940

  Property Type Description: Significant property types are those representing important periods of residential development in Pomona, including single-family residences, multifamily residences, tract features, and amenities, including street trees/other significant landscape features and streetlights.

  #### NRHP/CRHR Criteria A/1 (Events/Patterns of Development)

  Individual residential properties that are eligible under this criterion may be significant (1) as the site of an event important in history; or (2) for exemplifying an important trend or pattern of residential development.

  Residences that are eligible for an association with a trend or pattern of development from this period may be more appropriately evaluated as part of a historic district. A collection of residential properties that are eligible under this criterion as a historic district may be significant.

  #### NRHP/CRHR Criteria B/2 (Important Persons)

  Individual residential properties eligible under this criterion may be significant (1) for an association with persons significant in our past; or (2) for a proven association with a specific significant ethnic or cultural group that made a demonstrable impact on the community.

  Note that according to National Park Service guidance, "persons significant in our past" refers to individuals whose activities are demonstrably important within a local, state, or national historic context. A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member

[1] Under the California Constitution, the California State University (CSU) is a "state agency created by the Legislature in the field of public higher education which is charged with the management, administration, and control of the State College System of California" (Cal. Const., art. XX, § 23). The California State University system, therefore, is the State of California acting in its higher education capacity. In creating the CSU, the California State Legislature expressly granted it a variety of powers, including the "full power and responsibility in the construction and development of any state university campus, and any buildings or other facilities or improvements connected with the California State University." (Cal. Ed. Code § 66606.) As a result, Government Code sections 53090 and 53091, which require that local agencies comply with zoning and building ordinances, do not apply to the CSU. Accordingly, as a component of the CSU, Cal Poly Pomona is not subject to municipal regulation of uses on property owned or controlled by CSU, in furtherance of the University's education purposes. Cal Poly Pomona may consider, for information purposes only, aspects of local plans and policies for the communities surrounding the proposed Master Plan area, but it is not bound by those plans and policies in its planning efforts.

of an identifiable profession, class, or social or ethnic group. In addition, the property must be associated with a person's productive life, reflecting the time period when he or she achieved significance.

NRHP/CRHR Criteria C/3 (Architecture and Design)

Individual residential properties that are eligible under this criterion may be significant as (1) an excellent example of an architectural style, property type, or method of construction; or (2) a distinctive work by a noted architect, landscape architect, builder, or designer.

- **Context: Expansion, Growth, and Depression (1920–1940)**

  Theme: Civic and Institutional Development

  Period of Significance 1920–1940

  Associated Property Types: Institutional (Post Office, Fire and Police Station, School, Library, Hospital, Religious Building, Social Club, Cultural Institution, Fraternal Organization, Park, Civic Building, Civic Amenity, Public Art).

  Property Type Description: Institutional property types include schools, hospitals, religious buildings (including churches, convents, rectories, and schools), clubhouses associated with social clubs or fraternal organizations, parks, civic buildings like post offices and police/fire stations, and civic amenities.

NRHP/CRHR Criteria A/1 (Events/Patterns of Development)

Individual civic/institutional properties that are eligible under this criterion may be significant (1) as the site of an event important in history; (2) for exemplifying an important trend or pattern of civic or institutional development during this period of expansion and growth; (3) for an important association with New Deal era programs; or (4) as an excellent and rare example of an institutional building type from the period (e.g., library, church, school, fire or police station, hospital, civic/government building).

NRHP/CRHR Criteria C/3 (Architecture and Design)

Individual civic/institutional properties that are eligible under this criterion may be significant as (1) a good/excellent or rare example of an architectural style, property type, or method of construction; or (2) distinctive work by a noted architect, landscape architect, builder, or designer.

- **Context: Postwar Growth, Diversification, and Redevelopment (1946–1980)**

  Theme: Civic and Institutional Development

  Period of Significance 1946–1980

  Associated Property Types: Institutional (Post Office, Fire and Police Station, School, Library, Hospital, Religious Building, Social Club, Cultural Institution, Fraternal Organization, Park, Civic Building, Infrastructure Improvement, Civic Amenity, Public Art).

  Property Type Description: Institutional property types include schools, hospitals, religious buildings (including churches, convents, rectories, and schools), clubhouses associated with social clubs or fraternal organizations, parks, civic buildings like post offices and police/fire stations, and civic amenities.

NRHP/CRHR Criteria A/1 (Events/Patterns of Development)

Individual civic/institutional properties that are eligible under this criterion may be significant (1) as the site of an event important in history, such as an important community gathering place; (2) for exemplifying an important trend or pattern in civic/institutional development, such as expansion of services in proximity to new residential neighborhoods, or postwar school planning principals, or civil rights–related movements; or (3) as an excellent and rare example of a civic or institutional building type from the period (postwar school plants).

NRHP/CRHR Criteria C/3 (Architecture and Design)

Individual civic/institutional properties that are eligible under this criterion may be significant as (1) an excellent or rare example of an architectural style, property type, or method of construction; or (2) a distinctive work by a noted architect, landscape architect, builder, or designer.

4.6.3 Thresholds of Significance and Methodology

4.6.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section15064.7). The significance criteria used to evaluate the proposed Master Plan's impacts to cultural resources are based on CEQA Guidelines Appendix G. A potentially significant impact to cultural resources would occur if the proposed Master Plan would:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to Section15064.5

4.6.3.2 Methodology

Literature Review and Background Research

California Historical Resources Information System Records Search

On May 8, 2024, Dudek archaeologist Makayla Murillo conducted a search of the CHRIS at the South Central Coastal Information Center, located on the campus of the CSU, Fullerton. The search provided information on all documented cultural resources and previous investigations within the proposed Master Plan area and a 1-mile radius of this area. For the full results of the records search including archaeological resource studies, see the Cultural Resources Inventory Report for the proposed Master Plan (Appendix D-1).

Previously Conducted Cultural Resource Studies. Results of the cultural resources records search indicate that 53 previous cultural resource studies have been conducted within 1 mile of the Area of Potential Impact (API) between 1974 and 2012. Of these, 8 studies intersect the API. Table 4.6-2 below, includes the 3 cultural resource studies that appear to include built environment resources followed by summaries of those reports.

Table 4.6-2. Previous Cultural Resources Studies Within the Area of Potential Impacts

IC Report ID	Author	Year	Report Title
LA-03306	Whitney-Desautels, Nancy A. and Wayne H. Bonner	1993	Historic Property Survey Report Interstate 10 HOV Widening Los Angeles County, California Caltrans District 7
LA-10190	Harbert, Claudia	2002	Supplemental Historic Property Survey Report for the I-10 HOV Lane Between I-605 and the SR-57/SR-71/I-210 Interchange in the Cities of Los Angeles, Baldwin Park, West Covina, Covina, San Dimas, and Pomona in Los Angeles County, California
LA-11119	Vaughan-Acton, Sandra	2010	Construction of Innovation Way, Innovation Village Research Park, Pomona, California

- LA-03306. Historic Property Survey Report Interstate 10 HOV Widening Los Angeles County, California Caltrans District 7 documents the results of both an archaeological and built environment investigation in support the proposed widening of I-10. The area of study overlaps with approximately 10% of the currently proposed Master Plan area to the north. The study consisted of a records search, archival research, and a pedestrian survey. No archaeological resources were identified as a result of this study. One built environment resource, called the W K Kellogg Arabian Horse Ranch, was identified. Although called the W K Kellogg Arabian Horse Ranch, this documentation does not evaluate all resources associated with the Kellogg Ranch on Cal Poly's campus; it only includes a residential complex consisting of a Spanish Colonial Revival (SCR) style residence constructed in 1926, a two-story SCR guest house completed in 1928, a garage, a decorative fountain, the remnants of the original entry gate posts, and a rock-lined driveway were identified within the proposed Master Plan area as potentially eligible for the NRHP. The associated resources are addressed in the HRTR (Appendix D-2) as the Kellogg House Pomona (Building 112) and the Kellogg Guest House (Building 113).
- LA-10190. Supplemental Historic Property Survey Report for the I-10 HOV Lane Between I-605 and the SR-57/SR-71/I-210 Interchange in the Cities of Los Angeles, Baldwin Park, West Covina, Covina, San Dimas, and Pomona in Los Angeles County, California documents the results of both an archaeological and built environment investigation in support of the proposed widening of I-10. This study was a supplemental report based off the Whitney-Desautels and Bonner, 1993, report (Report LA-03306). The area of study overlaps with approximately 10% of the currently proposed Master Plan area to the north. The study consisted of a records search, archival research, a pedestrian survey, and the 1995 SHPO concurrence letter for the Whitney-Desautels and Bonner, 1993, report (LA-03306), on the eligibility of the W K Kellogg Arabian Horse Ranch (2S2, 03/13/1995, FHWA950113A). No additional cultural resources were identified as a result of this study.
- LA-11119. Construction of Innovation Way, Innovation Village Research Park, Pomona, California documents letters between the California Office of Historic Preservation (OHP) and the Cal Poly Pomona Foundation, dated from September 1998 to September 2010. The letters confirmed that the development of the Innovation Village Research Park would not impact historic properties. The Innovation Village Research Park overlaps with less than 5% of the currently proposed Master Plan area to the southeast.

Previously Recorded Built Environment Resources. The South Central Coastal Information Center records search indicates that nine cultural resources have been previously recorded within a 1-mile radius of the proposed Master Plan area. Of these, two previously recorded built environment resources overlap the API. Both resources are located on the campus of Cal Poly Pomona. See Table 4.6-3 below for information on these resources.

Table 4.6-3. Previously Recorded Built Environment Properties Within the API

Primary Number	Description	Recording Events	CHR Status Code	Proximity to the API
P-19-186990	Building 3, (Science Laboratory) California Polytechnic University (Cal Poly), Pomona	2005 (J. Jones, URS Corporation)	6Z	Within
—	W K Kellogg Arabian Horse Ranch	1993 (N. A. Whitney-Desautels and W. H. Bonner)	2S2	Within

Notes: API = Area of Potential Impacts; CHR = California Historical Resource.
Designations:
2S2: Individually determined eligible for NRHP by consensus through Section 106 process. Listed in the CRHR.
6Z: Found ineligible for NRHP, CRHR, or local designation through survey evaluation.

The Science Laboratory (Building No. 3 [P-19-186990]) is a two-story, brick clad, reinforced concrete building with an irregular plan and flat roof. It was first recorded by Jason Jones of URS Corporation in 2005. The building is dated to 1955 and is a good example of institutional architecture built in the mid-century modern style however the building was recommended not eligible as a historical resource and assigned a status code of 6Z. This resource is discussed in the HRTR (Appendix D-2) as the Science Laboratory (Building 3).

The W K Kellogg Arabian Horse Ranch was first recorded by Whitney-Desautels, Nancy A. and Wayne H. Bonner of Scientific Resources Surveys, Inc. in 1993 (LA-03306), however DPR site forms were not returned as part of the CHRIS record search, and the resource does not have an associated primary number. Although called the W K Kellogg Arabian Horse Ranch, this documentation does not evaluate all properties associated with the Kellogg Ranch on Cal Poly's campus; it only includes the residential complex consisting of a SCR-style residence constructed in 1926, a two-story SCR guest house completed in 1928, a garage, a decorative fountain, the remnants of the original entry gate, and a rock-lined driveway that was identified as potentially eligible for the NRHP. SHPO concurred on this finding in 1995 (03/13/1995, FHWA950113A) and the resource is currently assigned a status code of 2S2. The properties discussed in this previous documentation effort are addressed the HRTR (Appendix D-2)as the Kellogg House Pomona (Building 112) and the Kellogg Guest House (Building 113).

Additional Records Reviewed

The following sources provide additional information regarding the potential of built environment resources located within the API. This information was used to understand the history of the area, campus, and how the campus has changed and developed over time.

Books

Various printed books were used in the preparation of the HRTR (Appendix D-2). In particular, three books about the history and development of Cal Poly Pomona and its Arabian horse program were used in the preparation of the HRTR (Appendix D-2): California State Polytechnic University, Pomona: A Legacy and a Mission, 1938-1989 by

Donald Pfleuger (1991); The Kellogg Arabian Ranch: The First Sixty Years by Mary Jane Parkinson (1984); and The Romance of the Kellogg Ranch: A Celebration of the Kellogg/Cal Poly Pomona Arabian Horses, 1925-2000 (2002), also by Mary Jane Parkinson.

Built Environment Resource Directory

The OHP maintains the Built Environment Resource Directory, an inventory of built environment cultural resources that are processed through OHP's office. An August 2, 2024, search of the Built Environment Resource Directory for Los Angeles County identified one building on Cal Poly Pomona's campus that was previously recorded in 2018: the CSU Pomona Kellogg Horse Stables, which is assigned a status code of 3S: Appears eligible for NRHP individually through survey evaluation. This resource is discussed in the HRTR (Appendix D-2)as the University Plaza (Building 26).

Calisphere

Calisphere provides access to 2,000 collections contributed by more than 300 cultural heritage organizations in California, including universities, libraries, archives, museums, and historical societies. Dudek searched for documents relating to the history and development of Cal Poly Pomona (including its history as the W.K. Kellogg Arabian Horse Ranch, the Institute for Animal Husbandry, and as the Pomona Quartermaster Depot) on Calisphere in August 2024. This search identified several historical photographs of the property when it was the W.K. Kellogg Arabian Horse Ranch; historical photographs of the buildings at Cal Poly; and documents related to the development of the College of Environmental Design. Information from these documents is incorporated into the HRTR (Appendix D-2).

Cal Poly Pomona FacilitiesLink

Cal Poly Pomona Facilities staff provided Dudek with access to FacilitiesLink, which holds plans related to campus buildings. Dudek pulled all available plans for historic-age buildings from FacilitiesLink in July 2024. Dudek identified several historic-age buildings without digitized FacilitiesLink plans and requested copies of available plans from Cal Poly Pomona Facilities staff on July 11, 2024. Dudek received digitized plans for available buildings on August 7, 2024. Information from these plans was used to identify dates of construction, architects, and were used in the preparation of the HRTR (Appendix D-2).

Historical Aerials

A review of historical aerial photographs was conducted as part of the archival research effort for the proposed Master Plan through the National Environmental Title Research and the University of California Santa Barbara Frame Finder. The aerial photographs provided a general idea of growth in the Cal Poly Pomona property and surrounding area from the 1920s to the present day. Information from these photographs was used to date properties and landscape features on the campus and is incorporated into the HRTR (Appendix D-2) (NETR 2024a; UCSB 2024).

Historical Maps

Historical maps, including U.S. Geological Survey topographic maps, were examined to determine the growth in the area and how the Cal Poly Pomona property developed over time (NETR 2024b).

Historical Newspapers

Dudek reviewed historical newspapers from the California Digital Newspaper Collection and Newspapers.com covering the Pomona, Walnut, and the Cal Poly Pomona property to understand the development of Cal Poly and the adjacent cities. These documents were used in the preparation of the HRTR (Appendix D-2).

Online Archive of California

The Online Archive of California provides free public access to detailed descriptions of primary resource collections maintained by more than 300 contributing institutions including libraries, special collections, archives, historical societies, and museums throughout California and collections maintained by the 10 University of California campuses. Dudek searched for keywords associated with all periods of the Cal Poly Pomona property's development, architects, and relevant associated individuals in August 2024, which aided in identifying relevant collections for in-person research at Cal Poly's W.K. Kellogg Arabian Horse Library.

W.K. Kellogg Arabian Horse Library Special Collections at Cal Poly Pomona

Dudek architectural historians contacted the W.K. Kellogg Arabian Horse Library Special Collections on May 3, 2024. Archivist Robert Strauss responded on May 6, 2024, and provided information on relevant archival holdings relevant to the development of Cal Poly's campus. Dudek Architectural Historians Claire Cancilla and Katie Ahmanson conducted in-person archival research on July 16, 2024. and Ms. Cancilla also conducted additional in-person research on August 15, 2024. Materials were viewed from the following collections: The W. K. Kellogg Arabian Horse Library Photograph Collection; Donald H. Pflueger California State Polytechnic University, Pomona History Papers; and The Chester O. McCorkle Papers. In addition, Dudek viewed materials from an unprocessed university photographs collection, master plans, and books. Materials from these collections are utilized throughout the HRTR (Appendix D-2).

Establishment of Area of Potential Impacts (API)

The API is the study area delineated to assess potential impacts that could result from proposed Master Plan implementation. The API for built environment resources encompasses the geographic areas within which the proposed Master Plan may directly or indirectly cause a substantial adverse change and therefore material impairment (14 CCR Section 15064.5[b][1]) in the significance of a historical resource. In accordance with CEQA, a substantial adverse change to a historical resource can result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the historical resource is "materially impaired" (i.e., it no longer retains historic integrity and therefore no longer qualifies as a historical resource pursuant to CEQA). Under CEQA, material impairment of a historical resource is considered a significant impact, which can be direct, indirect, or cumulative.[2]

A direct or primary effect on a historical resource is one that is caused by a project and occurs at the same time and place (14 CCR Section 15358[a][1]). Examples of direct effects that are caused by, and immediately related to, the project include, but are not limited to, demolition, destruction, relocation, and alteration of a historical resource as a result of ground disturbance and other construction activities. Direct effects, however, are not limited to physical effects and, in certain circumstances, can be visual, vibratory, auditory, or atmospheric in nature if the effect is immediate and it results in the material impairment of the significance of a historical resource. Visual

[2] As used in the CEQA Guidelines and 14 CCR Section 15358, the terms "effects" and "impacts" are synonymous in this report.

intrusions within the viewshed of a historical resource, for example, could result in the material impairment of the resource's integrity of setting if an unencumbered view of the surrounding area or a specific area is a characteristic that contributes to the significance of the resource. Similarly, operational noise that exceeds the ambient level of a sensitive noise receptor can cause material impairment to a historical resource that derives part or all its significance from an inherently quiet auditory setting. Finally, atmospheric intrusions, such as those caused by the introduction of high levels of fugitive dust emissions or chemical pollutants, can result in adverse effects that directly and physically affect biological landscape features that have been identified as historical resources for the purposes of CEQA. Overall, while direct effects clearly include physical effects, they may also include other types of effects that are visual, vibratory, auditory, or atmospheric in nature if the effect is caused by and occurs at the same time and place as the project and there is no other intervening cause between the activities or components of the project and the historical resource.

By contrast, an indirect or secondary effect is a reasonably foreseeable effect caused by the project that occurs later in time or is farther removed in distance. Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems (14 CCR Section 15358[a][2]). Because these types of effects are not immediately related to the project, they are considered secondary effects.

Cumulative impacts refer to two or more individual effects that, when considered together, are considerable or compound or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (14 CCR Section 15355[a]-[b]). The API for cumulative impacts, if any exist, would include the API for direct effects, indirect effects, or both, since, in order for a cumulative impact to exist, a historical resource must first be directly or indirectly affected by the proposed Master Plan.

The proposed Master Plan will guide the physical campus development within the boundaries of the proposed Master Plan area necessary to support the needs of current and projected students, faculty, and staff through 2040. Built environment historical resources investigations for the overarching Master Plan include both programmatic and project-level analysis. Program-level analysis identifies existing historical resources within the Master Plan areas and provides guidance on the treatment of historical resources, as future projects move toward implementation.

Project-level analysis applies to near-term projects, which are planned within the first 5 to 10 years following proposed Master Plan approval. In addition, properties that are not yet of historic age but will be 45 years old by 2040 have also been identified in the HRTR (to facilitate CEQA compliance throughout implementation of the Master Plan, a set of procedural steps and program-level mitigation measures have been designed for this category of properties).

Delineation of the API therefore considered proposed Master Plan activities in conjunction with built environment properties 45 years of age and older (those built in or prior to 1979) in the proposed Master Plan area that may sustain impacts due to the construction or operation of the proposed Master Plan. Based on the results of the literature review and the background research, for the purposes of this study, the API is commensurate with the boundary of the Master Plan area but is limited to the 83 historic-age properties (buildings, structures, and

landscapes) within the boundary that would be potentially affected by the proposed Master Plan. The 83 historic-age properties comprising the API are listed in Table 4.6-4 below and shown in Figure 4.6-1.

Table 4.6-4. Built Environment Properties Within the Area of Potential Impacts

No.	Name	AIN	Year Built	Previous Historical Resource Status
1	Building One (Old Administration)	8710-002-903, 9710-002-920	1961	Previously unevaluated
2	College of Agriculture	8710-002-903, 9710-002-902	1963	Previously unevaluated
3	Science Laboratory	8710-002-903, 9710-002-902	1956	6Z P-19-186990
5	College of Letters, Arts, and Social Sciences	8710-002-902	1959	Previously unevaluated
6	College of Education and Integrative Studies	8710-003-920	1959	Previously unevaluated
7	College of Environmental Design	8710-002-903	1971	Previously unevaluated
8	College of Science	8710-002-903, 9710-002-902	1976	Previously unevaluated
9	College of Engineering	8710-003-920	1959	Previously unevaluated
13	Art Department/Engineering Annex	8710-003-920	1965	Previously unevaluated
15	Library	8710-003-920	1969	Previously unevaluated
16	Library Mechanical Equipment	8710-003-920	1969	Previously unevaluated
20	Residence Hall, Encinitas	8710-003-920	1960	Previously unevaluated
21	Residence Hall, Montecito	8710-003-920	1960	Previously unevaluated
22	Residence Hall, Alamitos	8710-003-920	1960	Previously unevaluated
23	Residence Hall, Aliso	8710-003-920	1960	Previously unevaluated
24	Music (Arts Complex)	8710-003-920	1963	Previously unevaluated
25	Drama Department/Theatre (Arts Complex)	8710-003-920	1963	Previously unevaluated
26	University Plaza	8710-003-920	1926	3S
26A	Student Orientation Center	8710-003-920	1970	Previously unevaluated
28	Fruit and Crop/Greenhouse	8710-003-921	1970	Previously unevaluated
29	W.K. Kellogg Arabian Horse Center	8710-003-921	1974	Previously unevaluated
29A	Horse Arena	8710-003-921	1974	Previously unevaluated
29B	Weaning Barn	8710-003-921	1974	Previously unevaluated
29C	Animal Health Science	8710-003-921	ca. 1974	Previously unevaluated
29H	Horse Barn	8710-003-921	1974	Previously unevaluated
30	Agriculture Unit	8710-002-902	1957	Previously unevaluated
31	Poultry Unit	8710-002-902	1957	Previously unevaluated
32	Beef Unit/Feed Shed	8710-002-902	1957	Previously unevaluated
33	Feedmill	8710-002-902	1957	Previously unevaluated
34	Meat Lab (Meat Processes Unit)	8710-002-902	1959	Previously unevaluated
35	Bronco Student Center	8710-003-920	1976	Previously unevaluated
37	Swine Unit/Shelters	8710-002-902	1960	Previously unevaluated

Table 4.6-4. Built Environment Properties Within the Area of Potential Impacts

No.	Name	AIN	Year Built	Previous Historical Resource Status
38	Sheep/Wool Unit	8710-002-902	1960	Previously unevaluated
41	Darlene May Gymnasium	8710-003-907	1957	Previously unevaluated
43	Kellogg Gymnasium	8710-003-921	1966	Previously unevaluated
45	Apparel Merchandising and Management	8710-003-920	1960	Previously unevaluated
46	Student Health Services	8710-002-903	1975	Previously unevaluated
47	Agricultural Engineering Tractor Shop	8710-003-920	1960	Previously unevaluated
48	Custodial Services	8710-003-920	1960	Previously unevaluated
49	Training Center	8710-003-920	1928	Previously unevaluated
50	Old Rose Float Lab	8710-003-920	1927	Previously unevaluated
55	Foundation Administration Offices	8710-003-920	1965	Previously unevaluated
57	Traditional Halls – Palmitas Hall	8710-003-920	1968	Previously unevaluated
58	Traditional Halls – Cedritos Hall	8710-003-920	1968	Previously unevaluated
59	Traditional Halls – La Cienega Center	8710-003-920	1971	Previously unevaluated
64	Rose Float Laboratory	8710-003-920	1960	Previously unevaluated
65	Pesticide Building	8710-003-920	1979	Previously unevaluated
70	Los Olivos Dining Commons	8710-003-920	1968	Previously unevaluated
71	Recreation/Maintenance (University Housing Services)	8710-003-920	1975	Previously unevaluated
75	Procurement and Receiving	8710-003-920	1960	Previously unevaluated
76	Kellogg West Education/Dining	8710-002-902	1971	Previously unevaluated
76A	Kellogg West/Addition	8710-002-902	1975	Previously unevaluated
77	Kellogg West Main Lodge	8710-002-902	1971	Previously unevaluated
78	Kellogg West Addition	8710-002-902	1978	Previously unevaluated
81	Facilities Management	8710-003-920	1960	Previously unevaluated
81A	Environmental Health and Safety	8710-003-921	1960	Previously unevaluated
82	Facilities Management Warehouse	8710-003-920	1960	Previously unevaluated
82A	Carpenter's Shop	8710-003-920	1960	Previously unevaluated
83	Auto Shop	8710-003-920	1960	Previously unevaluated
95	Cultural Centers	8710-003-920	1926	Previously unevaluated
96	Paint Shop	8710-003-920	1960	Previously unevaluated
97	Campus Center	8710-003-920, 9710-003-902	1957	Previously unevaluated
111	Manor House	8710-003-920	1926	Previously unevaluated
112	Kellogg House Pomona	8710-003-920	1926	2S2
113	Kellogg Guest House	8710-003-920	1928	2S2
114	Unnamed Residence	8710-003-920	1928	Previously unevaluated
115	Unnamed Residence (890 Citrus Lane)	8710-003-920	1928	Previously unevaluated
141	Unnamed Maintenance Building	8710-003-920	1926	Previously unevaluated
150	MASA House	8710-003-920	1933	Previously unevaluated
L1*	University Quad	8710-003-907 8710-003-921	ca. 1970	Previously unevaluated

Table 4.6-4. Built Environment Properties Within the Area of Potential Impacts

No.	Name	AIN	Year Built	Previous Historical Resource Status
L4*	Rose Garden	8710-003-920	1926–1927	Previously unevaluated
L8*	Voorhis Ecological Preserve	8710-003-907	ca. 1975	Previously unevaluated
L9*	University Plaza Horseshoe Hill	8710-003-920	1926	Previously unevaluated
L13*	Landscaping Behind 890 Citrus Lane	8710-003-920	ca. 1926	Previously unevaluated
L14*	Agricultural Fields	8710-003-920	ca. 1970	Previously unevaluated
L15*	Pond	8709-023-918	ca. 1928	Previously unevaluated
L16*	Manor House Orchard	8710-003-920	ca. 1928	Previously unevaluated
L17*	Orchard	8710-003-920	ca. 1964	Previously unevaluated
S1*	Tennis Courts	8710-003-920	ca. 1960	Previously unevaluated
S2*	Scolinos Baseball Field	8710-003-906	ca. 1970	Previously unevaluated
S3*	Kellogg Stadium	8710-003-903, 8710-003-921	ca. 1960	Previously unevaluated
S4*	Soccer Field	8709-023-908, 8710-003-920	ca. 1975	Previously unevaluated
S5*	Outdoor Basketball	8710-003-902	ca. 1970	Previously unevaluated

Key: AIN: Assessor's Information Number; ca. = circa; MASA = Mexican American Student Association.
* This property does not have an assigned building name or number on Cal Poly's map; this number was assigned in the HRTR (Appendix D-2).
Note: Cal Poly Pomona is in the process of auditing and updating their building information (names/numbers). There may be future inconsistences due to these changes.
California Historical Resources Status Codes:
2S2: Individually determined eligible for NRHP by consensus through Section 106 process. Listed in the CRHR.
3S: Appears eligible for NRHP as an individual property through survey evaluation.
6Z: Found ineligible for NRHP, CRHR, or local designation through survey evaluation.

Field Survey Methodology

Dudek Architectural Historians Claire Cancilla, MSHP and Katie Ahmanson, MHC conducted an intensive survey of the proposed Master Plan area from August 12 to August 14, 2024. Senior Architectural Historian Debi Howell-Ardila, MHP also participated in the intensive-level survey on August 12, 2024. Ms. Cancilla, Ms. Ahmanson, and Ms. Howell-Ardila meet the Secretary of the Interior's Professional Qualifications Standards for architectural history. In preparation for the survey, the project team compiled a set of field maps that included all historic-age built environment properties (buildings, structures, landscape features, and sports fields) that were cataloged in the Cal Poly Pomona FacilitiesLink system, observed during the preliminary desktop survey of the campus, or were present in historical aerial photographs. In instances where a resource lacked an associated Building number in FacilitiesLink, an arbitrary Building number was assigned for documentation purposes.

The survey entailed walking around the exteriors of each historic-era building, landscape feature, and sports facility, documenting each with notes and photographs, specifically noting character-defining features, spatial relationships, and observed alterations. Historic-age properties encountered during the field survey, which were not identified in the initial survey preparations, were documented on site. These properties were subsequently dated through a post-survey review of historical aerial photographs, and if determined to be of historic age, were assigned a Building number.

Survey Results

Overall, a total of 83 properties over 45 years of age (including buildings, structures, landscape features, sporting grounds, and facilities) were recorded and evaluated for historical significance. Among those properties, 49 were identified as ineligible for national or state designation. A total of 34 properties were identified as historical resources pursuant to CEQA. This includes three eligible historic districts: the W.K. Kellogg Arabian Horse Ranch Historic District (with 15 "contributors" or historically significant components), the Mid-Century Modern Campus Core Historic District (with 14 contributors), and the Arabian Horse Center Historic District (with 5 contributors). Among those contributors, 9 are also individually eligible historical resources. Table 4.6-5 below provides an overview of these survey results, broken down by numbers of historic districts, contributors to historic district, properties that are individually eligible, properties that are not historic resources, and properties that will reach 45 years of age by 2040. Table 4.6-6 provides the survey results for all of-age properties within the proposed Master Plan API.

Table 4.6-5. Summary of Survey Results

Category	Number of Resources
Eligible Historic districts	3
Contributors to eligible historic district	34
Contributor to eligible historic district **and** individually eligible	9
Properties over 45 that are not eligible and not CEQA historical resources	49
Properties (not surveyed) that will reach 45 years of age by 2040	20

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Cal Poly Pomona Master Plan Area Boundary
Area of Potential Impacts

Properties in the Area of Potential Impacts

Historic-age Buildings (pre-1980)

1 - Old Administration (1961)
2 - College of Agriculture (1963)
3 - Science Laboratory (1956)
5 - College of Letters, Arts, and Social Sciences (1959)
6 - College of Education and Integrative Studies (1959)
7 - College of Environmental Design (1971)
8 - College of Science (1976)
9 - College of Engineering (1959)
13/13A - Art Department/Engineering Annex (1965)
15 - University Library (1969)
16 - Library Mechanical Equipment (1970)
20 - Encinitas Residential Hall (1960)
21 - Montecito Residential Hall (1960)
22 - Alamitos Residential Hall (1960)
23 - Aliso Residential Hall (1960)
24 - Music (Arts Complex) (1963)
25 - Drama Department/Theatre (1963)
26 - University Plaza (1926)
26A - Student Orientation Center (1970)
28 - Fruit and Crop/Greenhouse(1970)
29 - W.K. Kellogg Arabian Horse Center (1974)
29A - Horse Arena (1974)
29B - Weaning Barn (1974)
29C - Animal Health Science (c. 1974)
29H - Horse Barn (1974)
30 - Agriculture Unit (1957)
31 - Poultry Unit (1957)
32 - Beef Unit (1957)
33 - Feedmill (1957)
34 - Meat Lab (Meat Processes Unit) (1959)
35 - Bronco Student Center (1976)
37 - Swine Unit/Shelters (1960)
38 - Sheep/Wool Unit (1960)
41 - Darlene May Gymnasium (1957)
43 - Kellogg Gymnasium (1966)
45 - Apparel Merchandising and Management (1960)
46 - Student Health Services (1975)
47 - Agricultural Engineering Tractor Shop (1960)
48 - Custodial Services (1960)
49 - Training Center (1928)
50 - Old Rose Float Lab (1927)
55 - Foundation Administration Offices (1965)
57 - Palmitas Hall (1968)
58 - Cedritos Hall (1968)
59 - La Cienga Center
64 - Rose Float Laboratory (1960)
65 - Pesticide Building (1979)
70 - Los Olivos Dining Commons (1968)
71 - Recreation/Maintenance (University Housing Services) (1975)
75 - Procurement/Receiving (1960)
76 - Kellogg West Education/Dining (1971)
76A - Kellogg West/Addition (1975)
77 - Kellogg West Main Lodge (1971)
78 - Kellogg West Addition (1978)
81 - Facilities Management (1960)
81A - Environmental Health and Safety (1960)
82 - Facilities Management Warehouse (1960)
82A - Carpenter's Shop (1960)
83 - Auto Shop (1960)
95 - Cultural Centers (1926)
96 - Paint Shop (1960)
97 - Campus Center (1957)
111 - Manor House (1926)
112 - Kellogg House Pomona (1926)
113 - Kellogg Guest House (1928)
114 - Unnamed Residence (1928)
115 - Unnamed Residence (890 Citrus Lane) (1928)
141 - Unnamed Maintenance Building (1926)
150 - MASA House (1933)

Historic-age Fields and Landscapes (pre-1980)

L1 - University Quad (c. 1970)
L4 - Rose Garden (1926-1927)
L8 - Voorhis Ecological Preserve (c. 1975)
L9 - Union Plaza Horseshoe Hill (1926)
L13 - Landscaping behind 890 Citrus Lane (c. 1926)
L14 - Agricultural Fields (c. 1970)
L15 - Pond (c. 1928)
L16 - Manor House Orchard (c. 1928)
L17 - Orchard (c. 1964)
S1 - Tennis Courts (c. 1960)
S2 - Scolinos Baseball Field (c. 1970)
S3 - Kellogg Stadium (c. 1960)
S4 - Soccer Field (c. 1975)
S5 - Outdoor Basketball (c. 1970)

SOURCE: World Navigation Map; Cal Poly Pomona 2024

DUDEK

0 337.5 675 Feet

FIGURE 4.6-1

Built Environment Properties within the Area of Potential Impacts

Cal Poly Pomona Campus Master Plan EIR

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Table 4.6-6. Survey Results for All Of-Age Properties Within Proposed Master Plan API

No.	Name	Year Built	CEQA Historical Resource	Contributor to a District?	Individually Eligible?	Criteria	CHR Status Code
1	Building One (Old Administration)	1961	Yes	Yes (Mid-Century Modern Campus Core HD)	No	CRHR 1	3CD
2	College of Agriculture	1963	Yes	Yes (Mid-Century Modern Campus Core HD)	No	CRHR 1	3CD
3*	Science Laboratory	1956	Yes	Yes (Mid-Century Modern Campus Core HD)	No	CRHR 1	3CD
5	College of Letters, Arts, and Social Sciences	1959	Yes	Yes (Mid-Century Modern Campus Core HD)	No	CRHR 1	3CD
6	College of Education and Integrative Studies	1959	Yes	Yes (Mid-Century Modern Campus Core HD)	No	CRHR 1	3CD
7	College of Environmental Design	1971	Yes	Yes (Mid-Century Modern Campus Core HD)	Yes	CRHR 1; NRHP/ CRHR C/3	3CD; 3S
8	College of Science	1976	Yes	Yes (Mid-Century Modern Campus Core HD)	No	CRHR 1	3CD
9	College of Engineering	1959	Yes	Yes (Mid-Century Modern Campus Core HD)	No	CRHR 1	3CD
13	Art Department/ Engineering Annex	1965	No	No	No	N/A	6Z
15	Library	1969	Yes	Yes (Mid-Century Modern Campus Core HD)	Yes	CRHR 1, 3	3CB
16	Library Mechanical Equipment	1969	Yes	Yes (Mid-Century Modern Campus Core HD)	Yes	CRHR 1, 3	3CB
20	Residence Hall, Encinitas	1960	No	No	No	N/A	6Z
21	Residence Hall, Montecito	1960	No	No	No	N/A	6Z
22	Residence Hall, Alamitos	1960	No	No	No	N/A	6Z
23	Residence Hall, Aliso	1960	No	No	No	N/A	6Z

Table 4.6-6. Survey Results for All Of-Age Properties Within Proposed Master Plan API

No.	Name	Year Built	CEQA Historical Resource	Contributor to a District?	Individually Eligible?	Criteria	CHR Status Code
24	Music (Arts Complex)	1963	Yes	Yes (Mid-Century Modern Campus Core HD)	No	CRHR 1	3CD
25	Drama Department/ Theatre (Arts Complex)	1963	Yes	Yes (Mid-Century Modern Campus Core HD)	No	CRHR 1	3CD
26*	University Plaza	1926	Yes	Yes (W.K. Kellogg Arabian Horse Ranch HD)	Yes	NRHP/ CRHR A/1	3B
26A	Student Orientation Center	1970	No	No	No	N/A	6Z
28	Fruit and Crop/ Greenhouse	1970	No	No	No	N/A	6Z
29	W.K. Kellogg Arabian Horse Center	1974	Yes	Yes (Arabian Horse Center HD)	No	CRHR 1	3CD
29A	Horse Arena	1974	Yes	Yes (Arabian Horse Center HD)	No	CRHR 1	3CD
29B	Weaning Barn	1974	Yes	Yes (Arabian Horse Center HD)	No	CRHR 1	3CD
29D	Horse Barn	1974	Yes	Yes (Arabian Horse Center HD)	No	CRHR 1	3CD
30	Agriculture Unit	1957	No	No	No	N/A	6Z
31	Poultry Unit	1957	No	No	No	N/A	6Z
32	Beef Unit/Feed Shed	1957	No	No	No	N/A	6Z
33	Feedmill	1957	No	No	No	N/A	6Z
34	Meat Lab (Meat Processes Unit)	1959	No	No	No	N/A	6Z
35	Bronco Student Center	1976	No	No	No	N/A	6Z
37	Swine Unit/ Shelters	1960	No	No	No	N/A	6Z
38	Sheep/Wool Unit	1960	No	No	No	N/A	6Z
41	Darlene May Gymnasium	1957	No	No	No	N/A	6Z
43	Kellogg Gymnasium	1966	No	No	No	N/A	6Z

Table 4.6-6. Survey Results for All Of-Age Properties Within Proposed Master Plan API

No.	Name	Year Built	CEQA Historical Resource	Contributor to a District?	Individually Eligible?	Criteria	CHR Status Code
45	Apparel Merchandising and Management	1960	No	No	No	N/A	6Z
46	Student Health Services	1975	No	No	No	N/A	6Z
47	Agricultural Engineering Tractor Shop	1960	No	No	No	N/A	6Z
48	Custodial Services	1960	No	No	No	N/A	6Z
49	Training Center	1928	Yes	Yes (W.K. Kellogg Arabian Horse Ranch HD)	No	NRHP/ CRHR A/1	3D
49B*	Unnamed Residence	1928	Yes	Yes (W.K. Kellogg Arabian Horse Ranch HD)	No	NRHP/ CRHR A/1	3D
49C*	Unnamed Residence (890 Citrus Lane)	1928	Yes	Yes (W.K. Kellogg Arabian Horse Ranch HD)	No	NRHP/ CRHR A/1	3D
50	Old Rose Float Lab	1927	Yes	Yes (W.K. Kellogg Arabian Horse Ranch HD)	No	NRHP/ CRHR A/1	3D
55	Foundation Administration Offices	1965	No	No	No	N/A	6Z
57	Traditional Halls – Palmitas Hall	1968	No	No	No	N/A	6Z
58	Traditional Halls – Cedritos Hall	1968	No	No	No	N/A	6Z
59	Traditional Halls – La Cienega Center	1971	No	No	No	N/A	6Z
64	Rose Float Laboratory	1960	No	No	No	N/A	6Z
65	Pesticide Building	1979	No	No	No	N/A	6Z
67A	Animal Health Science	ca. 1974	Yes	Yes (Arabian Horse Center HD)	No	CRHR 1	3CD
70	Los Olivos Dining Commons	1968	No	No	No	N/A	6Z

Table 4.6-6. Survey Results for All Of-Age Properties Within Proposed Master Plan API

No.	Name	Year Built	CEQA Historical Resource	Contributor to a District?	Individually Eligible?	Criteria	CHR Status Code
71	Recreation/ Maintenance (University Housing Services)	1975	No	No	No	N/A	6Z
75	Procurement and Receiving	1960	No	No	No	N/A	6Z
76	Kellogg West Education/ Dining	1971	No	No	No	N/A	6Z
76A	Kellogg West/Addition	1975	No	No	No	N/A	6Z
77	Kellogg West Main Lodge	1971	No	No	No	N/A	6Z
78	Kellogg West Addition	1978	No	No	No	N/A	6Z
81	Facilities Management	1960	No	No	No	N/A	6Z
81A	Environmental Health and Safety	1960	No	No	No	N/A	6Z
82	Facilities Management Warehouse	1960	No	No	No	N/A	6Z
82A	Carpenter's Shop	1960	No	No	No	N/A	6Z
83	Auto Shop	1960	No	No	No	N/A	6Z
95	Cultural Centers	1926	Yes	Yes (W.K. Kellogg Arabian Horse Ranch HD)	No	NRHP/ CRHR A/1	3D; 3CS
96	Paint Shop	1960	No	No	No	N/A	6Z
97	Campus Center	1957	Yes	Yes (Mid-Century Modern Campus Core HD)	No	CRHR 1	3CD
111	Manor House	1926	Yes	Yes (W.K. Kellogg Arabian Horse Ranch HD)	Yes	NRHP/CRHR A/1 & C/3	3B
112*	Kellogg House Pomona	1926	Yes	Yes (W.K. Kellogg Arabian Horse Ranch HD)	Yes	NRHP/CRHR A/1 & C/3	2S2; 3B
113*	Kellogg Guest House	1928	Yes	Yes (W.K. Kellogg Arabian Horse Ranch HD)	Yes	NRHP/CRHR A/1 & C/3	3B

Table 4.6-6. Survey Results for All Of-Age Properties Within Proposed Master Plan API

No.	Name	Year Built	CEQA Historical Resource	Contributor to a District?	Individually Eligible?	Criteria	CHR Status Code
141	Unnamed Maintenance Building	1926	Yes	Yes (W.K. Kellogg Arabian Horse Ranch HD)	No	NRHP/ CRHR A/1	3D
150	MASA House	1933	Yes	Yes (W.K. Kellogg Arabian Horse Ranch HD)	Yes	NRHP/ CRHR A/1	3D; 3CS
L1	University Quad	ca. 1970	Yes	Yes (Mid-Century Modern Campus Core HD)	No	CRHR 1	3CD
L4	Rose Garden	1926–1927	Yes	Yes (W.K. Kellogg Arabian Horse Ranch HD)	Yes	NRHP/CRHR A/1 & C/3	3D; 3CS
L8	Voorhis Ecological Preserve	ca. 1975	No	No	No	N/A	6Z
L9	Union Plaza Horseshoe Hill	1926	Yes	Yes (W.K. Kellogg Arabian Horse Ranch HD)	No	NRHP/ CRHR A/1	3D
L13	Landscaping behind 890 Citrus Lane	ca. 1926	No	No	No	N/A	6Z
L14	Agricultural Fields	ca. 1970	No	N/A	No	N/A	6Z
L15	Pond	ca. 1928	Yes	Yes (W.K. Kellogg Arabian Horse Ranch HD)	No	NRHP/ CRHR A/1	3D
L16	Manor House Orchard	ca. 1928	Yes	Yes (W.K. Kellogg Arabian Horse Ranch HD)	No	NRHP/ CRHR A/1	3D
L17	Orchard	ca. 1964	No	N/A	No	N/A	6Z
S1	Tennis Courts	ca. 1960	No	No	No	N/A	6Z
S2	Scolinos Baseball Field	ca. 1970	No	No	No	N/A	6Z

Table 4.6-6. Survey Results for All Of-Age Properties Within Proposed Master Plan API

No.	Name	Year Built	CEQA Historical Resource	Contributor to a District?	Individually Eligible?	Criteria	CHR Status Code
S3	Kellogg Stadium	ca. 1960	No	No	No	N/A	6Z
S4	Soccer Field	ca. 1975	No	No	No	N/A	6Z
S5	Outdoor Basketball	ca. 1970	No	No	No	N/A	6Z

Notes: API = area of potential impacts; CEQA = California Environmental Quality Act; CHR = California Historical Resource; HD = Historic District; CRHR = California Register of Historical Resources; NRHP = National Register of Historic Places; N/A = not applicable; ca. = circa; MASA = Mexican American Student Association.
* Previously evaluated.
California Historical Resource Status Code
2S2: Individually determined eligible for NRHP by consensus through Section 106 process. Listed in the CRHR.
3B: Appears eligible for NRHP both individually and as a contributor to an NRHP-eligible multicomponent resource, like a district, through survey evaluation.
3D: Appears eligible for NRHP as a contributor to an NRHP-eligible multicomponent resource through survey evaluation.
3S: Appears eligible for NRHP individually through survey evaluation.
3CB: Appears eligible for CRHR both individually and as a contributor to a CRHR-eligible multicomponent resource through survey evaluation.
3CD: Appears eligible for CRHR as a contributor to a CRHR-eligible multicomponent resource through survey evaluation.
3CS: Appears eligible for CRHR individually through survey evaluation.
6Z: Found ineligible for NRHP, CRHR, or local designation through survey evaluation.

Summary of Eligible Historic Districts

As noted previously, the survey identified three eligible historic districts within the API:

- The W.K. Kellogg Arabian Horse Ranch Historic District
- The Mid-Century Modern Campus Core Historic District
- The Arabian Horse Center Historic District

Additional detail, including statements of significance, and contributors and non-contributors, is provided below.

W.K. Kellogg Arabian Horse Ranch Historic District

The W.K. Kellogg Arabian Horse Ranch Historic District consists of a noncontiguous collection of 15 related properties that appear eligible under NRHP/CRHR Criteria A/1. The period of significance is 1926 through 1949. The district exemplifies one of the most significant eras of expansion in Pomona, the 1920s, as well as the regional embrace, by wealthy landowners, of the large-scale, landscaped estate. During this era, with the automobile facilitating access, the W.K. Kellogg estate was established on the site; the associated ranch quickly became a world-renowned Arabian horse breeding and training ground. The estate was established by cereal magnate W.K. Kellogg (but was not associated with his years founding and leading the Kellogg Company in Battle Creek, Michigan). Associated properties across the noncontiguous district include but are not limited to a series of single-family residences with associated landscaping, a rose garden, stables, and other secondary buildings, structures, and features. Contributing resources to the W.K. Kellogg Arabian Horse Ranch Historic District are listed below in Table 4.6-7 and presented in Figure 4.6-2, W.K. Kellogg Arabian Horse Ranch Historic District. The Kellogg-era rock walls, streetlamps and entrance gate illustrated in Figure 4.6-2 are contributing features associated with the Kellogg House Pomona (Building 112).

Table 4.6-7. Properties Within the Eligible W.K. Kellogg Arabian Horse Ranch Historic District

No.	Name	Year Built	Contributor Status
26	University Plaza	1926	Contributor
49	Training Center	1928	Contributor
50	Old Rose Float Lab	1927	Contributor
95	Cultural Centers	1926	Contributor
111	Manor House	1926	Contributor
112	Kellogg House Pomona	1926	Contributor
113	Kellogg Guest House	1928	Contributor
114	Unnamed Residence	1928	Contributor
115	Unnamed Residence (890 Citrus Lane)	1928	Contributor
141	Unnamed Maintenance Building	1926	Contributor
150	MASA House	1933	Contributor
L4*	Rose Garden	1926–1927	Contributor
L9*	Union Plaza Horseshoe Hill	1926	Contributor
L15*	Pond	ca. 1928	Contributor
L16*	Manor House Orchard	ca. 1928	Contributor

Notes: ca. = circa; MASA = Mexican American Student Association; * This property does not have an assigned building name or number on Cal Poly's map; a number was assigned for the purposes of the HRTR (Appendix D-2).

Mid-Century Modern Campus Core Historic District

The Mid-Century Modern Campus Core Historic District appears eligible as an intact, textbook exemplification of significant patterns of development and trends in postwar planning and campus design. The period of significance for the historic district is 1956 to 1976, spanning the University's early years through its maturation in the late 1970s. Due to the presence of in-fill development outside the period of significance, in particular facing the central quad, the Mid-Century Modern Campus Core Historic District is eligible for the CRHR only. The 14 contributing resources and 5 non-contributing resources located within the Mid-Century Modern Campus Core Historic District boundary are listed below in Table 4.6-8 and presented in Figure 4.6-3, Mid-Century Modern Campus Core Historic District. Among the 14 contributing resources, 6 are considered of primary (or most important) significance, and the remaining 8 are considered of secondary (or supporting) significance.



SOURCE: Cal Poly Pomona 2024

DUDEK

0 175 350 Feet

FIGURE 4.6-2

W.K. Kellogg Arabian Horse Ranch Historic District

Cal Poly Pomona Campus Master Plan EIR

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SOURCE: Cal Poly Pomona 2024

DUDEK

0 100 200 Feet

FIGURE 4.6-3

Mid-Century Modern Campus Core Historic District

Cal Poly Pomona Campus Master Plan EIR

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Table 4.6-8. Properties Within the Eligible Mid-Century Modern Campus Core Historic District

No.	Name	Year Built	Contributor Status and Level
1	Building One (Old Administration)	1961	Contributor (primary)
2	College of Agriculture	1963	Contributor (secondary)
3	Science Laboratory	1956	Contributor (secondary)
4	Biotechnology Building	1999	Non-Contributor
4A	BioTrek Learning Center	2000	Non-Contributor
5	College of Letters, Arts, and Social Sciences	1959	Contributor (primary)
6	College of Education and Integrative Studies	1959	Contributor (primary)
7	College of Environmental Design	1971	Contributor (secondary)
8	College of Science	1976	Contributor (primary)
9	College of Engineering	1959	Contributor (secondary)
15	Library	1969	Contributor (secondary)
16	Library Mechanical Equipment	1969	Contributor (secondary)
24	Music (Arts Complex)	1963	Contributor (secondary)
25	Drama Department/Theatre (Arts Complex)	1963	Contributor (secondary)
92	Laboratory Facility	1993	Non-Contributor
94	University Office Building	1984	Non-Contributor
95	Cultural Centers	1926	Non-Contributor
97	Campus Center	1957	Contributor (primary)
L1*	University Quad	ca. 1970	Contributor (primary)

Key: ca. = circa;
* This property does not have an assigned building name or number on Cal Poly's map; this number for the purposes of the HRTR (Appendix D-2).

Arabian Horse Center Historic District

The Arabian Horse Center Historic District consists of the buildings and structures that compose the W.K. Kellogg Arabian Horse Center, an important breeding and training program originally founded by W.K. Kellogg in 1926 and housed in the University Plaza (Building 26). In 1974, the Kellogg Arabian Horse Center moved to its current purpose-built location. The district includes a stadium, barns, stables, and other structures. This eligible historic district exemplifies the significant evolution of the Kellogg Arabian program into one of the largest Arabian horse breeding programs in the United States under Cal Poly's stewardship and appears eligible under NRHP/CRHR Criteria A/1. The period of significance for this district is 1974. The five contributing resources and three non-contributing resources located within the Arabian Horse Center Historic District boundary are listed below in Table 4.6-9 and presented in Figure 4.6-4, Arabian Horse Center Historic District.

Table 4.6-9. Properties Within the Eligible Arabian Horse Center Historic District

No.	Name	Year Built	Contributor Status
29	W.K. Kellogg Arabian Horse Center	1974	Contributor
29A	Horse Arena	1974	Contributor
29B	Weaning Barn	1974	Contributor
29C	Animal Health Science	ca. 1974	Contributor

Table 4.6-9. Properties Within the Eligible Arabian Horse Center Historic District

No.	Name	Year Built	Contributor Status
29D	Barn	2005	Non-Contributor
29H*	Horse Barn	1974	Contributor
29I*	Barn	2005	Non-Contributor
67	Animal Health Science	1980	Non-Contributor

Key: ca. = circa;
***** This property does not have an assigned building name or number on Cal Poly's map; a number was assigned for the purposes of the HRTR (Appendix D-2).

Summary of Individual Resource Eligibility

The following section provides an overview of the nine properties that are eligible individually (as well as contributors to one of the three identified eligible historic districts). Information about these properties is provided in Table 4.6-10 and illustrated in Figure 4.6-5 Individually Eligible Properties. A detailed significance summary for each resource is included in the compiled Department of Parks and Recreation form set located in Appendix D-2.

Table 4.6-10. Individually Eligible Properties

No.	Name	Year Built	HD Contributor Status	Individually Eligible?	Applicable HD/Individual NRHP/CRHR/CHL Criteria
7	College of Environmental Design	1971	Mid-Century Modern Campus Core HD Contributor	Yes	**HD:** CRHR 1 **Individual:** NRHP/CRHR C/3 (Does not qualify under the CHL Criteria)
15	Library	1969	Mid-Century Modern Campus Core HD Contributor	Yes	**HD:** CRHR 1 and 3 **Individual:** CRHR 1 and 3 (Does not qualify under the CHL Criteria)
16	Library Mechanical Equipment	1969	Mid-Century Modern Campus Core HD Contributor	Yes	**HD:** CRHR 1 and 3 **Individual:** CRHR 1 and 3 (Does not qualify under the CHL Criteria)
26	University Plaza	1926	W.K. Kellogg Arabian Horse Ranch HD Contributor	Yes	**HD:** NRHP/CRHR A/1 **Individual:** NRHP/CRHR A/1 (Does not qualify under the CHL Criteria)
111	Manor House	1926	W.K. Kellogg Arabian Horse Ranch HD Contributor	Yes	**HD:** NRHP/CRHR A/1 **Individual:** NRHP/CRHR C/3 (Does not qualify under the CHL Criteria)
112	Kellogg House Pomona	1926	W.K. Kellogg Arabian Horse Ranch HD Contributor	Yes	**HD:** NRHP/CRHR A/1 **Individual:** NRHP/CRHR C/3 (Does not qualify under the CHL Criteria)
113	Kellogg Guest House	1928	W.K. Kellogg Arabian Horse Ranch HD Contributor	Yes	**HD:** NRHP/CRHR A/1 **Individual:** NRHP/CRHR C/3

Table 4.6-10. Individually Eligible Properties

No.	Name	Year Built	HD Contributor Status	Individually Eligible?	Applicable HD/Individual NRHP/CRHR/CHL Criteria
					(Does not qualify under the CHL Criteria)
150	MASA House	1933	W.K. Kellogg Arabian Horse Ranch HD Contributor	Yes	**HD:** NRHP/CRHR A/1 **Individual:** NRHP/CRHR A/1 (Does not qualify under the CHL Criteria)
L4*	Rose Garden	1926–1927	W.K. Kellogg Arabian Horse Ranch HD Contributor	Yes	**HD**: NRHP/CRHR A/1 **Individual:** NRHP/CRHR C/3 (Does not qualify under the CHL Criteria)

Notes: HD = Historic District; NRHP = National Register of Historic Places; CRHR = California Register of Historical Resources; CHL = California Historical Landmark; MASA = Mexican American Student Association;

* This property does not have an assigned building name or number on Cal Poly's map; number was assigned for the purposes of the HRTR (Appendix D-2).

Continuing Best Practices

As stated in Chapter 3, Project Description, the following Continuing Best Practices (CBPs) are best practice recommendations which may be applied to the identified historic resources during Master Plan implementation (see Chapter 3, Project Description for the specific text of each applicable CBP). The CBPs will be incorporated into the Master Plan's Mitigation Monitoring and Reporting Program, which will be adopted by the CSU Board of Trustees when they consider approval of the proposed Master Plan:

- CBP-1: Strategies for Secretary's Standards Compliance
- CBP-2: Window Rehabilitation for Historical Resources
- CBP-3: Preservation of Architectural Details
- CBP-4: Roof Forms and Features
- CBP-5: Site Plan Design and Landscape Features
- CBP-6: Façade Treatments
- CBP-7: Seismic Upgrades
- CBP-8: Americans with Disabilities Act (ADA) Compliance and Access
- CBP-9: Additions and New Construction

4.6.4 Impacts Analysis

4.6.4.1 Project Impacts

Impact 4.6-1 The project could result in substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. (Potentially Significant)

The HRTR (Appendix D-2) completed in support of this EIR identified a total of 34 properties within the API that qualify as historical resources pursuant to CEQA (another 48 properties of the survey sample did not qualify as historical resources). This number includes 3 eligible historic districts: the W.K. Kellogg Arabian Horse Ranch

Historic District (with 15 contributing resources), the Mid-Century Modern Campus Core Historic District (with 14 contributing resources), and the Arabian Horse Center Historic District (with 5 contributing resources). A total of 9 eligible historic district contributors are also individually eligible for landmark designation at the federal and/or state levels. In addition, over the course of the proposed Master Plan planning horizon (up to 2040), another 20 properties will reach the age threshold (45 years) at which a historical resources evaluation will be warranted. See the HRTR for full evaluations and results (Appendix D-2).

Overall, many of the proposed Master Plan projects (1) would not involve physical changes to identified historical resources; (2) are not adjacent to historical resources; and/or (3) do not involve properties that will reach 45 years of age by 2040, the year marking build-out of the proposed Master Plan. In addition, the proposed Master Plan prioritizes retention of facilities and minimal demolition and new construction. As shown Appendix D-2, many of the planned projects do not involve a historical resource. However, as a result of this impact analysis, four significant, direct adverse impacts to historical resources were identified:

1. Mid-Century Modern Campus Core Historic District
2. College of Environmental Design (Building 7)
3. Library (Building 15)
4. Arabian Horse Center Historic District

Table 4.6-11 provides an overview of each identified historical resource involving proposed Master Plan demolitions or changes. Following the table, each project component and the accompanying discussion of related impacts are described.



SOURCE: Cal Poly Pomona 2024

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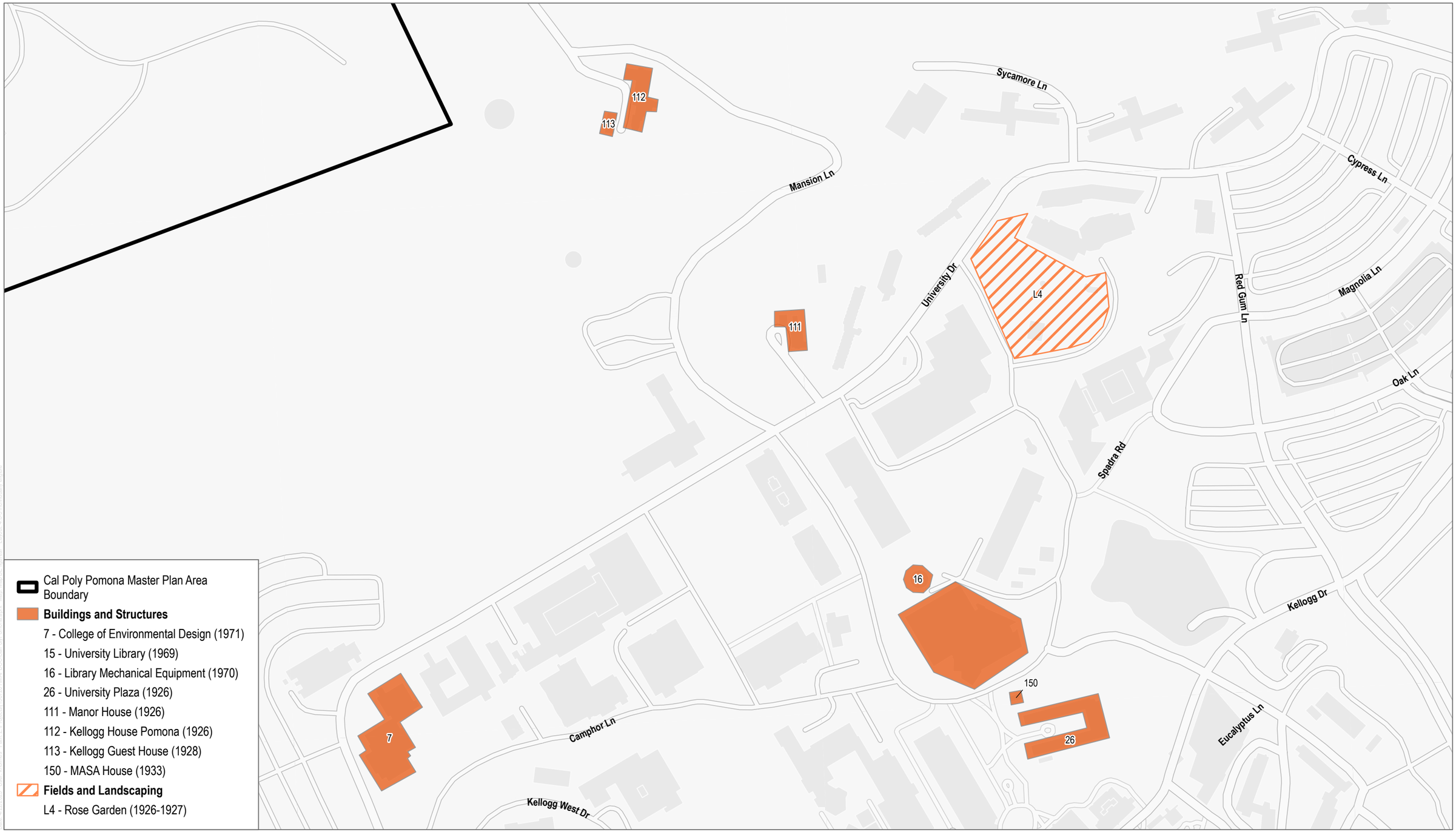
0 75 150 Feet

FIGURE 4.6-4

Arabian Horse Center Historic District

Cal Poly Pomona Campus Master Plan EIR

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SOURCE: Cal Poly Pomona 2024

DUDEK

0 137.5 275 Feet

FIGURE 4.6-5

Individually Eligible Properties

Cal Poly Pomona Campus Master Plan EIR

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Table 4.6-11. Historic Resources Involving Proposed Master Plan Demolitions or Changes to Exterior Building Envelopes

No.	Name	CEQA Historical Resource	District Contributor	Individually Eligible	Proposed Master Plan	Potentially Significant Direct or Indirect Impact
Mid-Century Modern Campus Core Historic District						
1	Building One (Administration) *(Near-Term Project)*	Yes	Yes	No	Renovation	Potential direct impact to historic district through physical changes to a contributing element of the district
2	College of Agriculture	Yes	Yes	No	Renovation	Potential direct impact to historic district through physical changes to a contributing element of the district
5	College of Letters, Arts, and Social Sciences *(Near-Term Project)*	Yes	Yes	No	Renovation including changes to exterior building envelop	Potential direct impact to historic district through physical changes to a contributing element of the district
6	College of Education and Integrative Studies	Yes	Yes	No	Renovation	Potential direct impact to historic district through physical changes to a contributing element of the district
7	College of Environmental Design *(Near-Term Project)*	Yes	Yes	Yes	Renovation including changes to exterior building envelop	Potential direct impact to historic district and to the College of Environmental Design through physical changes to a contributing element of the district
8	College of Science *(Near-Term Project)*	Yes	Yes	No	Renovation including changes to exterior building envelop	Potential direct impact through physical changes to a contributing element of the district
9	College of Engineering *(Near-Term Project)*	Yes	Yes	No	New Construction, Engineering Graduate Building (Building 14) Renovation of Engineering Labs (Building 17) and College of Engineering	Potential indirect impact through change to setting and feeling of the district and to the University Library (Building 15) Potential direct impact to the historic district through physical

Table 4.6-11. Historic Resources Involving Proposed Master Plan Demolitions or Changes to Exterior Building Envelopes

No.	Name	CEQA Historical Resource	District Contributor	Individually Eligible	Proposed Master Plan	Potentially Significant Direct or Indirect Impact
					(Building 9) including changes to exterior building envelopes	changes to a contributing element of the district
15	Library *(Near-Term Project)*	Yes	Yes	Yes	Renovation including exterior site improvements	Potential direct impact to an individually eligible historical resource and to the historic district
24	Music (Arts Complex)	Yes	Yes	No	Major Renovation and Addition	Potential direct impact to historic district, through a possible loss of character-defining features and historic integrity of contributing properties
25	Drama Department/ Theatre (Arts Complex)	Yes	Yes	No	Total Renovation or Replacement	Potential direct impact to the historic district, through a possible loss of the contributing property and/or loss of character-defining features and historic integrity
97	Campus Center	Yes	Yes	No	Demolition and replacement of Campus Center and Interdisciplinary Academic Resources Building (Building 10)	Potential direct impact to the historic district through a possible loss of the contributing property and/or loss of character-defining features and historic integrity
W.K. Kellogg Arabian Horse Center Historic District						
29	W.K. Kellogg Arabian Horse Center	Yes	Yes	No	Renovation and Event Center addition	Potential direct impact through renovations to a contributing feature to the historic district. Impacts could result through a possible loss of character-defining features and historic integrity of a contributing property

Program-Level Analysis for the Master Plan

Among the proposed Master Plan projects which would be completed as funding is available, at least six would involve historical resources.

Proposed Master Plan projects involving historical resources include a variety of major renovation upgrades, or demolition, most of which would affect contributors to the Mid-Century Modern Campus Core Historic District:

1. College of Agriculture (Building 2)
2. College of Education and Integrative Studies (Building 6)
3. Music (Arts Complex) (Building 24)
4. Drama Department/Theatre (Building 25)
5. W.K. Kellogg Arabian Horse Center (Building 29)
6. Campus Center (Building 97)

The proposed upgrades include potential direct changes to materials and features that are "character defining" (i.e., historically significant) for the historical resources. These include, but are not limited to, "improvements" to exterior envelopes, changes to windows and roofs, seismic upgrades, and other changes that could affect character-defining features. At present, no information is available on the project details, including proposed treatment approaches, replacement materials, or details of upgrades and how those efforts will avoid obscuring or destroying character-defining features. In addition, proposed changes to the Drama Department/Theatre (Arts Complex) (Building 25) include a potential demolition and replacement, or a total renovation. Demolition of the Campus Center (Building 97) is also being considered to provide for the new Campus Center and Interdisciplinary Academic Resources Building (Building 10).

When considered in tandem with other proposed Master Plan projects (including near- and long-term projects) that would be likely to affect character-defining features to the historic district, this project component could contribute to the overall loss of integrity for the Mid-Century Modern Campus Core Historic District and the Arabian Horse Center Historic District. See Impact Summary below for impact conclusions.

Project-Level Analysis for Near-Term Projects

In terms of specific project components for mobility and circulation improvements, none of the near-term projects would be expected to result in significant direct or indirect impacts to historical resources. The project components do not involve identified historical resources nor properties that will reach 45 years of age by 2040, the year marking the build-out of the proposed Master Plan. Overall spatial relationships between circulation corridors, open space, and buildings/structures and landscaping would be preserved. Moreover, the new Campus Transit Center (Bronco Mobility Hub [Building 133]) is not adjacent to eligible historical resources, and its construction would not be expected to result in direct or indirect impacts to historical resources. In addition, none of the proposed activities involve properties that will reach 45 years of age by 2040.

In terms of utility infrastructure improvements, neither the well water and water treatment plant expansion nor the new domestic reserve water tank would be expected to result in either direct or indirect significant adverse impacts to historical resources. These proposed near-term projects do not involve historical resources, nor are they adjacent to known historical resources. In addition, none of the impacted facilities involve properties that will reach 45 years of age by 2040, the year marking the build-out of the proposed Master Plan.

An analysis of the remaining individual near-term projects that could result in or contribute to historic resource impacts are discussed below. As disclosed in the HRTR other near-term projects would not result in or contribute to historic resource impacts (see Appendix D-2). See Impact Summary below for impact conclusions.

New Construction

Engineering Graduate Building: The new Engineering Graduate Building (Building 14) would be located southeast of the existing Engineering Building and would have a total building area of approximately 80,000 GSF. The new building would be up to three stories. It is located adjacent to two historical resources—the College of Engineering (Building 9) and the University Library (Building 15). It is just outside of the boundaries of the Mid-Century Modern Campus Core Historic District. At present, no additional information is available on the proposed building footprint/location, plan for massing/volume, materials, or architectural style. The setting of the University Library has already changed, including, but not limited to, a significant addition along the south elevation. In addition, the setting of the Mid-Century Modern Campus Core Historic District has changed over time, with buildings from outside the period of significance within the district boundary (including one non-contributing building facing the central quad).

A new three-story building adjacent to these two historical resources might potentially further diminish the integrity of their setting and feeling. Such potential indirect impacts could be mitigated through project design, siting, and a focus on a compatible but differentiated design. When considered in tandem with other Master Plan projects that could affect character-defining features to the historic district and other historical resources, this project component could contribute to the overall loss of integrity for the Mid-Century Modern Campus Core Historic District and the University Library.

Renovation

College of Letters, Arts, and Social Sciences: The total renovation of the 76,600 GSF College of Letters, Arts, and Social Sciences (Building 5) would address deferred maintenance and required code upgrades including seismic reinforcing, replacement of building systems, and improvements to the exterior envelope for greater efficiency and sustainability. The interior would be reconfigured to meet strategic and academic plan goals with active learning classrooms, spaces for study and collaboration, and shared faculty and departmental workspaces. The College of Letters, Arts, and Social Sciences (Building 5) is a historical resource pursuant to CEQA; it is a contributor to the Mid-Century Modern Campus Core Historic District, which is eligible for the CRHR. The project includes potential direct changes to materials and features that are “character defining” (i.e., historically significant) for the historical resources. These include but are not limited to “replacement of the exterior envelope” of the building, as well as seismic reinforcement. At present, no information is available on the project details, including proposed treatment approaches, replacement materials, or details of seismic retrofitting and how those will avoid obscuring or destroying character-defining features.

When considered in tandem with other Master Plan projects (including near- and long-term projects) that would be likely to affect character-defining features to the historic district, this project component could contribute to the overall loss of integrity for the Mid-Century Modern Campus Core Historic District.

College of Environmental Design: The total renovation of the 51,000 GSF College of Environmental Design (Building 7) would address deferred maintenance and required upgrades for seismic reinforcing, replacement of building systems, and improvements to the exterior envelope for efficiency and sustainability. The interior would be reconfigured to expand usable space and better utilize the courtyard for ”hands-on” project space.

The College of Environmental Design (Building 7) is a historical resource pursuant to CEQA; it is a contributor to the Mid-Century Modern Campus Core Historic District, which is eligible for the CRHR, and it is individually eligible for the CRHR. The project includes potential direct changes to materials and features that are "character defining" (i.e., historically significant) for the historical resources. These include, but are not limited to, "upgrades" for seismic systems and the exterior envelope of the building. At present, no information is available on the project details, including proposed treatment approaches, replacement materials, or details of seismic retrofitting and how those efforts will avoid obscuring or destroying character-defining features.

When considered in tandem with other Master Plan projects (including near- and long-term projects) that would be likely to affect character-defining features to the historic district, this project component could contribute to the overall loss of integrity for the Mid-Century Modern Campus Core Historic District.

In addition, because the College of Environmental Design is individually eligible, project implementation could result in an additional significant direct adverse impact to the building, should it lose enough character-defining features that it longer conveys the reasons for its significance.

Engineering Labs/College of Engineering: The 12,000 GSF Engineering Labs (Building 17) and 137,900 GSF College of Engineering (Building 9) renovation would address deferred maintenance and make required code upgrades including the total replacement of all building systems and improvements to the exterior envelope for efficiency and sustainability. The interior would be reconfigured to meet active learning space standards and to add lab capacity as needed to advance strategic and academic goals for the College of Engineering. The College of Engineering (Building 9) is a historical resource pursuant to CEQA; it is a contributor to the Mid-Century Modern Campus Core Historic District, which is eligible for the CRHR.

This project includes potential direct changes to materials and features that are "character defining" (i.e., historically significant) for the historical resources. These include, but are not limited to, "improvements" to the exterior envelope of the building. At present, no information is available on the project details, including proposed treatment approaches, replacement materials, or details of upgrades and how those efforts will avoid obscuring or destroying character-defining features.

When considered in tandem with other Master Plan projects (including near- and long-term projects) that would be likely to affect character-defining features to the historic district, this project component could contribute to the overall loss of integrity for the Mid-Century Modern Campus Core Historic District.

Old Administration Building: The 82,000 GSF major renovation of the Old Administration Building (Building 1) would address deferred maintenance and required code upgrades, including seismic reinforcing and replacement of building systems. The interior would be reconfigured to meet strategic and academic plan goals with more efficient resources and workspaces. The Old Administration Building (Building 1) is a historical resource pursuant to CEQA; it is a contributor to the Mid-Century Modern Campus Core Historic District, which is eligible for the CRHR.

This project includes potential direct changes to materials and features that are "character defining" (i.e., historically significant) for the historical resources. At present, no information is available on the project details, including proposed treatment approaches, replacement materials, or details of seismic retrofitting and how those will avoid obscuring or destroying character-defining features.

When considered in tandem with other Master Plan projects (including near- and long-term projects) that would be likely to affect character-defining features to the historic district, this project component could contribute to the overall loss of integrity for the Mid-Century Modern Campus Core Historic District.

College of Science: This project would include repurposing space in the 136,300 GSF College of Science (Building 8) for instructional labs. This major renovation would address deferred maintenance and required code upgrades, including seismic reinforcing, replacement of building systems, and potential improvements to the exterior envelope, including the roof and windows, for efficiency and sustainability. Where needed, the interior would be reconfigured to meet strategic and academic plan goals and the needs of the College of Science. The College of Science Building (Building 8) is a historical resource pursuant to CEQA; it is a contributor to the Mid-Century Modern Campus Core Historic District, which is eligible for the CRHR.

This project includes potential direct changes to materials and features that are "character defining" (i.e., historically significant) for the historical resources. At present, no information is available on the project details, including proposed treatment approaches, replacement materials, or details of seismic retrofitting and how those will avoid obscuring or destroying character-defining features.

When considered in tandem with other Master Plan projects (including near- and long-term projects) that would be likely to affect character-defining features to the historic district, this project component could contribute to the overall loss of integrity for the Mid-Century Modern Campus Core Historic District.

Library: The renovation of the existing 218,000 GSF Library (Building 15) includes several site improvements, such as the demolition of the existing pedestrian bridge, widening of the fire lane and turnaround, and installation of two additional fire hydrants. Interior improvements to the library include staircase and elevator improvements, drinking fountain replacement, full restroom renovation, lighting upgrades, acoustical ceiling system upgrades, and wall and floor replacement. The Library (Building 15) and its adjacent support structure, the Library Mechanical Equipment building (Building 16), are historical resources pursuant to CEQA; they are contributors to the Mid-Century Modern Campus Core Historic District, which is eligible for the CRHR, and they are individually eligible for the CRHR.

This project includes potential direct changes to materials and features that are "character defining" (i.e., historically significant) for the historical resources. At present, no information is available on the project details, including proposed treatment approaches, replacement materials, or details of seismic retrofitting and how those will avoid obscuring or destroying character-defining features.

When considered in tandem with other Master Plan projects (including near- and long-term projects) that would be likely to affect character-defining features to the historic district, this project component could contribute to the overall loss of integrity for the Mid-Century Modern Campus Core Historic District.

Impact Summary

In summary, given the extent of the proposed changes, both in terms of volume and degree, full build-out of the proposed Master Plan would be expected to result in significant adverse direct impacts to historical resources. Proposed Master Plan projects that could result in significant adverse impacts to historical resources include, but are not necessarily limited to, demolition, major/total renovations, and adjacent new construction that could directly or indirectly affect identified historical resources. The following section describes the significant adverse impacts to historical resources likely to result from proposed Master Plan implementation.

Mid-Century Modern Campus Core Historic District

The focus for Master Plan upgrades, modernization activities, and renovation will be the campus's historic core, which includes a CRHR-eligible historic district. (Due to alterations, including the presence of a non-contributing building facing the campus quad, the district is not eligible for the NRHP.) The proposed Master Plan includes physical changes to all the buildings that contribute to the historical significance of the district (one district contributor is a landscape feature and is not slated for changes). Proposed Master Plan changes include demolition of one building (Campus Center, Building 97), potential "replacement" (or "total renovation") of the Drama Department/Theatre (Arts Complex, Building 25), and a variety of renovation projects, including scopes of work characterized in the proposed Master Plan as either "major" or "total" renovations, for the remainder of the district's 14 contributors (excepting the central quad).

Projects include addressing deferred maintenance and code upgrades for seismic reinforcing, replacement of building systems, and potential improvements and in some cases "replacement" of windows and exterior building envelopes, which would affect some of the most important character-defining features of the historic buildings. Proposed physical changes to the Library (Building 15), which is a historic district contributor and individually eligible, include demolition of the existing pedestrian bridge. A new, 80,000 GSF, three-story Engineering Graduate Building (Building 14) would be added southeast of the Engineering Building; the building site is outside of the boundaries of the Mid-Century Modern Campus Core Historic District. The new building adjacent to two historical resources might potentially diminish the integrity of their setting and feeling.

At present, project plans are conceptual in nature. However, based on the range and extent of maintenance and seismic stability issues in need of correction for most of the contributors to the historic district, implementation of the proposed Master Plan could result in significant adverse impacts and material impairment to historical resources through the loss of character-defining features and therefore historic integrity. Under CEQA, material impairment to historical resources occurs when a historical resource no longer conveys the reasons for its significance due to alterations, incompatible changes, and/or the loss of character-defining features.

In terms of the various work efforts included in the proposed Master Plan, the Campus Center (Building 97) would be demolished. The Campus Center building is a primary contributor to the Mid-Century Modern Core Historic District. Typically, under CEQA, demolition of historical resources cannot be mitigated to less than significant. In this case, the historical resource is the historic district itself, which includes six primary contributors, facing and including the campus quad, and eight secondary contributors, which do not directly face the campus quad but nevertheless form part of a cohesive collection of related buildings conveying the significance of the historic district.

Other proposed Master Plan upgrades to historic district contributors include actions that could impact character-defining features of historical resources, both directly (with planned upgrades and modernization projects) and indirectly (with new construction within the historic district).

In summary, proposed changes to historic district contributors are highly conceptual at present. However, with the level of change proposed for all contributors to the historic district, including the demolition of one contributor (and the possible demolition of another), proposed Master Plan implementation would be likely to result in significant adverse impacts to historical resources through the extent, in volume and degree, of the physical changes planned for the Mid-Century Modern Campus Core Historic District. Therefore, the impact would be **significant**.

Implementation of the proposed Master Plan would adversely affect the Mid-Century Modern Campus Core Historic District, through the demolition of contributing resources, major renovation/rehabilitation of contributing resources,

and new in-fill construction within the historic district. Implementation of Mitigation Measures MM-HBE-1 through MM-HBE-5 would lessen and avoid some significant adverse impacts to historical resources. Following mitigation, impacts would still be **significant unavoidable**. See Section 4.6.5, Mitigation Measures, for the full text of these mitigation measures.)

College of Environmental Design

The proposed Master Plan calls for the "total renovation of the 51,000 GSF College of Environmental Design (Building 7)." Related work efforts "would address deferred maintenance and required upgrades for seismic, building systems, and exterior envelope for efficiency and sustainability. The interior would be reconfigured to expand usable space and better utilize the courtyard for 'hands-on' project space." Changes to the building's exterior envelope and site overall could include physical changes to some of the building's most important character-defining features.

At present, project plans are conceptual in nature. However, based on the range and extent of deferred maintenance and seismic stability issues in need of correction, implementation of the proposed Master Plan could result in significant adverse impacts and material impairment to historical resources through the loss of character-defining features and therefore historic integrity. Under CEQA, material impairment to historical resources occurs when a historical resource no longer conveys the reasons for its significance due to alterations, incompatible changes, and/or the loss of character-defining features.

With the project highly conceptual at this stage, given the importance of the resource and the extent of the total renovation, this project component would be likely to cause a significant adverse impact to the College of Environmental Design, which is both a historic district contributor and individually eligible for landmark designation at the federal and state levels. Therefore, the impact would be **significant**.

Implementation of the proposed Master Plan would adversely affect the College of Environmental Design (Building 7), through alterations to character-defining features and a potential loss of historic integrity. Implementation of MM-HBE-1 through MM-HBE-5 would lessen and avoid some significant adverse impacts to the College of Environmental Design. Following mitigation, impacts would still be **significant unavoidable**. (See Section 4.6.5, Mitigation Measures, for the full text of these mitigation measures.)

Library

The proposed Master Plan calls for a series of primarily fire, life safety, and seismic upgrades. The project description describes these upgrades as follows:

> The renovation of the existing 218,000 GSF Library (Building 15) includes several site improvements, such as the demolition of the existing pedestrian bridge, widening of the fire lane and turnaround, and installation of two additional fire hydrants. Interior improvements to the library include staircase and elevator improvements, drinking fountain replacement, full restroom renovation, lighting upgrades, acoustical ceiling system upgrades, and wall and floor replacement.

At present, project plans are conceptual in nature. However, based on the range and extent of issues in need of correction, in addition to the planned demolition of the pedestrian bridge, implementation of the proposed Master Plan could result in significant adverse impacts and material impairment to historical resources through the loss of character-defining features and therefore historic integrity. Under CEQA, material impairment to historical resources

occurs when a historical resource no longer conveys the reasons for its significance due to alterations, incompatible changes, and/or the loss of character-defining features.

With the project highly conceptual at this stage, given the importance of the resource and the extent of the total renovation, this project component could cause a significant adverse impact to the Library, which is both a historic district contributor and individually eligible for landmark designation at the federal and state levels. Therefore, the impact would be **significant**.

Implementation of the proposed Master Plan could adversely affect the Library (Building 15), through physical changes and alterations to character-defining features and a potential loss of historic integrity. Implementation of MM-HBE-1 through MM-HBE-5 would lessen and avoid some significant adverse impacts to the Library. Following mitigation, impacts would still be significant unavoidable. (See Section 4.6.5, Mitigation Measures, for the full text of these mitigation measures.)

Arabian Horse Center Historic District

The eligible Arabian Horse Center Historic District consists of the buildings and structures that compose the W.K. Kellogg Arabian Horse Center, an important breeding and training program originally founded by W.K. Kellogg in 1926 and housed in the University Plaza (Building 26). The W.K. Kellogg Arabian Horse Center (Building 29), which is slated for renovation as part of the proposed Master Plan, is one of the five contributing resources to the historic district. At present, project plans have not yet been developed for the renovations. However, based on the Master Plan's range and extent of maintenance and seismic upgrades for identified historical resources, implementation of the proposed Master Plan could result in significant adverse impacts and material impairment to historical resources through the loss of character-defining features and therefore historic integrity. Under CEQA, material impairment to historical resources occurs when a historical resource no longer conveys the reasons for its significance due to alterations, incompatible changes, and/or the loss of character-defining features. Therefore, the impact would be **significant**.

Implementation of the proposed Master Plan would adversely affect the Arabian Horse Center Historic District, through physical changes and alterations to character-defining features and a potential loss of historic integrity. Mitigation Measures MM-HBE-1 through MM-HBE-5 would lessen and avoid some significant adverse impacts to the Arabian Horse Center Historic District. Following mitigation, impacts would still be significant and unavoidable. (See Section 4.6.5, Mitigation Measures, for the full text of these mitigation measures.)

4.6.4.2 Cumulative Impacts

Impact 4.6-2 The project could result in a cumulatively considerable contribution to significant cumulative impacts related to cultural resources. (Less than Significant)

Cumulative impacts to historical resources may occur if the proposed Master Plan and related projects cumulatively affect historical resources in the immediate vicinity, contribute to changes within the same historic eligible districts, involve resources that are examples of the same property type, or are significant within the same context as the historical resources within the proposed Master Plan. Although impacts to historical resources tend to be site specific, a significant cumulative impact could occur if the impact of the proposed Master Plan combined with related projects would result in material impairment to the historical resource. The past, present, and foreseeable future development projects anticipated to occur in the vicinity of the proposed Master Plan area include those off-campus cumulative projects listed in Section 4.0, Environmental Analysis, Table 4.0-1. These projects are outside the API boundaries, and

do not fall within the eligible historic districts identified in this section and the HRTR. These cumulative projects do not include historical resources that would be likely to contribute to the significance with any of the historical resources identified in this section and the HRTR (Appendix D-2). Therefore, cumulative impacts are not expected to result from proposed Master Plan implementation, and the impact would be **less than significant**.

4.6.5 Mitigation Measures

MM-HBE-1 Historic Preservation Input to Design Team. For proposed Master Plan projects involving a "major exterior alteration" to a historical resource, impacts to those historical resources shall be reduced through historic preservation input to the design team by a qualified historic preservation professional. For purposes of MM-HBE-1, "major exterior alterations" shall indicate changes to exterior character-defining features, or the setting of a building or structure determined to be a historical resource. Such projects might include, but not be limited to:

- Additions
- Adjacent new construction
- Partial or complete demolition
- Relocation
- The removal, replacement, obstruction, or destruction of character-defining features, including but not limited to windows (glazing and framing members), wall sheathing materials, architectural detailing and other features that characterize the historic property
- Changes to the roof shape, pitch, eaves, and other features
- Installment of wheelchair access ramps and other ADA-compliant features
- Changes to the overall design configuration and composition of the building and the spatial relationships that define it.

For purposes of MM-HBE-1, "minor exterior alterations" shall indicate a minor alteration/change to the exterior of a building or structure and its setting that would not be likely to significantly alter its appearance. Minor exterior alterations to historical resources are exempt from further review from an architectural historian. Such projects involving minor exterior alterations might include, but not be limited to:

- Repainting
- In-kind landscaping or hardscaping replacement
- Reversible installation of HVAC units that do not obstruct or destroy character-defining features
- Installation of fencing, signage, or artwork that does not obstruct or destroy character-defining features.

For major exterior alterations involving historical resources, the historic preservation professional shall work with the design team to plan and identify options for new construction, upgrades, stabilization, repairs, and rehabilitation that will facilitate compliance with the Secretary's Standards. This input to the design team shall begin in the earliest phases of the design phase (ideally during conceptual design) and extend throughout development of 50% Construction

Drawings. This input shall include but not be limited to a site walk with the design team, to gather information on project goals and constraints.

For new construction, the historic preservation professional shall work with the design team to identify options and opportunities for: (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, (2) ensuring that new construction, in materials, finishes, design, scale, and appearance, is compatible but differentiated from historic contributors and character-defining features; and (3) ensuring that new construction is designed and sited in such a way that it reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors.

For modernization and upgrade projects, the historic preservation professional shall work with the design team to identify project options that facilitate compliance with the Secretary's Standards. The historic preservation professional shall review proposed materials, finishes, window treatments/configuration, and other details to ensure compliance with the Secretary's Standards. The historic preservation professional shall provide specifications for architectural features or materials requiring restoration or removal, maintaining and protecting relevant features in place, or on-site storage. Specifications shall include detailed drawings or instructions where historic features may be impacted. The historic preservation professional shall document the input provided to the design team in Memoranda for the Record at the Schematic and 50% Construction Documents phases. The historic preservation professional shall participate in pre-construction and construction monitoring activities, as appropriate, to facilitate conformance with the Secretary's Standards and/or lessening of material impairment to historical resources.

Minimum qualifications standards for the historic preservation professional shall be as follows: the historic preservation professional shall satisfy the Secretary of the Interior's Professional Qualifications Standards for Architectural History and/or Historic Architecture as defined by the National Park Service and in accordance with 36 CFR 61 and possess a minimum of 10 years of project-level experience in designing, developing, and reviewing architectural plans for conformance with the Secretary's Standards.

MM-HBE-2 Character-Defining Features and Impacts Screening Memoranda. For projects affecting any eligible historic buildings identified in the 2025 Cal Poly Pomona Master Plan Historical Resources Technical Report or subsequently determined to qualify as a historical resource, Cal Poly Pomona shall implement the following procedures.

For major exterior alterations to eligible historic resources, Cal Poly Pomona shall retain a qualified historic preservation professional to prepare a Character-Defining Features and Impacts Screening Memorandum in coordination with the design team.

The objective shall be to document and consider project design features and/or measures that would lessen or avoid direct or indirect impacts to the historical resource. Conclusion of the screening consultation process shall be documented in a memorandum, including a statement of compliance with the Secretary's Standards. The purpose of the memorandum shall be to document avoidance/reduction of significant adverse impacts to historical resources, where feasible, through (1) identifying and documenting character-defining features, noncontributing elements/additions,

and (2) providing historic preservation project review and preliminary impacts analysis screening to Cal Poly Pomona as early as possible in the design process.

The memorandum shall include documentation of a review of preliminary and/or conceptual project objectives early in the design process and shall describe various project options capable of reducing and/or avoiding significant adverse direct or indirect impacts through compliance with the Secretary's Standards and/or application of the State Historic Building Code or any subsequent design guidelines prepared by Cal Poly Pomona for the treatment of historic resources.

If project details remain conceptual at the time of project review, the Character-Defining Features and Impacts Screening Memorandum shall include design recommendations drawn from the Secretary's Standards that would facilitate compliance and avoid, lessen, or mitigate significant adverse impacts to historical resources. In addition, the Secretary's Standards project review shall include a section assessing the potential direct and indirect impacts of the proposed project on the historical resource, whether an individual resource or historic district/cultural landscape.

Minimum qualifications standards for the preparer of the Character-Defining Features and Impacts Screening Memoranda shall be as follows: the historic preservation professional shall satisfy the Secretary of the Interior's Professional Qualifications Standards for History and/or Architectural History as defined by the National Park Service and in accordance with 36 CFR 61 and possess a minimum of ten (10) years of project-level experience in CEQA review of historic resources and reviewing architectural plans for conformance with the Secretary's Standards.

MM-HBE-3 Historical Resource Evaluation of Properties Not Previously Surveyed. For a building, structure, or designed landscape feature on the main campus that 1) is 45 years old or older at the time it is proposed for alteration, and 2) was not evaluated as part of the 2025 Cal Poly Pomona Master Plan Historical Resources Technical Report, before carrying out a "major exterior alteration," Cal Poly Pomona shall retain a qualified historic preservation professional to complete a focused Eligibility Screening Memo to determine the historical resource status of the property. The Eligibility Screening Memo shall gather the substantial evidence necessary to apply the relevant significance criteria and determine the status of the property; this evidence shall include but not necessarily be limited to property-specific research, brief biographical sketches of design professionals involved in its construction, and changes/additions over time. The historic context prepared in the 2025 Cal Poly Pomona Master Plan Historic Resources Technical Report will be utilized to the maximum extent practicable to streamline the effort. The Eligibility Screening Memo will draw on a desktop review of site photos provided by Cal Poly Pomona; no site visit will be required.

Properties appearing to meet eligibility criteria as a result of the Eligibility Screening Memo will be carried forward for intensive-level documentation in a due-diligence Historical Resource Evaluation Report (HRER). The HRER shall include an in-person site visit by a qualified preservation professional, during which the property's existing conditions, features, and alterations over time will be documented in detailed field notes and digital photographs. The evaluation shall consider buildings, structures, objects, sites, historic districts, and potential cultural landscapes and shall identify the character-defining features of such resources and other required information on the appropriate Department of Parks and Recreation (DPR) 523 Record Forms, which shall be appended to the evaluation.

The level of documentation for each evaluation shall comply with Public Resources Code Section 5024 and 5024.5 with respect to state-owned historical resources. For resources determined through this evaluation process to meet National Register of Historic Places/California Register of Historical Resources and/or California Historical Landmark criteria, MM-HBE-1 and MM-HBE-2 shall be required as early as possible in the project planning and design phase.

If the resource was the subject of a historic resources evaluation meeting the standards of Public Resources Code Section 5024 and 5024.5 within the last 5 years, MM-HBE-3 shall not be required; resources that are the subject of an evaluation older than 5 years may require re-evaluation.

For buildings, structures, objects, sites, historic districts, cultural landscapes, and other resources determined through this evaluation process not to meet National Register of Historic Places/California Register of Historical Resources and/or California Historical Landmark criteria, no further mitigation is required.

Minimum qualifications standards for the preparer of the Project-Specific Historical Resource Evaluation shall be as follows: the historic preservation professional shall satisfy the Secretary of the Interior's Professional Qualifications Standards for History and/or Architectural History as defined by the National Park Service and in accordance with 36 CFR 61 and possess a minimum of ten (10) years of project-level experience in California Environmental Quality Act review of historical resources and reviewing architectural plans for conformance with the Secretary's Standards.

MM-HBE-4 HABS-Like Documentation Package. If major exterior alterations, renovations, or relocation of a determined historic resource are proposed and the project does not comply with the Secretary's Standards, or in the event that preservation or reuse of a historical resource are not feasible, the historical building shall be documented in a Historic American Buildings Survey (HABS)-like documentation package. The HABS-like documentation of the building, structure, district, feature, and its associated landscaping and setting shall be commissioned prior to construction activities.

The HABS-like package will document in photographs and descriptive and historical narrative the historical resources slated for modification/demolition. Documentation prepared for the package will draw upon primary and secondary-source research and available studies previously prepared for the project. The specifications for the HABS-like package follow:

- **Photographs:** Photographic documentation will focus on the historical resources/features slated for demolition, with overview and context photographs for the campus and adjacent setting. Photographs will be taken of the building using a professional-quality single lens reflex (SLR) digital camera with a minimum resolution of 10 megapixels. Photographs will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be provided in electronic format.
- **Descriptive and Historical Narrative: The** architectural historian will prepare descriptive and historical narrative of the historical resources/features slated for demolition. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs, and information on how the resource fits within the broader campus during its period of significance. The historical narrative will include available information on the campus design, history, architect/contractor/designer as appropriate, area history, and historical context. In

addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate.

- Historic Documentation Package Submittal: The electronic package will be assembled by the architectural historian and submitted to Cal Poly Pomona for review and comment.
- A copy of the HABS-like package shall be offered to the Cal Poly Pomona Special Collections and Archives. The record shall be accompanied by a report containing site-specific history and appropriate contextual information. This information shall be gathered through site-specific and comparative archival research, and oral history collection as appropriate.

Minimum qualifications standards for the preparer of the HABS-like Documentation Package shall be as follows: the historic preservation professional shall satisfy the Secretary of the Interior's Professional Qualifications Standards for History and/or Architectural History as defined by the National Park Service and in accordance with 36 CFR 61 and possess a minimum of ten (10) years of project-level experience in CEQA review of historical resources and reviewing architectural plans for conformance with the Secretary's Standards.

MM-HBE-5 PRC-Required SHPO Consultation. For state-owned historical resources, PRC Sections 5024 and 5024.5 require State Historic Preservation Officer (SHPO) consultation for proposed projects that might impact historical resources eligible for the National Register of Historic Places, California Register of Historical Resources or as a California Historical Landmarks. These sections of the Public Resources Code are designed to give SHPO the opportunity to review and comment on historical resource determinations and proposed projects that might affect such historical resources.

Cal Poly Pomona shall consult with SHPO regarding the potential alteration or demolition of any buildings, structures, objects, sites, historic districts, cultural landscapes, or other campus features that appear eligible for listing in the National Register of Historic Places, the California Register of Historical Resources or as California Historical Landmarks, as documented through survey or evaluation. Such consultation shall be completed pursuant to California PRC Sections 5024 and 5024.5 and related guidance published by SHPO.

Retention of qualified historic preservation professional may be necessary to assist in SHPO consultation and to compile the required documentation and consultation materials in compliance with PRC Sections 5024 and 5024.5 and related guidance published by SHPO. This shall include a formal request for consultation, all required materials as specified in each mitigation measure, and any other background materials that might be requested by SHPO.

Minimum qualifications standards shall be as follows: the historic preservation professional shall satisfy the Secretary of the Interior's Professional Qualifications Standards for History and/or Architectural History as defined by the National Park Service and in accordance with 36 CFR 61 and possess a minimum of ten (10) years of project-level experience in CEQA review of historical resources and reviewing architectural plans for conformance with the Secretary's Standards.

4.6.6 Level of Significance After Mitigation

Implementation of MM-HBE-1, MM-HBE-2, MM-HBE-3, MM-HBE-4, and MM-HBE-5 would lessen, avoid, and partially mitigate potentially significant impacts on historical resources because actions would be taken to avoid, evaluate, document, consult, and otherwise treat the resource appropriately, in accordance with pertinent laws and regulations. However, CEQA Guidelines Section 15126.4(b)(2) notes that in some circumstances, documentation of a historical resource shall not mitigate the effects of demolition of that resource to less than significant because the historical resource would no longer exist. Therefore, because the potential for permanent loss of a historical resource or its integrity cannot be precluded, impacts to the eligible historical resources on the main campus through implementation of the proposed Master Plan would be **significant unavoidable**.

4.6.7 References

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4.7 Energy

The following analysis identifies potential impacts to energy resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing energy conditions in the proposed Master Plan area and vicinity, discusses the regulatory setting, evaluates potential impacts related to energy, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts. Energy calculations are provided in Appendix B.

No comments related to energy were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are provided in Appendix A.

4.7.1 Environmental Setting

4.7.1.1 Electricity

According to the U.S. Energy Information Administration, California used approximately 251,869,136 megawatt--hours of electricity in 2022 (EIA 2023a). Electricity usage in California for different land uses varies substantially based on the types of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. Based on California's electricity sales in 2023, the industrial sector accounted for 18%, the commercial sector accounted for 47%, and the residential sector accounted for 35% (EIA 2023a). California's electricity use per capita is lower than any other state except Hawaii (EIA 2023a).

Cal Poly Pomona is delivered electricity through a Direct Access program. Direct Access service is retail electric service where customers purchase electricity from a competitive provider called an Electric Service Provider (ESP), instead of from a regulated electric utility. The utility delivers the electricity that the customer purchases from the ESP to the customer over its distribution system (CPUC 2025a). Shell bEnergy, acting as the Electric Service Provider, provides the commodity of electricity to Cal Poly Pomona while Southern California Edison (SCE) delivers electricity to Cal Poly Pomona. SCE, a subsidiary of Edison International, serves approximately 180 cities in 11 counties across central and Southern California. According to the California Energy Commission (CEC), approximately 86 billion kilowatt-hours (kWh) of electricity were used in SCE's service area in 2022 (CEC 2023a).

Shell Energy receives electric power from a variety of sources. According to the 2023 Shell Energy Power Content Label, eligible renewable energy accounts for 33.3% of Shell Energy overall energy resources, with geothermal resources at 52.3%, wind power at 16.7%, eligible hydroelectric sources at 0.5%, and solar energy at 13.7.0% (CPUC 2025b). Within Los Angeles County, annual non-residential electricity use in 2022 was approximately 45 billion kWh per year, while residential electricity use is approximately 23 billion kWh per year (CEC 2023b).

4.7.1.2 Natural Gas

According to the U.S. Energy Information Administration, California used approximately 2,056,267 million cubic feet of natural gas in 2022 (EIA 2023b). The majority of California's natural gas customers are residential and small commercial customers (core customers). These core customers account for approximately 35% of the natural gas delivered by California utilities (CPUC 2021). Large consumers, such as electric generators and industrial customers (noncore customers), account for approximately 65% of the natural gas delivered by California utilities (CPUC 2021). The California Public Utilities Commission (CPUC) regulates California natural gas rates and natural gas services,

including in-state transportation over transmission and distribution pipeline systems, storage, procurement, metering, and billing. Most of the natural gas used in California comes from out-of-state natural gas basins. California gas utilities may soon also begin receiving biogas into their pipeline systems (CPUC 2022).

The Southern California Gas Company (SoCalGas) provides the region with natural gas service. SoCalGas' service territory encompasses approximately 20,000 square miles and more than 500 communities. In the California Energy Demand mid-energy demand scenario, natural gas demand is projected to have an annual growth rate of 0.03% in SoCalGas' service territory. Within Los Angeles County, annual natural gas consumption is approximately 2.8 billion therms (CEC 2023c) [1].

4.7.1.3 Petroleum

According to the U.S. Energy Information Administration, California used approximately 628 million barrels of petroleum in 2022, with the majority (534 million barrels) used for the transportation sector (EIA 2023c). There are 42 U.S. gallons in a barrel, so this equates to a total daily use of approximately 14.95 million gallons of petroleum among all sectors and 12.71 million gallons for the transportation sector. In California, petroleum fuels refined from crude oil are the dominant source of energy for transportation sources. Petroleum usage in California includes petroleum products such as motor gasoline, distillate fuel, liquefied petroleum gases, and jet fuel. California has implemented policies to improve vehicle efficiency and to support use of alternative transportation, which are described in Section 4.7.2, Regulatory Setting, as well as Section 4.8, Greenhouse Gas Emissions. California has led the United States in the most electric vehicles (EVs) and EV charging locations every year since 2016 (EIA 2023a).

4.7.2 Regulatory Setting

4.7.2.1 Federal

Federal Energy Policy and Conservation Act

In 1975, Congress enacted the Federal Energy Policy and Conservation Act (42 USC 6272–6273, 6294), which established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. In 2012, new fuel economy standards for passenger cars and light trucks were approved for model years 2017 through 2021 (77 FR 62624–63200). Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

Energy Policy Act of 2005

In January 2005 the Energy Policy Act (42 USC 15801) was signed into law. It addresses energy production in the United States, including energy efficiency; renewable energy; oil and gas; coal; tribal energy; nuclear matters and security; vehicles and motor fuels, including ethanol; hydrogen; electricity; energy tax incentives; hydropower and geothermal energy; and climate change technology. The Energy Policy Act provides loan guarantees for entities that develop or use innovative technologies that avoid the by-production of greenhouse gases (GHGs). Another provision of the Energy Policy Act is the Renewable Fuel Standard (RFS), which increases the amount of biofuel that must be mixed with gasoline sold in the United States.

[1] One cubic foot of natural gas has approximately 1,020 BTUs of natural gas or 1.02 kBTUs of natural gas.

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) (42 USC 152) was signed into law. In addition to setting increased corporate average fuel economy standards for motor vehicles, the EISA includes the following other provisions related to energy efficiency:

- Renewable Fuel Standard (Section 202)
- Appliance and lighting efficiency standards (Sections 301–325)
- Building energy efficiency (Sections 411–441)

The RFS, a federal law, requires ever-increasing levels of renewable fuels to replace petroleum (EPA 2022). The U.S. Environmental Protection Agency (EPA) is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains a minimum volume of renewable fuel. RFS program regulations were developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

The RFS program was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the United States. As required under the act, the original RFS program (RFS1) required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the EISA, the RFS program was expanded in several keyv ways that laid the foundation for achieving significant reductions of GHG emissions through the use of renewable fuels, for reducing imported petroleum, and for encouraging the development and expansion of our nation's renewable fuels sector. The updated program ("RFS2") includes the following:

- EISA expanded the RFS program to include diesel, in addition to gasoline.
- EISA increased the volume of renewable fuel required to be blended into transportation fuel from 9 billion gallons in 2008 to 36 billion gallons by 2022.
- EISA established new categories of renewable fuel and set separate volume requirements for each one.
- EISA required EPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."

Transportation Equity Act for the 21st Century

The Transportation Equity Act for the 21st Century was signed into law in 1998 and builds on the initiatives established in the Intermodal Surface Transportation Efficiency Act legislation. The Transportation Equity Act authorizes highway, highway safety, transit, and other efficient surface transportation programs. The act continues the program structure established for highways and transit under Intermodal Surface Transportation Efficiency Act, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of transportation decisions. The Transportation Equity Act also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of intelligent transportation systems to help improve operations and management of transportation systems and vehicle safety.

Infrastructure Investment and Jobs Act

The Infrastructure Investment and Jobs Act (Infrastructure Deal) was signed into law November 15, 2021. The legislation includes $39 billion of new investment to modernize transit, in addition to continuing the existing transit programs for 5 years as part of surface transportation reauthorization. The Infrastructure Deal would also invest $7.5 billion to build out a national network of electric vehicle (EV) chargers. The Infrastructure Deal would provide funding for deployment of EV chargers along highway corridors to facilitate long-distance travel and within communities to provide convenient charging where people live, work, and shop to support a goal of building a nationwide network of 500,000 EV chargers. This would accelerate the adoption of EVs, which would help reduce emissions and improve air quality. In addition, the Infrastructure Deal would include more than $65 billion in investments in clean energy transmission including upgrading existing power infrastructure through expanding transmission lines to facilitate the expansion of renewables and clean energy.

The Inflation Reduction Act of 2022

The Inflation Reduction Act was signed into law by President Biden in August 2022. The act includes specific investment in energy and climate reform and is projected to reduce GHG emissions within the United States by 40% as compared to 2005 levels by 2030. The act allocates funds to boost renewable energy infrastructure (e.g., solar panels and wind turbines), includes tax credits for the purchase of electric vehicles, and includes measures that will make homes more energy efficient.

4.7.2.2 State

Warren-Alquist Act

The California Legislature passed the Warren–Alquist Act in 1974 (California Public Resources Code, Section 25001), which created the California Energy Commission (CEC). The legislation also incorporated the following three key provisions designed to address the demand side of the energy equation:

- It directed the CEC to formulate and adopt the nation's first energy conservation standards for both buildings constructed and appliances sold in California.
- The act removed the responsibility of electricity demand forecasting from the utilities, which had a financial interest in high-demand projections, and transferred it to a more impartial CEC.
- The CEC was directed to embark on an ambitious research and development program, with a particular focus on fostering what were characterized as non-conventional energy sources.

State of California Energy Action Plan

The CEC and the CPUC approved the first State of California Energy Action Plan in 2003. The plan established shared goals and specific actions to ensure the provision of adequate, reliable, and reasonably priced electrical power and natural gas supplies; it also identified cost-effective and environmentally sound energy policies, strategies, and actions for California's consumers and taxpayers. In 2005, the CEC and CPUC adopted a second Energy Action Plan to reflect various policy changes and actions of the prior 2 years.

At the beginning of 2008, the CEC and the CPUC determined that it was not necessary or productive to prepare a new energy action plan. This determination was based, in part, on a finding that the state's energy policies have been significantly influenced by the passage of Assembly Bill (AB) 32 (California Public Resources Code, Sections

25310 and 25943[f]), the California Global Warming Solutions Act of 2006 (discussed below). Rather than produce a new energy action plan, the CEC and CPUC prepared an "update" that examines the state's ongoing actions in the context of global climate change.

Assembly Bill 32

The California legislature enacted AB 32, the California Global Warming Solutions Act of 2006 (California Health and Safety Code Sections 38500–38599). AB 32 provided initial direction on creating a comprehensive multiyear program to limit California's GHG emissions at 1990 levels by 2020, and initiate the transformations required to achieve the state's long-range climate objectives. A full discussion of AB32 and subsequent climate change legislation can be found in Section 4.9 Greenhouse Gas Emissions.

Assembly Bill 1007

AB 1007 (2005) required CEC to prepare a statewide plan to increase the use of alternative fuels in California (State Alternative Fuels Plan) (California Labor Code, Section 144.9). CEC prepared the plan in partnership with the California Air Resources Board (CARB) and in consultation with other state agencies, plus federal and local agencies. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

California Code of Regulations, Title 24, Part 6

The California Building Standards Code was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established Building Energy Efficiency Standards that are designed to ensure that new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every 3 years by the Building Standards Commission and CEC and revised if necessary (California Public Resources Code Section 25402[b][1]). The regulations receive input from members of industry, as well as the public, to "reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (California Public Resources Code Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California Public Resources Code Section 25402[d]) and cost effectiveness (California Public Resources Code Section 25402[b][2–3]). As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The current Title 24, Part 6 standards, referred to as the 2022 Title 24 Building Energy Efficiency Standards, became effective on January 1, 2023. The 2022 energy code focuses on four key areas in newly constructed homes and businesses quality (CEC 2021):

- Encouraging electric heat pump technology for space and water heating, which consumes less energy and produces fewer emissions than gas-fired units.
- Establishing electric-ready requirements for single-family homes to position owners to use cleaner electric heating, cooking, and EV charging options whenever they choose to adopt those technologies.
- Expanding solar photovoltaic (PV) system and battery storage standards to make clean energy available on site and complement the state's progress toward a 100% clean electricity grid.

- Strengthening ventilation standards to improve indoor air quality.

California Code of Regulations, Title 24, Part 11

In addition to CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24), which is commonly referred to as CALGreen, establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. CALGreen took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial, low-rise residential and state-owned buildings and schools and hospitals.

The 2022 CALGreen standards are the current applicable standards. For residential projects, some of the key mandatory CALGreen standards involve requirements related to EV parking spaces and charging infrastructure, indoor and outdoor water efficiency and conservation, construction waste management, low volatile organic compound paints and finishes, and formaldehyde limits in wood products (24 CCR, Part 11). For nonresidential projects, some of the key mandatory CALGreen standards involve requirements related to bicycle parking, designated parking for clean air vehicles, EV charging stations for passenger vehicles, shade trees, water conserving plumbing fixtures and fittings, outdoor potable water use in landscaped areas, recycled water supply systems, construction waste management, excavated soil and land clearing debris, and commissioning (24 CCR, Part 11).

California Code of Regulations, Title 20

Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency (20 CCR 1401–1410). CEC certifies an appliance based on a manufacturer's demonstration that the appliance meets the standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwashers; clothes washers and dryers; cooking products; electric motors; low voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing each type of appliance covered under the regulations and appliances must meet the standards for energy performance, energy design, water performance, and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

Renewables Portfolio Standard Program

Senate Bill (SB) 1078 (2002) (California Public Utilities Code Section 399.11 et seq.) established the Renewables Portfolio Standard (RPS) program, which required an annual increase in renewable generation by the utilities equivalent to at least 1% of sales, with an aggregate goal of 20% by 2017. This goal was subsequently accelerated, requiring utilities to obtain 20% of their power from renewable sources by 2010 (see SB 1078, Executive Order [EO] S-14-08, and EO S-21-09).

SB 1368 (2006) required CEC to develop and adopt regulations for GHG emission performance standards for the long-term procurement of electricity by local publicly owned utilities (California Public Utilities Code Section 8340-8341). These standards must be consistent with the standards adopted by CPUC.

EO S-14-08 (2008) focused on the contribution of renewable energy sources to meet the electrical needs of California while reducing the GHG emissions from the electrical sector. This EO required that all retail suppliers of electricity in California serve 33% of their load with renewable energy by 2020. Furthermore, the EO directed state agencies to take appropriate actions to facilitate reaching this target. California Natural Resources Agency, in collaboration with CEC and the California Department of Fish and Wildlife, was directed to lead this effort.

EO S-21-09 (2009) directed CARB to adopt a regulation consistent with the goal of EO S-14-08 by July 31, 2010. CARB was further directed to work with CPUC and CEC to ensure that the regulation builds upon the RPS program and was applicable to investor-owned utilities, publicly owned utilities, direct access providers, and community choice providers. Under this order, CARB was to give the highest priority to those renewable resources that provide the greatest environmental benefits with the least environmental costs and impacts on public health, as well as those that can be developed the most quickly in support of reliable, efficient, cost-effective electricity system operations. On September 23, 2010, CARB initially approved regulations to implement a Renewable Electricity Standard; however, this regulation was not finalized because of subsequent legislation (SB X1-2) signed by Governor Brown in April 2011 (California Public Resources Code, Section 25354[l]).

SB X1-2 (April 2011) expanded RPS by establishing a renewable energy target of 20% of the total electricity sold to retail customers in California per year by December 31, 2013, and 33% by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation (30 megawatts or less), digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current and that meets other specified requirements with respect to its location. SB X1-2 applies to all electricity retailers in the state, including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. All these entities must meet the renewable energy goals listed above.

SB 350 (2015) further expanded the RPS program by establishing a goal of 50% of the total electricity sold to retail customers in California per year by December 31, 2030 (California Public Utilities Code, Section 454.51). In addition, SB 350 included the goal to double the energy efficiency savings in electricity and natural gas final end uses (such as heating, cooling, lighting, or class of energy uses on which an energy-efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also requires CPUC, in consultation with CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal.

SB 100 (2018) increased the standards set forth in SB 350, establishing that 44% of the total electricity sold to retail customers in California per year by December 31, 2024; 52% by December 31, 2027; and 60% by December 31, 2030, be secured from qualifying renewable energy sources (California Public Utilities Code, Sections 399.11, 399.15, 399.30). SB 100 states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California. This bill requires that the achievement of 100% zero-carbon electricity resources does not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

SB 1020 (September 2022) revises the standards from SB 100, requiring the following percentage of retail sales of electricity to California end-use customers to come from eligible renewable energy resources and zero-carbon resources: 90% by December 31, 2035; 95% by December 31, 2040; and 100% by December 31, 2045 (California Government Code, Section 7921.505; California Health and Safety Code, Section 38561; California Public Utilities Code, Sections 454.53, 583, 454.59, and 739.13).

State Vehicle Standards (Assembly Bill 1493 and Executive Order B-16-12)

AB 1493 (July 2002) was enacted in response to the transportation sector accounting for a large share of California's carbon dioxide (CO_2) emissions (California Health and Safety Code, Section 43018.5). AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the state. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004.

EO B-16-12 (March 2012) required that state entities under the governor's direction and control support and facilitate the rapid commercialization of zero-emissions vehicles (ZEVs). It ordered CARB, CEC, CPUC, and other relevant agencies to work with the Plug-In Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to help achieve benchmark goals by 2015, 2020, and 2025. On a statewide basis, EO B1612 identified a target reduction of GHG emissions from the transportation sector equaling 80% less than 1990 levels by 2050. This directive did not apply to vehicles that have special performance requirements necessary for the protection of public safety and welfare.

EPA and National Highway Traffic Safety Administration approved the SAFE Vehicles Rule Part One and Two, which revoked California's authority to set its own GHG emissions standards and set ZEV mandates in California. However, in March 2022, EPA reinstated California's authority under the Clean Air Act to implement its own GHG emission standards and ZEV sales mandate. EPA's action concludes its reconsideration of the 2019 SAFE-1 rule by finding that the actions taken under the previous administration as a part of SAFE-1 were decided in error and are now entirely rescinded.

Senate Bill 375

SB 375 (California Government Code Section 65080) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 requires CARB to adopt regional GHG--reduction targets for the automobile and light-truck sector for 2020 and 2035 and to update those targets every 8 years. SB 375 requires the state's 18 regional metropolitan planning organizations to prepare a sustainable communities strategy as part of their regional transportation plan that will achieve the GHG-reduction targets set by CARB. If a metropolitan planning organization is unable to devise a sustainable communities strategy to achieve the GHG-reduction target, the metropolitan planning organization must prepare an alternative planning strategy demonstrating how the GHG-reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

A sustainable communities strategy does not (1) regulate the use of land; (2) supersede the land use authority of cities and counties; or (3) require that a city's or county's land use policies and regulations, including those in a general plan, be consistent with it (California Government Code Section 65080[b][2][K]). Nonetheless, SB 375 makes regional and local planning agencies responsible for developing those strategies as part of the federally required metropolitan transportation planning process and the state-mandated housing element process.

Advanced Clean Cars Program and Zero-Emissions Vehicle Program

The Advanced Clean Cars (ACC) I program (CARB 2012) is an emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package of regulations: the low-emission vehicle regulation for criteria air pollutant and GHG emissions and a technology forcing regulation for ZEVs that contributes to both types of emission reductions (CARB 2012). The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars. To improve air quality, CARB has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that in 2025 model cars will emit 75% less smog-forming pollution than the average new car sold in 2015. The ZEV program will act as the focused technology of the ACC I program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid EVs in the 2018 to 2025 model years.

The ACC II program, which was adopted in August 2022, established the next set of low-emission vehicle and ZEV requirements for model years after 2025 to contribute to meeting federal ambient air quality ozone standards and California's carbon neutrality standards (CARB 2022). The main objectives of ACC II are as follows:

- Maximize criteria and GHG emission reductions through increased stringency and real-world reductions.
- Accelerate the transition to ZEVs through both increased stringency of requirements and associated actions to support wide-scale adoption and use.

The ACC II rulemaking package also considers technological feasibility, environmental impacts, equity, economic impacts, and consumer impacts.

Executive Order N-79-20

EO N-79-20 (September 2020) requires CARB to develop regulations as follows: (1) Passenger vehicle and truck regulations requiring increasing volumes of new ZEVs sold in the state towards the target of 100% of in-state sales by 2035; (2) medium- and heavy-duty vehicle regulations requiring increasing volumes of new zero–emission trucks and buses sold and operated in the state towards the target of 100% of the fleet transitioning to ZEVs by 2045 everywhere feasible and for all drayage trucks to be zero emission by 2035; and (3) strategies, in coordination with other state agencies, EPA, and local air districts, to achieve 100% zero emissions from off-road vehicles and equipment operations in the state by 2035. EO N-79-20 called for the development of a ZEV Market Development Strategy, adopted by the California Governor's Office of Business and Economic Development, which was released February 2021, to be updated every 3 years, that ensures coordination and implementation of the EO and outlines actions to support new and used ZEV markets. In addition, the EO specifies identification of near-term actions and investment strategies to improve clean transportation, sustainable freight, and transit options and calls for development of strategies, recommendations, and actions by July 15, 2021, to manage and expedite the responsible closure and remediation of former oil extraction sites as the state transitions to a carbon-neutral economy.

California State University

CSU Sustainability Policy

CSU has identified sustainability as a system-wide priority, as detailed in the CSU Sustainability Policy, which was adopted in 2014 and was last updated in 2024. The CSU Sustainability Policy focuses mainly on energy and GHG emissions and largely aligns with the State of California's energy and GHG emissions reduction goals (CSU 2024). The policy aims to

reduce the environmental impact of construction and operation of buildings and to integrate sustainability across the curriculum. Table 4.7-1 includes a summary of the CSU Sustainability Policy and associated goals.

Table 4.7-1 CSU Sustainability Policy

University Sustainability	
1.	The CSU will develop employee and student workforce skills in the green jobs industry, promote the development of sustainable products and services, and foster economic development.
2.	The CSU will seek to further integrate sustainability into the academic curriculum.
3.	The CSU will pursue sustainable practices in all areas of the university.
4.	Each CSU is encouraged to designate a sustainability officer responsible for campus sustainability programs.
Climate Action Plan	
1.	The CSU will strive to reduce systemwide facility greenhouse gas (GHG) emissions to 40% below 1990 levels consistent with AB 32, California's Global Warming Solutions Act of 2006.
2.	The CSU will strive to reduce facility GHG emissions to 80% below 1990 levels by 2040, and achieve carbon neutrality by 2045 in accordance with Statewide mandates.
3.	The CSU will encourage and promote the use of alternative transportation and/or alternative fuels.
Energy Resilience and Procurement	
1.	The CSU shall pursue energy procurement and production. The CSU shall endeavor to increase its self-generated energy capacity from 32 to 80 megawatts (MW) by 2030.
2.	The CSU will consider cost effective opportunities to exceed the State of California and CPUC Renewable Portfolio Standard (RPS) sooner than the established goal of procuring 60% of its electricity needs from renewable sources by 2030 consistent with SB 100.
3.	The CSU will endeavor to exceed the State of California and CPUC RPS sooner than the established goal of procuring 60% of its electricity needs from renewable sources by 2030 consistent with SB 100.
4.	Campuses will transition from fossil-fuel sourced equipment to electric equipment as replacements or renovations are needed. Any in-kind fossil-fuel sourced equipment will be justified through an analysis which demonstrates why that solution represents the most cost-effective option and what alternatives were analyzed for comparative purposes. No new investment in, or renewal of, natural gas assets or infrastructure as part of campus projects starting July 1, 2035, with the exception of critical academic program needs.
Energy Conservation and Utility Management	
1.	All CSU buildings and facilities will be operated in the most energy efficient manner.
2.	All CSU campuses will continue to identify energy efficiency improvement measures to the greatest extent possible.
3.	The CSU will cooperate with federal, state, and local governments and other appropriate organizations in accomplishing energy conservation and utilities management objectives throughout the state.
4.	Each CSU campus will designate an energy/utilities manager with the responsibility and the authority for carrying out energy conservation and utilities management programs.
5.	The CSU will monitor monthly energy and utility usage on all campuses and will prepare a systemwide annual report on energy utilization and GHG emissions.
6.	Each CSU campus is encouraged to develop and maintain an integrated strategic energy resource plan.
Water Conservation	
1.	All CSU campuses will pursue water resource conservation to reduce water consumption by 10% by 2030 consistent by AB 1668, including such steps to develop sustainable landscaping, reduce turf, install controls to optimize irrigation water use, reduce water usage in restrooms and showers, and promote the use of reclaimed/recycled water.
Waste Management	
1.	Campuses shall seek to reduce the rate of landfill bound waste to 50% of total campus waste by 2030, divert at least 80% by 2040, and move toward zero waste.

Table 4.7-1 CSU Sustainability Policy

2.	The CSU will encourage the reduction of hazardous waste while supporting the academic program.
Sustainable Procurement	
1.	Campuses will promote use of suppliers and/or vendors who reduce waste and re-purpose recycled material.
2.	Campus practices should encourage use of products that minimize waste sent to landfills or incinerators, participate in the CalRecycle Buy-Recycled program or equivalent, and increase recycled content purchases in all Buy-Recycled program product categories.
3.	Campuses shall continue to report on and track all recycled content product categories.
4.	Campuses shall align procedures with state initiatives to report environmental product declarations for select construction materials.
5.	Promote circular economies by seeking to reduce waste when considering materials purchases such as office/classroom supplies or equipment by minimizing purchase of items with a short useful life, are unable to be recycled, and/or are made of unsustainable or carbon intensive materials.
Sustainable Food Service	
1.	Campuses shall strive to increase their sustainable food purchases to 20% of total food budget by 2020.
2.	Campuses shall collaborate to provide information and/or training on sustainable food service operations.
Sustainable Building Practices	
1.	All future CSU new construction, remodeling, renovation, and repair projects will be designed with consideration of optimum energy utilization, low life cycle operating costs, and compliance with all applicable energy regulations.
2.	Capital Planning, Design and Construction in the Chancellor's Office shall monitor building sustainability/energy performance, based on Leadership in Energy and Environmental Design (LEED) principles.
3.	Existing building energy performance will be optimized through improved operation, maintenance and repair, and capital improvement, enabling campuses to meet carbon reduction goals.
4.	The CSU shall design and build all new buildings and major renovations to meet or exceed the minimum requirements equivalent to LEED "Silver."
Physical Plant Management	
1.	Each campus shall operate and maintain a comprehensive energy management system.
2.	Campus energy/utilities managers will make the necessary arrangements to achieve optimum efficiency in the use of natural gas, electricity, or any other purchased energy resources to meet the heating, cooling, and lighting needs of facilities, striving to adhere to Statewide energy efficiency guidance regarding appropriate indoor temperature setpoints. Simultaneous heating and cooling operations to maintain specific temperatures in work areas will not be allowed unless special operating conditions dictate them.
3.	To the extent possible, programs will be consolidated to achieve the highest building utilization.
4.	All CSU campuses will implement a utilities chargeback system to recover direct and indirect costs of utilities.
Transportation	
1.	The CSU will encourage and promote the use of alternative transportation and/or alternative fuels for university-associated transportation, including commuter and business travel.
2.	CSU campuses shall develop and maintain a transportation demand management (TDM) plan, updated every five years, to reduce Vehicle Miles Traveled (VMT) and carbon emissions.
3.	Campuses shall strive to increase EV, e-bike, and other electric mobility and transportation device charging infrastructure and incentive programs.
4.	Campuses shall strive to develop and maintain a long-range plan for transitioning fleet and ground equipment to zero emissions. 50% of all light duty vehicle purchases will be ZEV by 2025, with no addition of gas-powered light duty vehicles to the fleet after 2035. All small off-road engine equipment used for campus grounds will be electric by 2035. All buses and heavy-duty vehicles will be ZEV by 2045.

Source: CSU 2024.

Under the CSU Sustainability Policy, campuses are responsible for quantifying and reducing their Scope 1 and 2 emissions to reach the 2040 and 2045 goals. Scope 1 emissions are direct emissions (e.g., combustion of fossil fuels, fleet vehicles, agriculture operations, use of refrigerants). Scope 2 emissions are emissions from purchased utilities (e.g., electricity, water).

Executive Order 987

CSU Executive Order 987 is the CSU Policy Statement on Energy Conservation, Sustainable Building Practices, and Physical Plant Management. Cal Poly Pomona operates under this executive order, which sets minimum efficiency standards for new construction and renovations, and establishes operating practices intended to ensure CSU buildings are used in the most energy efficient and sustainable manner possible while still meeting the programmatic needs of the University.

Cal Poly Pomona Climate Action Plan

The Cal Poly Pomona Climate Action Plan (CAP) guides the University's efforts to reach carbon neutrality. It provides targets for achieving climate neutrality by 2030 through a combination of local and off-site actions and specifies a process for making progress toward that goal (Cal Poly Pomona 2009). Key targets and strategies of the plan that are relevant to the analysis in this section include the following:

1. Reduce GHG Emissions Associated with Travel
    a. Aggressive Carpooling Program – Increase total % of carpoolers across all sectors
    b. Mass Transit Program – Increase total % of transit riders across all sectors
    c. University Fleet Improvements - Eliminate gas-powered and conventional diesel vehicles, in favor of increases in electric, natural gas and biodiesel
    d. University Air Travel – Offset 25% of University-sponsored faculty/staff/student/administrator air travel
2. Reduce Trips/Vehicle Miles Traveled (VMT)
    a. Increase on-campus residential population
    b. Increase near-campus housing for faculty/staff
    c. Increase online/hybrid course offerings and efficient scheduling to reduce student trips to campus
    d. Faculty/Staff alternative scheduling
3. Reduce Energy Demand on Campus
    a. Renovate 25% existing campus square footage and/or exterior lighting to reduce energy consumption
    b. Increase energy efficiency/mitigation in new buildings
    c. Implement behavioral programs, energy star purchasing and plug load management to reduce electricity demand
    d. Space use efficiency program – Reduce the need to add new buildings through more efficient space use and building renovation for flexibility
4. Change Energy Mix to Reduce Greenhouse Gas Emissions
    a. Reduce Natural Gas usage by 6.25% through on-site solar thermal

b. GHG Free sources constitute 33% of electricity purchases via on-site production, agreements or renewable energy credits (RECs)

5. Agricultural/Landscape Operations and Solid Waste
    a. Reduce Solid Waste by 50% through aggressive recycling/awareness programs
    b. Practice Conservation Tillage on 25% of agricultural land
    c. Reduce synthetic fertilizer usage by 33%; replace with aggressive composting program to increase organic fertilizer by 33%
    d. Increase Carbon Sequestration on campus by 50%

4.7.3 Threshold of Significance and Methodology

4.7.3.1 Threshold of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines §15064.7). The significance criteria used to evaluate proposed Master Plan impacts to energy are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to energy would occur if the proposed Master Plan would:

1. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

4.7.3.2 Methodology

CalEEMod Version 2022.1.1.26 (CAPCOA 2022) was used to estimate the proposed Master Plan's energy consumption during construction and operation. Construction of the proposed Master Plan would result in petroleum consumption primarily associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. All details specific to construction and operation are discussed in Section 4.3, Air Quality, specifically in the Methodology section (Construction Emissions and Operational Emissions), and are also applicable for the estimation of construction-related energy consumption. Potential energy consumption from proposed Master Plan operations were estimated for area sources (landscape maintenance equipment), energy sources (natural gas and electricity), mobile sources, solid waste, and water supply and wastewater treatment.

4.7.4 Impact Analysis

4.7.4.1 Project Impacts

Impact 4.7-1 **The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. (Less than Significant)**

Program-Level Analysis for Master Plan

Electricity

Construction. Temporary electric power for lighting, heating/cooling, and electronic equipment, such as computers inside temporary construction trailers, as well as lighting for construction activities, would be required during short-term construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. All sources of electricity would be obtained from existing power lines that serve the proposed Master Plan area, and no new infrastructure would be required during construction. There is nothing unusual about proposed Master Plan construction activities that would result in a wasteful, inefficient, and unnecessary use of electrical energy. The electricity used for construction activities would be temporary and would have a negligible contribution to the proposed Master Plan's overall energy consumption. Impacts of the proposed Master Plan related to electricity during construction would be **less than significant**.

Operations. Proposed Master Plan operations would require electricity for multiple purposes including building heating and cooling, lighting, appliances, electronics, and water and wastewater conveyance. As discussed in Section 4.3, Air Quality, under Methodology (Operational Emissions), CalEEMod default values for electricity consumption for the proposed Master Plan's land uses (i.e., college and residences) were utilized. For comparison purposes, the electricity demand for the existing, operational land uses is also provided in Table 4.7-2, resulting in the anticipated net electricity demand for the proposed Master Plan.

Table 4.7-2. Operational Net Electricity Demand

Land Use	kWh/Year
Existing Operational Land Uses	
College	54,159,570
Residences	14,403,062
Total Electrical Demand for Existing Land Uses	68,562,632
Master Plan Land Uses	
College	56,975,864
Residences	18,728,746
Total Electrical Demand for Master Plan	75,704,610
Net Electrical Demand for the Master Plan	7,141,978

Source: Appendix B.
Note: kWh = kilowatt-hour.

As shown in Table 4.7-2, the proposed Master Plan's net electrical demand is anticipated to be 7,141,978 kWh/year (or 7.1 million kWh per year) after subtracting the electrical demand from existing buildings. As previously discussed, Los Angeles County's annual electricity use was approximately 86 billion kWh in 2022. Therefore, the proposed Master Plan's electrical consumption would be a small percentage (0.0083%) of the County's current annual use.

In addition, the proposed Master Plan would be built in accordance with the current Building Energy Efficiency Standards (Title 24) in effect at the time of construction, which include robust requirements for energy efficiency. The provisions of the CALGreen building code apply to the planning, design, operation, construction, use and

occupancy of every newly constructed building or structure in the state. In mixed occupancy buildings, such as buildings that would result from the proposed Master Plan, each portion of a building must comply with the green building measures applicable to each specific occupancy. In accordance with the 2024 CSU Sustainability Policy (see Table 4.7-1), all new buildings and major building renovations would be designed and built to meet or exceed the minimum requirements equivalent to Leadership in Energy and Environmental Design (LEED) Silver. Therefore, due to the inherent increase in efficiency of building code regulations and compliance with the 2024 CSU Sustainability Policy, the proposed Master Plan would not result in a wasteful, inefficient, or unnecessary use of energy. Impacts of the proposed Master Plan related to operational electricity use would be **less than significant**.

Natural Gas

Construction. Natural gas is not anticipated to be required during construction of the proposed Master Plan. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the "petroleum" subsection. Any minor amounts of natural gas that may be consumed as a result of proposed Master Plan construction would be substantially less than that required for the Master Plan operation and would have a negligible contribution to the proposed Master Plan's overall energy consumption. Impacts of the proposed Master Plan related to natural gas usage during construction would be **less than significant**.

Operations. Natural gas consumption during proposed Master Plan operation would be required for various purposes, including building and pool heating. As discussed in Section 4.3, Air Quality, under Methodology (Operational Emissions), default natural gas generation rates in CalEEMod were used for the existing operational uses on site and for the proposed Master Plan. Table 4.7-3 presents the net natural gas demand for the proposed Master Plan.

Table 4.7-3. Operational Net Natural Gas Demand

Land Use	kBTU/Year
Existing Land Uses	
College	240,842,753
Residences	43,648,786
Total Natural Gas Demand for Existing Land Uses	*284,491,539*
Master Plan Land Uses	
College	253,366,558
Residences	56,744,860
Total Natural Gas Demand for Master Plan	*310,111,418*
Net Natural Gas Consumption	**25,619,879**

Source: Appendix B.
Note: kBTU = thousand British thermal units.

As shown in Table 4.7-3, the net demand for natural gas from the proposed Master Plan would be approximately 225,619,879 kBTU per year. As previously discussed, the County's annual natural gas consumption is estimated to be 2.8 billion therms per year. Therefore, the proposed Master Plan's estimated net increase in natural gas consumption of 4,293,911 kBTU (or 42,939 therms) per year would be a small percentage (0.0089%) of SoCalGas' annual supply to County customers. In addition, the proposed Master Plan is subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Title 24, Part 11, contains energy efficiency measures that are applicable to the individual projects under the proposed Master Plan including the use

of energy efficient electrical appliances, solar ready or solar photovoltaic systems and battery storage and building envelope requirements that minimize heat loss, decreasing the demand for space heating from natural gas. The proposed Master Plan would be required to meet Title 24 requirements applicable at that time, as required by state regulations through the plan review process. Additionally, the increase in natural gas usage would be minimized with compliance with the CSU Sustainability Policy, which indicates that no new investment in, or renewal of, natural gas assets or infrastructure would be pursued as part of campus projects starting July 1, 2035, with the exception of critical academic program needs (see Table 4.7-1). Therefore, due to the inherent increase in efficiency of building code regulations and compliance with CSU Sustainability Policy, the proposed Master Plan would not result in a wasteful, inefficient, or unnecessary use of natural gas. Impacts of the proposed Master Plan related to operational natural gas use would be **less than significant**.

Petroleum

Construction. Petroleum would be consumed throughout construction of the proposed Master Plan. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction, and VMT associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty construction equipment associated with construction activities, vendor trucks, and haul trucks would rely on diesel fuel. Construction workers would travel to and from the Master Plan area throughout the duration of construction. It was assumed that construction workers would travel in gasoline-powered vehicles.

Fuel consumption from construction equipment was estimated by converting the total CO_2 emissions from each construction phase to gallons using conversion factors for CO_2 to gallons of gasoline or diesel. The conversion factor for gasoline is 8.78 kilograms per metric ton CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO_2 per gallon (The Climate Registry 2024). The estimated diesel fuel use from construction equipment is shown in Table 4.7-4.

Table 4.7-4. Total Master Plan Construction Petroleum Demand (Gallons)

Off-Road Equipment (diesel)	Haul Trucks (diesel)	Vendor Trucks (diesel)	Worker Vehicles (gasoline)
Gallons			
615,475	87,199	529,058	682,523

Source: See Appendix B for outputs.
Notes: Fuel consumption from worker and vendor truck trips was estimated by converting the total CO_2 emissions from the construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Worker vehicles are assumed to be gasoline fueled, whereas vendor and haul trucks are assumed to be diesel fueled.

In summary, construction associated with the proposed Master Plan over the construction period is conservatively anticipated to consume 1,231,732 gallons of diesel from off-road equipment, haul trucks, and vendor trucks, and 682,523 gallons of gasoline from worker vehicles over the 15-year buildout period. The proposed Master Plan would be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation does the following: (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts adding older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best

Achievable Control Technology requirements. Overall, the proposed Master Plan would not be unusual when compared to local and regional demand for other energy resources and would not involve characteristics that require equipment that would be less energy-efficient than at comparable construction sites in the region or state. Therefore, construction impacts of the proposed Master Plan related to petroleum usage would be **less than significant**.

Operations. The fuel consumption resulting from the proposed Master Plan's operational phase would be attributable to various vehicles associated with each land use. Petroleum fuel consumption associated with motor vehicles traveling within the area during operation is a function of VMT. Trip generation rates for the proposed Master Plan and existing operational uses were based on the transportation analysis and data prepared for the proposed Master Plan (see Section 4.17, Transportation and Appendix J). The net estimated fuel use from existing and proposed Master Plan land uses operational mobile sources is shown in Table 4.7-5.

Table 4.7-5. Operational Net Mobile Source Petroleum Demand (Annual)

Fuel	Vehicle MT CO_2	kg/CO_2/Gallon	Gallons
Existing Land Uses			
Gasoline	46.835.54	8.78	5,334,343
Diesel	1954,59	10.21	191,438
	Total Petroleum Demand for Existing Land Uses		*5,525,782*
Master Plan Land Uses			
Gasoline	44,060.66	8.78	5,018,299
Diesel[1]	1,848.72	10.21	181,069
	Total Petroleum Demand for the Master Plan		*5,199,368*
		Net Total	**-326,415**

Source: Trips and vehicle CO_2 (Appendix B); kg/CO_2/Gallon (The Climate Registry 2024).
Note: MT = metric ton; CO2 = carbon dioxide; kg = kilogram.
[1] Includes diesel fuel consumption from testing and maintenance of the proposed emergency diesel generator.

As depicted in Table 4.7-5, mobile sources from proposed Master Plan buildout would result in a reduction in approximately 326,415 gallons of petroleum fuel usage per year compared to the existing conditions. For disclosure, by comparison, California as a whole consumes approximately 22 billion barrels gallons of petroleum per year (EIA 2024c).

Over the lifetime of the proposed Master Plan, the fuel efficiency of vehicles is expected to increase. As such, the amount of petroleum consumed due to vehicular trips to and from the Master Plan area during operation would decrease over time. As detailed in Section 4.7.2, Regulatory Setting, there are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted an approach to passenger vehicles that combines the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emissions vehicles in California, and the ACC II regulation that by 2035, all new passenger cars, trucks, and SUVs sold in California will be zero emissions (CARB 2011, 2022). Additionally, the CSU Sustainability Policy would result in the implementation of measures and programs at Cal Poly Pomona that would function to reduce overall petroleum usage with the proposed Master Plan, including using alternative transportation and/or alternative fuels, developing and implementing a transportation demand management (TDM) plan, increasing electric mobility and transportation device charging infrastructure and incentive programs, and requiring that 50% of all light duty vehicle purchases be ZEV by 2025, with no addition of gas-powered light duty vehicles to the fleet

after 2035. As such, operation of the proposed Master Plan is expected to use decreasing amounts of petroleum over time due to advances in vehicle fuel economy standards and compliance with the CSU Sustainability Policy.

Therefore, the proposed Master Plan would result in a decrease in petroleum at buildout of the Master Plan compared to existing conditions largely due to efficiency requirements for trucks and passenger vehicles and compliance with the CSU Sustainability Policy. The consumption of petroleum during Master Plan operations would not be considered inefficient or wasteful. Therefore, operational impacts of the proposed Master Plan related to petroleum usage would be **less than significant**.

Project-Level Analysis for Near-Term Projects

The above discussion for the proposed Master Plan also applies to the near-term projects, because it considers the growth of all Master Plan projects and near-term projects, and student, staff, and faculty growth. The consumption of energy resources (including electricity, natural gas, and petroleum) during the construction and operation of the near-term projects would not be considered inefficient or wasteful and impacts would be **less than significant**.

Impact 4.7-2 The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. (Less than Significant)

Program-Level Analysis for Master Plan

Construction

The proposed Master Plan would use construction contractors who must demonstrate compliance with applicable state and local regulations. Construction equipment would be required to comply with federal, state, and regional requirements where applicable. With respect to truck fleet operators, US EPA and National Highway Traffic Safety Administration (NHTSA) have adopted fuel-efficiency standards for medium- and heavy-duty trucks that will be phased in over time. Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018. US EPA and NHTSA also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25% reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type (EPA 2016). The energy modeling for trucks does not consider specific fuel reductions from these regulations, since they would apply to fleets as they incorporate newer trucks meeting the regulatory standards. However, these regulations would have an overall beneficial effect on reducing fuel consumption from trucks over time as older trucks are replaced with newer models that meet the standards.

In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of 5 minutes per occurrence. Off-road emissions standards would increase equipment efficiencies as they are phased-in overtime and less-efficient equipment is phased out of construction fleets. These limitations would result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these requirements are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy. Thus, based on the information above, construction of the proposed Master Plan would comply with state or local plans for renewable energy or energy efficiency.

Per CEQA Guidelines Appendix F, the proposed Master Plan's construction equipment would be consistent with the current energy standards applicable to construction equipment including limiting idling fuel consumption and using contractors that comply with applicable CARB regulatory standards that affect energy efficiency. Therefore, the proposed Master Plan would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency regarding during construction, and impacts would be **less than significant.**

Operation

The proposed Master Plan would comply with all applicable regulatory requirements including Title 24 of the California Code of Regulations which contains energy efficiency standards for residential and nonresidential buildings based on a state mandate to reduce California's energy demand. Specifically, Title 24 addresses a number of energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope such as windows, doors, wall/floor/ceiling assemblies, and roofs. Part 6 of Title 24 specifically establishes energy efficiency standards for residential and nonresidential buildings constructed in the State of California designed to reduce energy demand and consumption. Part 11 of Title 24 also includes the CALGreen building standards, which established mandatory minimum environmental performance standards for new construction projects. The proposed Master Plan would comply with Title 24, Part 6 and Part 11, per state regulations. Further, as described in Impact 4.7-1, Cal Poly Pomona would comply with the CSU Sustainability Policy, which would reduce energy use.

Additionally, the proposed Master Plan would receive electricity from SCE, which has a mandate to comply with SB 1020. This policy requires that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California by 2045, with 90% by 2035, and 95% by 2040, and that the zero-carbon electricity resources do not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling. Thus, the proposed Master Plan would not conflict with or obstruct a state or local plans for renewable energy or energy efficiency and operational impacts of the proposed Master Plan would be **less than significant**.

Project-Level Analysis for Near-Term Projects

The above discussion for the proposed Master Plan also applies to the near-term projects, because it considers the growth of all Master Plan projects and near-term projects, and student, staff, and faculty growth. Therefore, construction and operation of the near-term projects would comply with state or local plans for renewable energy or energy efficiency and impacts would be **less than significant**.

4.7.4.2 Cumulative Impacts

Impact 4.7-3 The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to energy. (Less than Significant)

This section provides an analysis of cumulative impacts from the construction and operation of the proposed Master Plan and other past, present, and reasonably foreseeable future projects, as required by Section 15130 of the State CEQA Guidelines. The geographic context for the cumulative analysis as it relates to energy is the SCE service area.

Energy Use

Cumulative projects that could exacerbate the proposed Master Plan's impacts include any projects that could result in wasteful, inefficient, or unnecessary use of energy. However, cumulative projects would be required by Los Angeles County or the City, as applicable, to conform to current federal, state, and local energy conservation standards, including the California Energy Code Building Energy Efficiency Standards (24 CCR Part 6), the CALGreen Code (24 CCR Part 11), and SB 743.

As a result, the proposed Master Plan, in combination with other reasonably foreseeable projects, would not cause a wasteful use of energy or other non-renewable natural resources. Therefore, the energy demand and use associated with the proposed Master Plan and cumulative projects would not substantially contribute to a cumulative impact on existing or proposed energy supplies or resources and would not cause a significant cumulative impact on energy resources. As such, the proposed Master Plan's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of electricity would not be cumulatively considerable and, thus, the cumulative impact would be **less than significant**.

Conflicts with Energy Plans

As discussed above, the proposed Master Plan in combination with other cumulative projects in the area would be subject to state law and any local plans would apply to cumulative projects under the jurisdiction of the County of Los Angeles or the adjacent cities. The proposed Master Plan would not conflict with applicable plans for renewable energy as it would be required to be solar-ready pursuant to Title 24. Further, other cumulative projects, including development throughout the SCE service area, would also be subject to the Title 24 standards in place at the time of construction. It is speculative whether other cumulative projects would conflict with a state or local plan for renewable energy. However, future cumulative projects requiring discretionary approval would be subject to CEQA and required to evaluate whether they would conflict with applicable plans. As such, the proposed Master Plan in combination with other reasonably foreseeable projects, would not conflict with a state or local plans for renewable energy or energy efficiency. The proposed Master Plan's contribution to cumulative impacts related to energy or energy efficiency would not be cumulatively considerable and, thus, cumulative impacts would be **less than significant**.

4.7.5 Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

4.7.6 Level of Significance After Mitigation

All impacts would be less than significant without mitigation.

4.7.7 References

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4.8 Geology and Paleontology

The following analysis identifies potential impacts related to geology, soils, and paleontology resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing geological conditions in the proposed Master Plan area, discusses the regulatory setting, evaluates potential impacts, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts.

No comments related to geology and paleontology were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are provided in Appendix A.

4.8.1 Environmental Setting

4.8.1.1 Regional Geology

The Cal Poly Pomona campus is located within the northern Peninsular Ranges Geomorphic Province, which consists of a series of mountain ranges separated by long valleys, which are branched off the San Andreas Fault. The province extends nearly 900 miles to the tip of Baja California Peninsula and is approximately 55 to 80 miles wide. The geology of this province is reminiscent of the Sierra Nevada ranges, which consists of granitic and metamorphic rocks overlain by marine and non-marine sedimentary units, and the topography is similar to that of the Coastal Ranges Province (California Geological Survey [CGS] 2002a; Yerkes et al. 1965). The proposed Master Plan area is also located within the northeastern block of the Los Angeles Basin, which also lies in the northern portion of the Peninsular Ranges Geomorphic Province. This block forms a triangular wedge about 35 miles long. The sedimentary rocks within this portion of the Los Angeles Basin are mainly marine clastic rocks of Cenozoic age that are overlain by Holocene (<11,700 years ago) and Pleistocene (11,700 – 2.58 million years ago [mya] alluvial deposits in low-lying areas (Yerkes et al. 1965).

4.8.1.2 Topography and Site Geology

The Cal Poly Pomona campus is located on a gently sloping alluvial fan, which originates at the mouth of the San Antonio Canyon and slopes gradually to the south and southwest. The topography of the Cal Poly Pomona campus ranges from approximately 1,000 feet above mean sea level within the agricultural hills northwest of Temple Avenue and north of University Drive, dropping to approximately 725 feet above mean sea level in the flattest portion of the campus along the eastern edge of the campus near Valley Boulevard and the agricultural fields south of Kellogg Drive (CSU 2012). Within the campus, slopes range from minimal (3%) in the east, gradually getting steeper to the west, where slopes range from 20% to greater than 30% in some areas. Over 30% of the campus contains slopes greater than 30% (CSU 2012).

According to mapping by the California Geological Survey (CGS), the campus is underlain by Quaternary (up to 2.6 mya) alluvium and Miocene (approximately 23 mya to 5.3 mya) marine sandstone, shale, siltstone, shale and conglomerate that is moderately to well consolidated (CGS 2024). According to surficial geological mapping by Dibblee and Minch (2002) at a 1:24,000 scale and the geological time scale of Cohen et al. (2024), the proposed Master Plan area is underlain by Holocene (<11,700 years ago) surficial sediments (map unit Qa) and landslide and talus rubble (map unit Qls); the late Miocene (approximately 5.3 mya – 11.63 mya) Monterey (Puente) Formation, La Vida Shale Member (Map unit Tmlv) and the Yorba Shale Member (map unit Tmy); and the middle Miocene (approximately 11.63 mya – 15.98 mya) Topanga Formation sandstone (map unit Tt) and conglomerate (map unit Ttc). Holocene surficial deposits are typically an unconsolidated mixture sand and gravel. The Monterey

(Puente) Formation, within the proposed Master Plan area, consists of light gray and white thinly bedded shales, and the Topanga Formation consists of light gray to tan sandstone and conglomerate (Dibblee and Minch 2002).

Previous geotechnical investigations at the campus have identified artificial fill underlain by alluvium and, beneath that, the Puente Formation, a series of stiff to hard siltstones, claystones, and dense sandstones with occasional cobble layers (Geocon 2011). In the north-central portion of the proposed Master Plan area, geotechnical reports from various campus projects have recorded the depths to geologic units of paleontological interest. All geotechnical studies were conducted in a portion of the proposed Master Plan area mapped as Holocene surficial sediments. In 1994, when the engineering building was constructed, Petra Geotechnical measured the top of the Puente Formation at 5 feet below ground surface (bgs) (Petra 1994). Geocon conducted several studies within the proposed Master Plan area and returned the following results in 2001. At the location of the library, they recorded the top of the Puente Formation between 5 and 18 feet bgs (Geocon 2001). In the parking lot area, they encountered older alluvium (likely Pleistocene in age) between 7 and 22 feet bgs in areas (this unit is not mapped surficially), the Puente Formation between 10 and 48 feet bgs, and the Topanga Formation between 34.5 to 48 feet bgs (Geocon 2003). In 2011, in a campus wide study, the Puente Formation was recorded between 15.5 and 28.5 feet bgs (Geocon 2011).

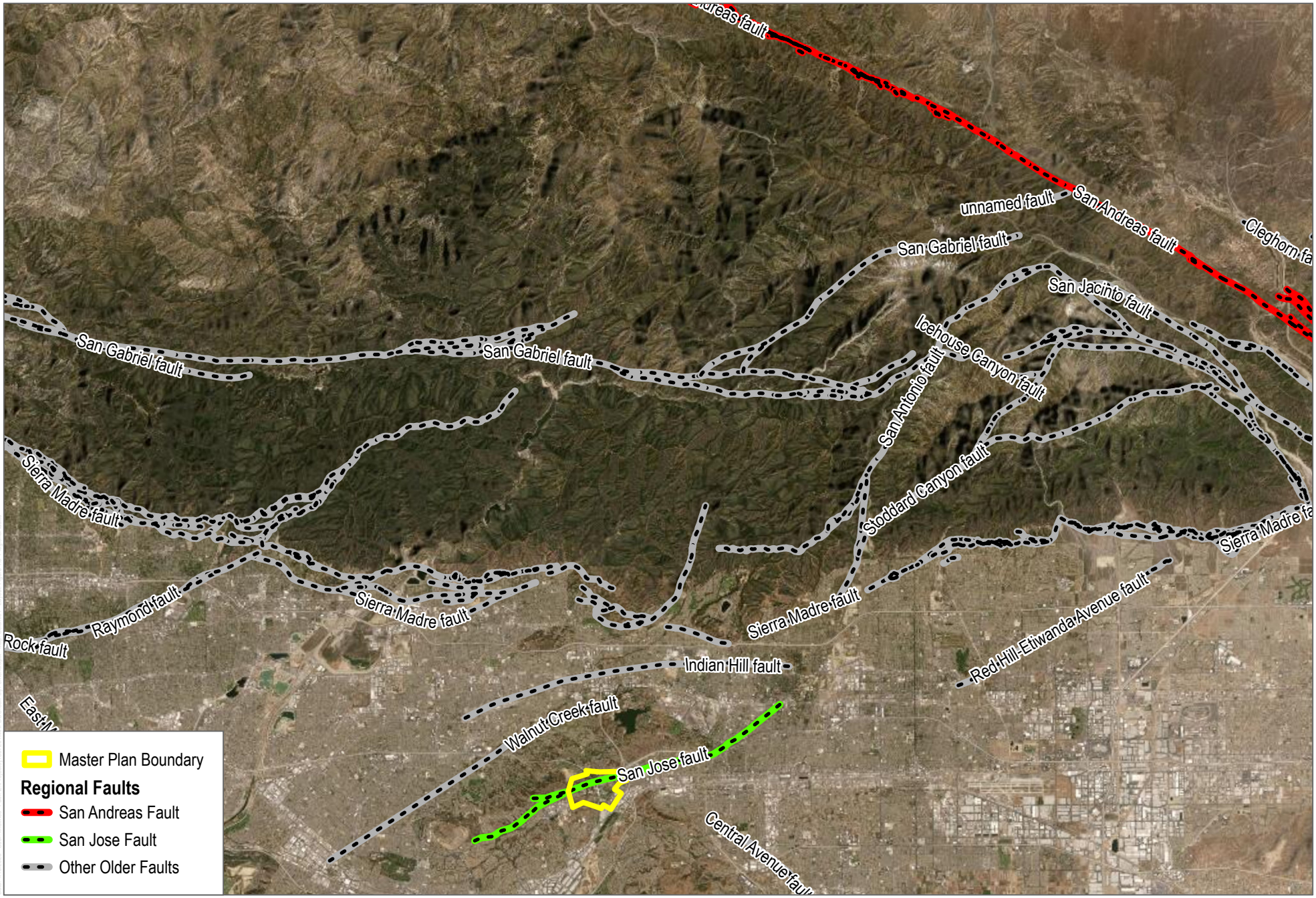
4.8.1.3 Seismic Conditions

Southern California is a region of considerable seismic activity with numerous Holocene-active[1] faults that are related to the active margin of the North American and Pacific tectonic plates. Earthquakes along the San Andreas Fault relieve the convergent plate stress from these two tectonic plates, which result in right lateral offsets along fault planes. Faulting associated with the compressional forces creates earthquakes and is primarily responsible for the mountain building, basin development, and regional upwarping found in this area.

The principal active faults in the region include the San Andreas, Raymond, San Jacinto and Whittier-Elsinore Faults (see Figure 4.8-1). Over the last 100 years, there have been a number of substantial seismic events, or earthquakes, in the region of the proposed Master Plan area. Historical earthquakes in the region of the site include the 1910 Elsinore earthquake (Magnitude 6), 1923 North San Jacinto Fault Earthquake (Magnitude 6.3), 1992 Landers Earthquake (Magnitude 7.3), 1992 Big Bear Earthquake (Magnitude 6.4), and the 1918 San Jacinto Earthquake (Magnitude 6.8) (SCEDC 2024). Richter magnitude (M) is one measure of the size of an earthquake as recorded by a seismograph, the standard instrument that records ground shaking. The reported Richter magnitude for an earthquake represents the highest amplitude measured by the seismograph at a distance of 100 kilometers from the epicenter. Richter magnitudes vary logarithmically, with each whole number step representing a tenfold increase in the amplitude of the recorded seismic waves. Earthquake magnitudes are also measured by their moment magnitude (Mw), which is related to the physical characteristics of a fault, including the rigidity of the rock, the size of fault rupture, and the movement or displacement across a fault (CGS 2002b).

According to CGS Special Publication 42, an active fault is defined as one that has had surface displacement within Holocene time (the last 11,700 years) and is referred to as a Holocene-active fault (CGS 2018). The campus is located within the vicinity of a number of Holocene-active faults including the San Andreas Fault (approximately 23 miles northeast), the northwest trending San Jacinto fault zone (approximately 25 miles to the east), Whittier-Elsinore fault (approximately 8 miles southwest), and the Sierra Madre fault (approximately 6 miles northwest), as shown on Figure 4.8-1.

[1] A Holocene-active fault is a fault where evidence has demonstrated that displacement along that fault has occurred sometime within the last 11,700 years (CGS 2018).



SOURCE: California Geological Survey; World Imagery

DUDEK

0 10,000 20,000 Feet

FIGURE 4.8-1

Regional Faults

Cal Poly Pomona Campus Master Plan EIR

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4.8.1.4 Local Faults

In addition to regional faults, there are several local faults located within the City of Pomona, near the Cal Poly Pomona campus, that are not considered Holocene-active but are recognized as having older displacement. However, a major earthquake occurring along any of these faults would be capable of generating seismic hazards and strong ground-shaking effects within the area. These local faults include the Indian Hill, Chino, Central Avenue, and San Jose Faults, the latter of which crosses the main campus. According to the CGS classifications and temporal evidence of displacement, the Indian Hills Fault, Chino Fault, and Central Avenue Fault do not have a high probability of seismic activity, and none of the local faults have been placed in an Alquist-Priolo Special Studies Zone (CGS 2018).

In 2000, a study was conducted on the Cal Poly Pomona campus to determine the probability of seismic activity (CSU 2012). Based on the findings, it was determined that there are two thrust faults present within the central portion of the campus with Holocene and potentially Pleistocene activity thought to be associated with the San Jose Fault. From additional studies it was determined that subsurface materials dating to 3,500 years ago were displaced from faulting, which suggests that the San Jose Fault in this area should be considered a Holocene-active fault (Geocon 2011). According to the California State University (the CSU) Board of Trustees, the San Jose Fault is considered a Holocene-active fault (CSU 2024).

4.8.1.5 Surface Fault Rupture

Surface fault rupture occurs where displacement or fissuring occurs along a fault zone at ground surface. Ground rupture is considered most likely along Holocene active faults. Although primary ground damage due to earthquake fault rupture typically results in a relatively small percentage of the total damage in an earthquake, the location of structures or facilities too close to a rupturing fault that results in ground displacement can cause substantial damage. The primary method to avoid this hazard is to conduct an investigation to adequately identify locations of active or potentially active faults, primarily through conducting a fault trenching study, and set structures and facilities away from the fault trace. The magnitude and nature of fault rupture can vary for different faults, or even along different strands of the same fault.

The Alquist-Priolo Earthquake Fault Zoning Act, passed in California in 1972, requires that the State Geologist establish Earthquake Fault Zones around the surface traces of active faults and issue corresponding maps. The Cal Poly Pomona campus is not located within or immediately adjacent to an Alquist-Priolo earthquake fault zone. However, as noted above, the CSU Seismic Review Board considers the San Jose Fault, which crosses the main campus, to be a Holocene-active fault (CSU 2024).

4.8.1.6 Liquefaction and Lateral Spreading

Soil liquefaction occurs primarily in saturated, loose, fine-to-medium-grained soils in areas where the groundwater table is within 50 feet of the ground surface. Shaking suddenly (as with an earthquake) causes granular soils to lose frictional strength and as a result they begin to behave more as a liquid than a solid, resulting in ground failure. Liquefaction-related effects include loss of bearing strength, ground oscillations, lateral spreading, and flow failures or slumping. Lateral spreading is related to liquefaction and occurs when liquefiable materials move as a block toward an open sloped face.

The soils most susceptible to liquefaction are clean, loose, uniformly graded, saturated sands and silts. According to data compiled for the CGS, the majority of the campus is located in an area that is considered susceptible to liquefaction (see Figure 4.8-2) (OES 2024).

4.8.1.7 Subsidence

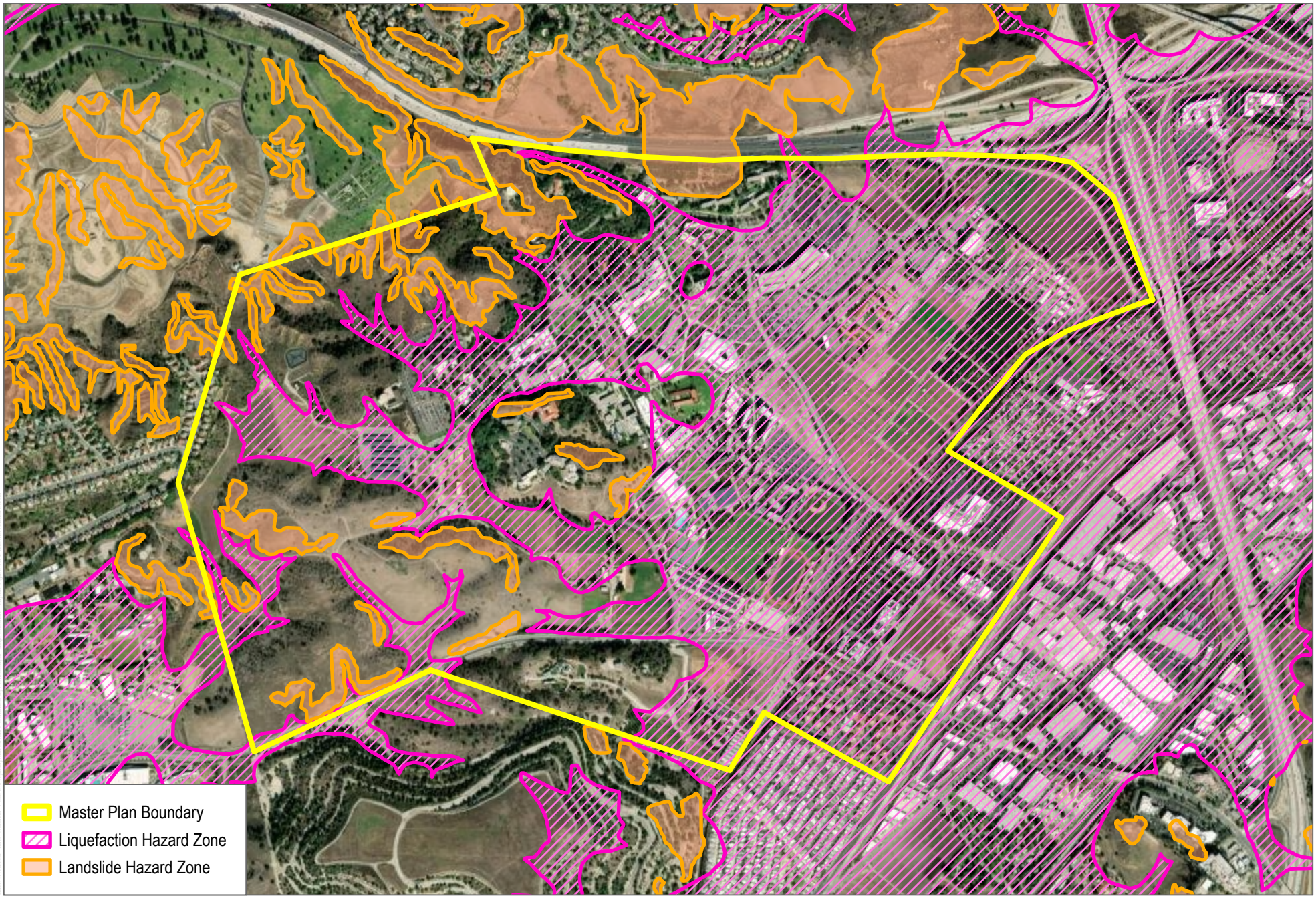
Under certain circumstances, densification or compaction of soils can result in settlement or subsidence that can cause damage to foundations and structures, as well as water and sewer lines. In addition to subsidence caused by ground shaking/tectonic movements (discussed above), subsidence can occur from a few different factors including aquifer-system compaction due to lowering of groundwater levels by sustained groundwater overdraft; hydrocompaction of moisture deficient deposits above the water table (typically associated with irrigation of arid areas); fluid withdrawal from oil and gas fields; and subterranean mining. Based on a review of a USGS subsidence map, the campus is not located in an identified area of subsidence (USGS 2024). There is an area of subsidence associated with groundwater withdrawal located approximately 4 miles east of the campus. Subsidence in California is integrally linked to irrigation for agriculture from groundwater pumping. The lowering of the groundwater table for agricultural irrigation can cause compaction of the sediments by reducing the size and number of open pore spaces (USGS 2000). In aquifer systems that include semi-consolidated silt and clay layers (aquitards) of sufficient aggregate thickness, long-term groundwater-level declines can result in a vast one-time release of "water of compaction" from compacting aquitards, which manifests itself as land subsidence.

4.8.1.8 Landslides

Landslides include many phenomena that involve the downslope displacement and movement of material, triggered either by static (i.e., gravity) or dynamic (i.e., earthquake) forces. Exposed rock slopes undergo rockfalls, rockslides, or rock avalanches, while soil slopes experience soil slumps, rapid debris flows, or deep-seated rotational slides. Slope stability can depend on a number of complex variables, including the underlying geology, structure, and amount of groundwater, as well as external processes such as climate, topography, slope geometry, and human activity. Landslides can occur on slopes of 15% or less, but the probability is greater on steeper slopes that exhibit old landslide features such as scarps, slanted vegetation, and transverse ridges. Significant factors that contribute to landslides or slope failure include slope height and steepness, shear strength and orientation of weak layers in the underlying geologic units, pore water pressures, rainfall, human activities such as excavation, or seismic activity. Downhill ground displacement may variously be termed a slope failure, landslide, or debris flow based on the speed, mass, and type of movement. As noted above, the campus includes areas with a range of inclines some of which are over 20%. In addition, there are some areas of the upland hilly areas of the campus toward the west that are mapped as susceptible to earthquake induced landslides in accordance with the Seismic Hazard Zonation Program as shown in Figure 4.8-2 (OES 2024).

4.8.1.9 Expansive Soils

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with cyclical changes in the moisture content. The ability of clayey soils to change volume can over time result in uplift or cracking to foundation elements or other rigid structures such as slabs-on-grade, rigid pavements, sidewalks, or other slabs or hardscape founded on these soils. According to work completed at the campus, some of the soils on the proposed Master Plan area exhibit expansive characteristics, which can cause movement and cracking of footings and floor slabs resulting in building damage (CSU 2012).



SOURCE: California Geological Survey; Los Angeles County; World Imagery

DUDEK

0 500 1,000 Feet

FIGURE 4.8-2

Seismic Hazard Zones

Cal Poly Pomona Campus Master Plan EIR

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4.8.1.10 Paleontological Resources and Unique Geologic Features

Dudek requested a paleontological records search from the Natural History Museum of Los Angeles County (NHMLA) on November 11, 2024, and the results were received on December 8, 2024. The NHMLA reported no fossil localities from within the site; however, they have nearby localities from similar sediments that likely underlie the proposed Master Plan area on the surface and at depth.

Of the nearby localities reported by the NHMLA, the closest are as follows: LACM VP (Los Angeles County Museum Vertebrate Paleontology) 6172, approximately 0.34 miles north of the campus, yielded fossil fish (Osteichthyes) from an unknown depth bgs; LACM VP 7471, approximately 0.77 miles north-northeast of the proposed Master Plan area, produced a fossil mola fish (*Molidae*) from an unknown depth bgs; LACM VP 6166, approximately 1.05 miles north of the campus, yielded a fossil sturgeon fish (*Prionurus*) from the surface; and LACM VP 6171, approximately 1.92 miles west of the proposed Master Plan area, produced fossil fish of the herring/anchovy family (*Ganolytes*) from an unknown depth bgs. All localities were found in the Puente Formation (NHMLA 2024).

A search of online paleontological databases produced three nearby localities: two from the Puente Formation and one from the Topanga Formation. Fossil Locality Los Angeles County Museum (LACM 7153) produced fossil fish from the Puente Formation approximately 3.11 miles north-northeast of proposed Master Plan area in San Dimas (Paleobiology Database [PBDB] 2024). A fossil opossum and fish were collected from the Puente Formation approximately 3.78 mi northwest at the Featherstone Quarry in Covina, (PBDB 2024). Lastly, approximately 4.28 miles northwest of the campus, locality (LACMIP [Los Angeles County Museum Invertebrate Paleontology]) 1292 within a Glendora Avenue roadcut yielded a fossil mantis shrimp from the Topanga Formation (PBDB 2024).

The Holocene alluvial deposits, aged less than 11,700 years ago, do not typically produce any fossil resources and therefore have low paleontological sensitivity, but sensitivity increases to high starting at depths of 5 feet bgs, where the shallowest Puente Formation deposits have been mapped, and at 5 bgs or greater depths where the Holocene alluvial deposits are underlain by the Puente Formation, Topanga Formation, and/or Pleistocene older alluvium at depths greater than 5 feet bgs. Geocon's 2003 geotechnical study shows that Pleistocene older alluvium occurs below Holocene deposits and above the Puente Formation in some portions of the proposed Master Plan area. Pleistocene age units have high paleontological sensitivity. The Miocene Monterey (Puente) Formation and the Topanga Formation both have high paleontological sensitivity.

No unique geological features were identified within the campus on the surface or at depth.

4.8.2 Regulatory Setting

4.8.2.1 Federal

Earthquake Hazards Reduction Act

The United States Congress passed the Earthquake Hazards Reduction Act in 1977 to reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program. To accomplish this goal, the act established the National Earthquake Hazards Reduction Program. This program was substantially amended in November 1990 by the National Earthquake Hazards Reduction Program Act, which refined the description of agency responsibilities, program goals, and objectives.

Occupational Safety and Health Administration Regulations

Excavation and trenching are among the most hazardous construction operations. Occupational Safety and Health Administration (OSHA) Regulations OSHA Excavation and Trenching Standard, Title 29 of the Code of Federal Regulations, Part 1926, Subpart P, covers requirements for excavation and trenching operations. OSHA requires that all excavations in which employees could potentially be exposed to cave-ins be protected by sloping or benching the sides of the excavation, supporting the sides of the excavation, or placing a shield between the side of the excavation and the work area.

4.8.2.2 State

California Building Code

The state's 2022 California Building Code (CBC), Title 24 of the California Code of Regulations, is a compilation of building standards, including seismic safety standards, for new buildings. CBC standards are based on adopted state building standards adopted without change from a national model code as well as national building standards that have been changed to address particular California conditions and standards authorized by the California State Legislature but not covered by the national model code. The CBC applies to all occupancies in California, except where stricter standards have been adopted by local agencies.

Chapters 16 and 16A of the 2022 CBC include structural design requirements governing seismically resistant construction, including (but not limited to) factors and coefficients used to establish seismic site class and seismic occupancy category for the soil/rock at the building location and the proposed building design. Chapters 18 and 18A include the requirements for foundation and soil investigations (Sections 1803 and 1803A); excavation, grading, and fill (Sections 1804 and 1804A); damp-proofing and water-proofing (Sections 1805 and 1805A); allowable load-bearing values of soils (Sections 1806 and 1806A); the design of foundation walls, retaining walls, embedded posts and poles (Sections 1807 and 1807A), and foundations (Sections 1808 and 1808A); and design of shallow foundations (Sections 1809 and 1809A) and deep foundations (Sections 1810 and 1810A). Chapter 33 of the 2019 CBC includes requirements for safeguards at work sites to ensure stable excavations and cut or fill slopes (Section 3304).

Construction activities are subject to occupational safety standards for excavation and trenching, as specified in the California Safety and Health Administration regulations (Title 8 of the California Code of Regulations) and in Chapter 33 of the CBC. These regulations specify the measures to be used for excavation and trench work where workers could be exposed to unstable soil conditions. The proposed Master Plan would be required to employ these safety measures during excavation and trenching.

The CBC is published on a triennial basis, and supplements and errata can be issued throughout the cycle. The 2022 edition of the CBC became effective on January 1, 2023, and incorporates by adoption the 2021 edition of the International Building Code of the International Code Council, with California amendments. The 2022 CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety.

California Occupational Safety and Health Administration Regulations

In California, California OSHA (Cal/OSHA) has responsibility for implementing federal rules relevant to worker safety, including slope protection during construction excavations. Cal/OSHA's requirements are more restrictive and protective than federal OSHA standards. Title 8 of the California Code of Regulations, Chapter 4, Division of Industrial Safety, covers requirements for excavation and trenching operations, as well as safety standards whenever employment exists in connection with the construction, alteration, painting, repairing, construction maintenance, renovation, removal, or wrecking of any fixed structure or its part.

California Environmental Quality Act

The CEQA Guidelines require that all private and public activities not specifically exempted be evaluated against the potential for environmental damage, including effects to paleontological resources. Paleontological resources, which are limited, nonrenewable resources of scientific, cultural, and educational value, are recognized as part of the environment under these state guidelines. This study satisfies project requirements in accordance with CEQA (13 PRC [Public Resources Code], 21000 et seq.).

Paleontological resources are explicitly afforded protection by CEQA, specifically in Section VII(f) of CEQA Guidelines Appendix G, the "Environmental Checklist Form," which addresses the potential for adverse impacts to "unique paleontological resource[s] or site[s] or … unique geological feature[s]." This provision covers scientifically significant fossils – remains of species or genera new to science, for example, or fossils exhibiting features not previously recognized for a given animal group – as well as localities that yield fossils significant in their abundance, diversity, preservation, and so forth.

In addition to CEQA, the California Public Resources Code Section 5097.5 (Stats 1965, c 1136, p. 2792) regulates removal of paleontological resources from state lands, defines unauthorized removal of fossil resources as a misdemeanor, and requires mitigation of disturbed sites.

Alquist Priolo Act

The Alquist-Priolo Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. In accordance with this act, the State Geologist established regulatory zones, called "earthquake fault zones," around the surface traces of active faults and has published maps showing these zones. Earthquake fault zones are designated by the CGS and are delineated along traces of faults where mapping demonstrates surface fault rupture has occurred within the past 11,700 years. Construction within these zones cannot be permitted until a geologic investigation has been conducted to prove that a building planned for human occupancy would not be constructed across an active fault. These types of site evaluations address the precise location and recency of rupture along traces of the faults and are typically based on observations made in trenches excavated across fault traces. The proposed Master Plan area is not located within an identified Alquist-Priolo earthquake fault zone.

Seismic Hazards Mapping Act

In order to address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990 (Public Resources Code Section 2690-2699). Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate "seismic hazard zones." Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of their project sites have been investigated and appropriate mitigation measures, if any, have been incorporated into development plans. The state Mining and Geology Board provides additional regulations

and policies to assist municipalities in preparing the Safety Element of their General Plan and encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety. Under Public Resources Code Section 2697, cities and counties must require, prior to the approval of a project located in a Seismic Hazard Zone, submission of a *Preliminary Geotechnical Report* defining and delineating any seismic hazard. Each city or county must submit one copy of each *Preliminary Geotechnical Report*, including mitigation measures, to the State Geologist within 30 days of its approval. Under Public Resources Code Section 2698, cities and counties may establish policies and criteria that are stricter than those established by the Mining and Geology Board.

State publications supporting the requirements of the Seismic Hazards Mapping Act include the CGS Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California (CGS 2008), discussed above, and Special Publication 118, Recommended Criteria for Delineating Seismic Hazard Zones in California (CGS 2004). Special Publication 117A provides guidelines to assist in the evaluation and mitigation of earthquake-related hazards for projects within designated zones requiring investigations and to promote uniform and effective statewide implementation of the evaluation and mitigation elements of the Seismic Hazards Mapping Act. Special Publication 118 provides recommendations to assist the CGS in carrying out the requirements of the Seismic Hazards Mapping Act to produce the Probabilistic Seismic Hazard Maps for the state. Much of the proposed Master Plan area is located within a Liquefaction Seismic Hazard Zone.

CSU Seismic Requirements

The CSU Seismic Requirements (CSU 2024), prepared by the CSU Office of the Chancellor, include specific requirements for the construction of new buildings and the rehabilitation of existing buildings to ensure that all CSU buildings provide an acceptable level of earthquake safety, per the California Building Code. The policy originally adopted by the CSU Board of Trustees in 1993 supplements the requirements of the California Building Code and is provided below.

> It is the policy of the Trustees of the California State University that to the maximum extent feasible by present earthquake engineering practice to acquire, build, maintain, and rehabilitate buildings and other facilities that provide an acceptable level of earthquake safety for students, employees, and the public who occupy these buildings and other facilities at all locations where University operations and activities occur. The standard for new construction is that it meets the life safety and damageability objectives of Title 24 provisions; the standard for existing construction is that it provides reasonable life safety protection, consistent with that for typical new buildings. The California State University shall cause to be performed independent technical peer reviews of the seismic aspects of all construction projects from their design initiation, including both new construction and remodeling, for conformance to good seismic resistant practices consistent with this policy. The feasibility of all construction projects shall include seismic safety implications and shall be determined by weighing the practicality and cost of protective measures against the severity and probability of injury resulting from seismic occurrences.

The CSU Seismic Requirements describe the CSU framework used to implement the CSU Board of Trustees' Seismic Policy. All new construction is required to meet the life, safety, and damage objectives of Title 24 of the California Building Code, while the standard for rehabilitating existing structures is that reasonable life safety protection is provided, consistent with that for typical new structures.

Geotechnical investigations are required by the CSU Seismic Requirements to assess and classify a building site's soils. Any geotechnical investigation conducted for future developments shall include consideration of all seismically induced site failure hazards, including liquefaction, differential settlement, lateral spreading, landsliding, and surface faulting. As the CSU has determined campus-specific seismic design ground motion parameters to be used for new and modification of existing buildings that supersede those given in the California Building Code, geotechnical investigations do not require additional site exposure work for determining seismic design requirements. These seismic design ground motion parameters are used by the geotechnical engineer during project design.

Independent technical peer reviews shall be conducted concerning the seismic aspects of all construction projects from their design initiation, including both new construction and remodeling, for conformance with good seismic-resistant practice consistent with this policy. The CSU Seismic Review Board is charged with implementing the independent peer review requirements and advises CSU on structural engineering issues for specific projects.

4.8.3 Thresholds of Significance and Methodology

4.8.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section15064.7). The significance criteria used to evaluate the proposed Master Plan impacts related to geology, soils, and paleontology are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to geology, soils, and paleontology would occur if the proposed Master Plan would:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of as known fault. Refer to Division of Mines and Geology Special Publication 42.
    b. Strong seismic ground shaking.
    c. Seismic-related ground failure, including liquefaction.
    d. Landslides.
2. Result in substantial soil erosion or the loss of topsoil. (This topic is evaluated in Section 4.10, Hydrology and Water Quality and is not further discussed in this section.)
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.
5. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

4.8.3.2 Methodology

Impacts to geology, soils, and paleontology were evaluated using previously prepared geological and geotechnical studies for Cal Poly Pomona, mapping by the CGS, and a Los Angeles County Natural History Museum records search for paleontological resources. 1. Soil erosion and related water quality issues are evaluated in Section 4.11, Hydrology and Water Quality and these topics are not further discussed in this section.

4.8.4 Impact Analysis

4.8.4.1 Issues Not Further Evaluated

The proposed Master Plan would have no impact with respect to the following thresholds of significance and therefore these topics are not further evaluated:

- Soils Incapable of Supporting Septic Tanks. Wastewater generated from the proposed Master Plan would be diverted to the existing sanitary sewer system on the campus. No septic tanks or alternative wastewater disposal systems would be utilized for the proposed Master Plan. Therefore, implementation of the proposed Master Plan would have no impact.

4.8.4.2 Project Impacts

Impact 4.8-1 **The project would not directly or indirectly cause potential adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking and seismic-related ground failure (including liquefaction and landslides). (Less than Significant)**

Program-Level Analysis for Master Plan

Fault Rupture

Several major Holocene-active earthquake fault zones are located within the general region of the proposed Master Plan area (CGS 2018). However, no Alquist-Priolo earthquake fault zones in accordance with Special Publication 42 are located in or in close vicinity of the proposed Master Plan area (CGS 2018). The nearest Alquist-Priolo earthquake fault zone to the proposed Master Plan area is the Sierra Madre fault zone, which is located approximately 6 miles northwest of the campus. However, the San Jose Fault, classified by the CGS as a late Quaternary fault, does intersect the proposed Master Plan area and has been the subject of previous geotechnical investigations (Geocon 2011). According to the 2011 geotechnical report, previous investigations determined that onsite materials dated at 3,500 years ago were displaced, which would indicate that the fault should be considered Holocene-active (Geocon 2011). The CSU Board of Trustees have developed Seismic Requirements that apply to all structures within the bounds of a CSU campus Master Plan (CSU 2024). Within the CSU Seismic Requirements document, the CSU Seismic Review Board considers the San Jose Fault to be a Holocene-active fault (CSU 2024). As a result, any new construction or renovations “shall have detailed geologic studies of the building site to determine if a fault trace passes through, or is within 50 feet, of the building perimeter” under the Seismic Requirements (CSU 2024). The Seismic Requirements also require that all geotechnical reports are peer reviewed to ensure compliance with CSU Seismic Requirements and CBC requirements. In addition, fault rupture generally occurs because of sudden releases of built-up tectonic stresses that is expressed on an existing fault plane. Therefore, with adherence to the CSU Seismic Requirements, development and redevelopment associated with the

proposed Master Plan would not directly or indirectly cause fault rupture. As a result, considering that the San Jose Fault is not considered an Alquist-Priolo Earthquake fault and that all construction that would occur with the proposed Master Plan would be done in accordance with CSU Seismic Requirements and CBC requirements, potential impacts related to fault rupture hazards would be **less than significant**.

Seismic Ground Shaking

The campus is located in the seismically active region of Southern California that is expected to experience substantive seismic events in the future. The location of numerous Holocene-active regional faults in the region could be a potential source of a seismic event that could cause substantive ground shaking at the campus. If not constructed appropriately, buildings and associated improvements could become damaged and cause injury or death. However, all development and redevelopment under the proposed Master Plan would be designed and constructed in accordance with the most current version of the CBC, which includes seismic design requirements (e.g., site preparations of subsurface soils [i.e., compaction], foundation design, and structural materials), to minimize any substantive damage or catastrophic failure that might occur with strong seismic ground shaking. The CBC sets forth structural design parameters for buildings to withstand seismic shaking without substantial structural damage. Section 1803 of the California Building Code requires preparation of a final design level site-specific geotechnical report to assess the degree of potential seismic hazards and recommend appropriate design/mitigation measures to be incorporated into design plans. The CBC contains standards and regulations relating to seismic safety and construction standards for building foundations. Conformance with the CBC, as required by state law, would minimize the potential for damage of new structures and their foundations. In addition, as noted above, the CSU Seismic Requirements includes additional measures such as preparation of a site-specific geotechnical report and seismic peer reviews to ensure compliance with current seismic design requirements. Furthermore, implementation of the proposed Master Plan includes renovations of existing buildings that would involve seismic upgrades and reinforcements to improve the structural integrity and safety of existing buildings. As a result, the proposed Master Plan, would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking, and impacts would be **less than significant**.

Seismic-Related Ground Failure

According to data compiled by the CGS, a large portion of the proposed Master Plan area is located within a Seismic Hazard Zone for susceptibility to liquefaction (see Figure 4.8-2) (OES 2024). In addition, soil borings that were drilled at the campus as part of the 2011 geotechnical investigation observed groundwater levels ranging from approximately 13 to 24 feet bgs, which is similar to what was observed in 2003 (Geocon 2011 and Geocon 2003). As a result, liquefaction and related ground failure (e.g., lateral spreading, sand boils and dynamic settlement) could occur for development projects located within the campus. However, this hazard can only be more definitively determined by a site-specific geotechnical evaluation, as required by the CBC and for development sites located within the Seismic Hazard Zone for liquefaction as shown in Figure 4.8-2. Development within the Seismic Hazard Zone for liquefaction would be required to adhere to the requirements of the Seismic Hazard Zonation Act, which is detailed in Special Publication 117A. All of the proposed improvements that would be associated with the proposed Master Plan would be required to comply with the current version of the CBC and Special Publication 117A. Standard geotechnical engineering procedures, soil testing, and proper design can identify and mitigate liquefiable soils through site preparations (e.g., removal of liquefiable soils and replacement with engineered fills) and/or foundation design (e.g., deep foundation systems that are set into deeper more competent materials). By using the most up-to-date standards, potential damage related to liquefaction and lateral spreading, including differential settlement, would be minimized. These engineering practices could include densification of soils, soil

reinforcement, and drainage/dewatering to reduce pore water pressure within the soil. In accordance with CBC requirements, these design requirements would be included in the project-specific geotechnical report, which would have to be incorporated in site preparations and foundation design to minimize the potential for structural damage caused by seismic-related ground failure such as liquefaction. Furthermore, development of the proposed Master Plan would not directly or indirectly cause or exacerbate adverse effects involving seismic-related ground failure, including liquefaction. Therefore, impacts would be **less than significant**.

Landslides

The propensity for landslides (earthquake-induced or non-earthquake induced) is greatest in hilly areas with steep slopes and bedrock or soils that are prone to mass movement. As illustrated on Figure 4.8-2, there are some portions of the upland areas of the campus toward the west boundary that are mapped as susceptible to earthquake-induced landslides in accordance with the Seismic Hazards Program (OES 2024). In the absence of proper grading and excavation techniques, excavating into a hillside during construction or placement of structures within or immediately adjacent to steep slopes could potentially trigger a landslide, which in turn could endanger people and property in the vicinity of the site. With respect to future redevelopment and/or new construction associated with the proposed Master Plan, compliance with the CBC and Special Publication 117A (i.e., Seismic Hazard Zonation Program), including completion of a final design level geotechnical report, would minimize the potential for slope instability to occur. The required site-specific geotechnical report, which would include, as appropriate, a slope stability analysis and provide remedial measures to address any potential slope instability would be incorporated into site designs. As a result, implementation of the proposed Master Plan would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Impacts are considered **less than significant**.

Project-Level Analysis for Near-Term Projects

Proposed near-term projects could be subject to fault rupture, seismic-related ground shaking, seismic-related ground failure (e.g., liquefaction) and landslides, as described above for the proposed Master Plan. Due to the presence of the San Jose Fault, considered a Holocene-active fault by the CSU Seismic Review Board, near-term projects that consist of new construction or renovations (including the new Engineering Graduate Building, the new Bronco Mobility Hub, and proposed near-term building renovations) “shall have detailed geologic studies of the building site to determine if a fault trace passes through, or is within 50 feet, of the building perimeter” under the Seismic Requirements (CSU 2024). The CSU Seismic Requirements stipulate that geotechnical investigations are required to assess the potential for all seismically induced site failure hazards, including liquefaction, differential settlement, lateral spreading, landsliding, and surface faulting. The CSU Seismic Requirements also stipulate that all geotechnical reports are peer reviewed to ensure compliance with CSU Seismic Requirements and CBC requirements. With compliance with the CBC, Special Publication 117A (i.e., Seismic Hazard Zonation Program), and the CSU Seismic Requirements, described above, including completion and implementation of a final design level geotechnical report and associated recommendations, implementation of near-term projects would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving fault rupture, seismic-related ground shaking, and seismic-related ground failure (including liquefaction and landslides) and impacts would be **less than significant**.

Impact 4.8-2 **The project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and would not potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. (Less than Significant)**

Program-Level Analysis for Master Plan

As discussed in Impact 4.8-1, there are areas of the campus that have been mapped by CGS as areas that are susceptible to liquefaction as well as a few areas considered to have a potential for earthquake-induced landslides. However, as required by the Seismic Hazards Zonation Program and the CBC, all proposed development and redevelopment would be constructed in accordance with the recommendations of a design level project-specific geotechnical report, which would include recommendations for remedial grading, as necessary, and site preparations combined with foundation designs consistent with Special Publication 117A to ensure stability of soils and fills to support proposed structures.

The campus is not located in an area of recorded regional ground subsidence, historical and current, due to groundwater pumping, peat loss, or oil extraction (USGS 2024). Adherence to building code requirements would ensure that existing site soils and fills are suitable to support all proposed development and redevelopment. Project design would also be completed in accordance with the CSU Seismic Requirements. Design and construction in accordance with geotechnical report recommendations and the CSU seismic review process would provide, to the extent feasible, an acceptable level of safety for development and redevelopment. As a result, impacts of the proposed Master Plan associated with potentially unstable geologic units or soils would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Proposed near-term projects could also be subject to liquefaction, seismic-related landslides, and subsidence if not designed appropriately. The CSU Seismic Requirements stipulate that geotechnical investigations are required to assess the potential for all geotechnical hazards, including liquefaction, landslides, and subsidence. The CSU Seismic Requirements also stipulate that all geotechnical reports are peer reviewed to ensure compliance with CSU Seismic Requirements and CBC requirements. With compliance with the CBC, Special Publication 117A (i.e., Seismic Hazard Zonation Program), and the CSU Seismic Requirements, described above, including completion and implementation of a final design level geotechnical report and associated recommendations, implementation of near-term projects would not directly or indirectly cause potential substantial adverse effects related to potentially unstable geologic units or soils and impacts would be **less than significant**.

Impact 4.8-3 **The project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994) and therefore would not create substantial direct or indirect risks to life or property. (Less than Significant)**

Program-Level Analysis for Master Plan

Expansive soils are soils that experience volumetric changes due to cyclical changes in moisture content that over time can lead to damage in foundations, walkways, and utility connections if not designed appropriately. As required by the CBC, all proposed development and redevelopment and associated infrastructure improvements under the proposed Master Plan would be constructed in accordance with the recommendations of a final design level geotechnical report. These recommendations are required by law to be implemented. Design and construction in accordance with geotechnical report recommendations consistent with the most recent version of the CBC would

ensure that proposed improvements would not be susceptible to adverse effects due to expansive soils. As a result, the proposed Master Plan would not create substantial direct or indirect risks to life or property due to expansive soils. Impacts would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Proposed near-term projects could also be subject to adverse effects related to expansive soils if not designed appropriately. The CBC requires that geotechnical investigations are required to assess the potential for all geotechnical hazards, including expansive soils. With compliance with the CBC, the near-term projects would be required to complete a final design level geotechnical report and associated recommendations to address any expansive soils if encountered. Implementation of near-term projects would not directly or indirectly cause potential substantial adverse effects related to expansive soils and impacts would be **less than significant**.

Impact 4.8-4 The project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Potentially Significant)

Program-Level Analysis for Master Plan

No paleontological resources were identified within the proposed Master Plan area as a result of the institutional records search or desktop geological and paleontological review. In addition, the proposed Master Plan area is not anticipated to be underlain by unique geologic features. However, as further described below, the Master Plan area has high paleontological sensitivity at depth, which could result in destruction of a unique paleontological resource during construction.

As set forth by the Society of Vertebrate Paleontology (2010), the paleontological sensitivities for the proposed Master Plan area underlain by Holocene alluvial deposits have low paleontological sensitivity at the surface that increases to high sensitivity with depth, where there is evidence that Pleistocene older alluvial deposits may be contacted, as supported by the Geocon (2003) geotechnical study. The Monterey (Puente) Formation and Topanga Formation have high paleontological sensitivity. Given the proximity of past fossil discoveries in the surrounding area (within an approximately 2-mile radius) from the Puente and Topanga Formations, the proposed Master Plan area is highly sensitive for supporting paleontological resources below the depth of fill and weathered alluvial deposits. If intact paleontological resources are located onsite, ground-disturbing activities associated with construction of a project under this proposed Master Plan, such as grading during site preparation, trenching for utilities, and large diameter augering (2 feet or greater), have the potential to destroy a unique paleontological resource or site. As such, the proposed Master Plan area is considered to be potentially sensitive for paleontological resources, and the potential damage to paleontological resources during construction associated with the proposed Master Plan is considered a **potentially significant impact**.

With the implementation of MM-GEO-1 (Paleontological Resources Impact Mitigation Program), impacts would be reduced to **less than significant**. (See Section 4.8.5, Mitigation Measures, for the full text of this mitigation measure.)

Project-Level Analysis for Near-Term Projects

No paleontological resources were identified within the near-term project sites as a result of the institutional records search or desktop geological and paleontological review. In addition, the near-term project sites are not anticipated to be underlain by unique geologic features. However, near-term projects that consist of new construction (including the new Engineering Graduate Building [Building 14], the new Bronco Mobility Hub [Building 133]) and

infrastructure projects involving excavation at depth have the potential to damage paleontological resources during construction. As indicated previously for the proposed Master Plan, areas of the near-term project sites underlain by Holocene alluvial deposits have low paleontological sensitivity at the surface that increases to high sensitivity with depth, where there is evidence that Pleistocene alluvial deposits may be contacted as evidenced by Geocon's 2003 geotechnical study results, as well as the Monterey (Puente) Formation and Topanga Formation, which have high paleontological sensitivity. Given the proximity of past fossil discoveries in the surrounding area (an approximately 2-mile radius) from the Puente and Topanga Formations, the near-term project sites are also highly sensitive for supporting paleontological resources below the depth of fill and weathered alluvial deposits. If intact paleontological resources are located onsite, ground-disturbing activities associated with construction of near-term projects, such as grading during site preparation for new building construction, trenching for utilities, and large diameter augering (2 feet or greater), have the potential to destroy a unique paleontological resource or site. As such, the near-term project sites are considered to be potentially sensitive for paleontological resources, and the potential damage to paleontological resources during construction associated with the near-term projects is considered a **potentially significant impact**.

With the implementation of MM-GEO-1 (Paleontological Resources Impact Mitigation Program), impacts associated with the near-term projects would be reduced to **less than significant**. (See Section 4.8.5, Mitigation Measures, for the full text of this mitigation measure.)

4.8.4.3 Cumulative Impacts

Impact 4.8-5 **The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to geology, soils, or paleontological resources. (Less than Significant)**

A cumulative impact consists of an impact that is created as a result of the combination of the proposed Master Plan, including near-term projects, evaluated in this EIR, together with other projects causing related impacts. The geologic and soil geographic scope of cumulative impacts is generally the area immediately surrounding the proposed Master Plan area for soils, and in the general region for geology and seismic concerns. Generally, geotechnical hazards are site specific and do not combine to become cumulatively considerable because conditions can vary widely even over short distances. The impacts of the proposed Master Plan related to geology and soils (Impacts 4.8-1 through 4.8-3) are minimized with compliance with existing regulatory requirements, including the CBC and the CSU Seismic Requirements, and these impacts were determined to be less than significant. Most potential impacts related to geology and soil risks of cumulative projects listed in Chapter 4.0, Environmental Analysis, of this EIR (Table 4.0-1 and Figure 4.0-1) would also be minimized due to compliance with existing regulatory requirements, especially the CBC. Adherence to these regulations, which apply to all cumulative projects, minimize potential for risks associated with the geology and soils.

The impacts of the proposed Master Plan related to paleontology (Impact 4.8-4) would be reduced to less than significant with the implementation of MM-GEO-1. Paleontological impacts are localized, generally affecting a specific site area, thus minimizing the potential for an impact to combine with another project to create a cumulative impact. Regardless, cumulative projects would be required to comply with CEQA, and when warranted to address a potentially significant paleontological impact, mitigation measures would be identified to minimize such impacts.

Through compliance with regulatory requirements related to geology and soils, and through mitigation when warranted for paleontological resources, the proposed Master Plan would not have a considerable contribution to any potentially significant cumulative impact related to geology, soils, or paleontological resources. Therefore, the

cumulative impact of the proposed Master Plan related to geology, soils, or paleontological resources would be **less than significant**.

4.8.5 Mitigation Measures

MM-GEO-1 Paleontological Resources Mitigation. Prior to commencement of any ground disturbance (e.g., grading, boring, excavation, digging, trenching, rig anchor installation, drilling, tunneling, auguring, and blasting) that could impact undisturbed native sediments with high paleontological sensitivity, Cal Poly Pomona shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) (2010) guidelines to determine the potential for encountering deposits of paleontological interest. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the project. The PRIMP shall be consistent with the SVP (2010) guidelines and should outline requirements for pre-construction meeting attendance and worker environmental awareness training; where monitoring is required within the project site based on construction plans and/or geotechnical reports; procedures for adequate paleontological monitoring and discoveries treatment; and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. The qualified paleontologist shall attend the pre-construction meeting, and a qualified paleontological monitor shall be on-site during all rough grading and other significant ground-disturbing activities (including augering) in previously undisturbed, fine-grained Pleistocene alluvial deposits, the Miocene Monterey (Puente) Formation, and the Miocene Topanga Formation. Paleontological monitoring shall occur below a depth of 5 feet below the ground surface in areas mapped as Holocene alluvial deposits and from the surface in areas mapped as the Miocene Monterey (Puente) Formation and Miocene Topanga Formation. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will remove the rope and allow grading to recommence in the area of the find. Costs for laboratory processing of fossil specimens and curation fees at the museum are the responsibility of Cal Poly Pomona.

4.8.6 Level of Significance After Mitigation

Implementation of MM-GEO-1 would reduce the potentially significant impact of the proposed Master Plan, including near-term projects, related to paleontological resources (Impact 4.8-5) to **less than significant**.

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4.9 Greenhouse Gas Emissions

The following analysis identifies potential greenhouse gas (GHG) emissions impacts resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing conditions in the proposed Master Plan area, discusses the regulatory setting, evaluates potential GHG impacts, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts. GHG emission model outputs are provided in Appendix B.

No comments related to GHG emissions were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are provided in Appendix A.

4.9.1 Environmental Setting

4.9.1.1 Climate Change Overview

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period (i.e., decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system. Many factors, both natural and human, can cause changes in Earth's energy balance, including variations in the sun's energy reaching Earth, changes in the reflectivity of Earth's atmosphere and surface, and changes in the greenhouse effect, which affects the amount of heat retained by Earth's atmosphere (EPA 2025a).

The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect traps heat in the troposphere through a threefold process as follows: Short-wave radiation emitted by the sun is absorbed by the Earth, the Earth emits a portion of this energy in the form of long-wave radiation, and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward the Earth. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature and creates a pleasant, livable environment on the Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise.

The scientific record of the Earth's climate shows that the climate system varies naturally over a wide range of time scales and that, in general, climate changes prior to the Industrial Revolution in the 1700s can be explained by natural causes such as changes in solar energy, volcanic eruptions, and natural changes in GHG concentrations. Recent climate changes, in particular the warming observed over the past century, however, cannot be explained by natural causes alone. Rather, it is extremely likely that human activities have been the dominant cause of that warming since the mid-twentieth century and is the most significant driver of observed climate change (IPCC 2013; EPA 2025b). Human influence on the climate system is evident from the increasing GHG concentrations in the atmosphere, positive radiative forcing, observed warming, and improved understanding of the climate system (IPCC 2013). The atmospheric concentrations of GHGs have increased to levels unprecedented in the last 800,000 years, primarily from fossil fuel emissions and secondarily from emissions associated with land use changes (IPCC 2013). Continued emissions of GHGs will cause further warming and changes in all components of the climate system, which is discussed further below.

4.9.1.2 Greenhouse Gases

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code, Section 38505(g), for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (see also CEQA Guidelines, Section 15364.5). Some GHGs, such as CO_2, CH_4, and N_2O, occur naturally and are emitted into the atmosphere through natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat -absorption potential than CO_2, include fluorinated gases, such as HFCs, PFCs, and SF_6, which are associated with certain industrial products and processes. The following paragraphs provide a summary of the most common GHGs and their sources.[1]

Carbon Dioxide. CO_2 is a naturally occurring gas and a by-product of human activities and is the principal anthropogenic (i.e., caused by human activity) GHG that affects the Earth's radiative balance. Natural sources of CO_2 include respiration of bacteria, plants, animals, and fungus; evaporation from oceans; volcanic out-gassing; and decomposition of dead organic matter. Human activities that generate CO_2 are the combustion of fuels such as coal, oil, natural gas, and wood and changes in land use.

Methane. CH_4 is produced through both natural and human activities. CH_4 is a flammable gas and is the main component of natural gas. Methane is produced through anaerobic (without oxygen) decomposition of waste in landfills, flooded rice fields, animal digestion, decomposition of animal wastes, production and distribution of natural gas and petroleum, coal production, and incomplete fossil fuel combustion.

Nitrous Oxide. N_2O is produced through natural and human activities, mainly through agricultural activities and natural biological processes, although fuel burning and other processes also create N_2O. Sources of N_2O include soil cultivation practices (microbial processes in soil and water), especially the use of commercial and organic fertilizers, manure management, industrial processes (such as in nitric acid production, nylon production, and fossil-fuel-fired power plants), vehicle emissions, and using N_2O as a propellant (e.g., rockets, racecars, and aerosol sprays).

Fluorinated Gases. Fluorinated gases (also referred to as F-gases) are synthetic powerful GHGs emitted from many industrial processes. Fluorinated gases are commonly used as substitutes for stratospheric ozone-depleting substances (e.g., chlorofluorocarbons, hydrochlorofluorocarbons, and halons). The most prevalent fluorinated gases include the following:

- **Hydrofluorocarbons:** HFCs are compounds containing only hydrogen, fluorine, and carbon atoms. HFCs are synthetic chemicals used as alternatives to ozone-depleting substances in serving many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are used in manufacturing.
- **Perfluorocarbons:** PFCs are a group of human-made chemicals composed of carbon and fluorine only. These chemicals were introduced as alternatives, with HFCs, to the ozone-depleting substances. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Since PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere, these chemicals have long lifetimes, ranging between 10,000 and 50,000 years.

[1] The descriptions of GHGs are summarized from the Intergovernmental Panel on Climate Change (IPCC) Second Assessment Report (1995), IPCC Fourth Assessment Report (2007), CARB's "GHG Inventory Glossary" (CARB 2025a), and EPA's "Overview of Greenhouse Gases (EPA 2025b).

- **Sulfur Hexafluoride:** SF_6 is a colorless gas soluble in alcohol and ether and slightly soluble in water. SF_6 is used for insulation in electric power transmission and distribution equipment, semiconductor manufacturing, the magnesium industry, and as a tracer gas for leak detection.
- **Nitrogen Trifluoride:** Nitrogen trifluoride is used in the manufacture of a variety of electronics, including semiconductors and flat panel displays.

Chlorofluorocarbons. Chlorofluorocarbons are synthetic chemicals that have been used as cleaning solvents, refrigerants, and aerosol propellants. They are chemically unreactive in the lower atmosphere (troposphere) and their production was prohibited in 1987 due to the chemical destruction of stratospheric O_3.

Hydrochlorofluorocarbons. Hydrochlorofluorocarbons are a large group of compounds, whose structure is very close to that of chlorofluorocarbons—containing hydrogen, fluorine, chlorine, and carbon atoms—but including one or more hydrogen atoms. Like HFCs, hydrochlorofluorocarbons are used in refrigerants and propellants. They were also used in place of chlorofluorocarbons for some applications; however, their use in general is being phased out.

Black Carbon. Black carbon is a component of fine particulate matter, which has been identified as a leading environmental risk factor for premature death. It is produced from the incomplete combustion of fossil fuels and biomass burning, particularly from older diesel engines and forest fires. Black carbon warms the atmosphere by absorbing solar radiation, influences cloud formation, and darkens the surface of snow and ice, which accelerates heat absorption and melting. Black carbon is a short-lived species that varies spatially, which makes it difficult to quantify the global warming potential. Diesel particulate matter emissions are a major source of black carbon and are toxic air contaminants that have been regulated and controlled in California for several decades to protect public health. In relation to declining diesel particulate matter from the California Air Resources Board's (CARB's) regulations pertaining to diesel engines, diesel fuels, and burning activities, CARB estimates that annual black carbon emissions in California have reduced by 70% between 1990 and 2010, with 95% control expected by 2020 (CARB 2014).

Water Vapor. The primary source of water vapor is evaporation from the ocean, with additional vapor generated by sublimation (change from solid to gas) from ice and snow, evaporation from other water bodies, and transpiration from plant leaves. Water vapor is the most important, abundant, and variable GHG in the atmosphere and maintains a climate necessary for life.

Ozone. Tropospheric O_3, which is created by photochemical reactions involving gases from both natural sources and human activities, acts as a GHG. Stratospheric O_3, which is created by the interaction between solar ultraviolet radiation and molecular oxygen (O_2), plays a decisive role in the stratospheric radiative balance. Depletion of stratospheric O_3, due to chemical reactions that may be enhanced by climate change, results in an increased ground-level flux of ultraviolet-B radiation.

Aerosols. Aerosols are suspensions of particulate matter in a gas emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light.

4.9.1.3 Global Warming Potential

Gases in the atmosphere can contribute to climate change both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects

atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or albedo [reflection of light from the Earth]) (EPA 2025c). The Intergovernmental Panel on Climate Change (IPCC) developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of a GHG is defined as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram of a trace substance relative to that of 1 kilogram of a reference gas (IPCC 2014). The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO_2 equivalent (CO_2e).

The current version of CalEEMod (version 2022.1) assumes that the GWP for CH_4 is 25 (so emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the IPCC Fourth Assessment Report (IPCC 2007). The GWP values identified in CalEEMod were applied to the proposed Master Plan.

4.9.1.4 Sources of Greenhouse Gas Emissions

Per the EPA Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2022, total United States GHG emissions were approximately 6,343 million metric tons of carbon dioxide equivalent (MMT CO_2e) in 2022 (EPA 2024). Total U.S. emissions have decreased by 3.1% from 1990 to 2022, down from a high of 15.2% above 1990 levels in 2007. Emissions increased from 2021 to 2022 by 0.2% (14.4 MMT CO_2e). Net emissions (i.e., including sinks) were 5,489.3 MMT CO_2e in 2022. Overall, net emissions increased 1.3% from 2021 to 2022 and decreased 16.7% from 2005 levels. From 2021 to 2022, the increase in total GHG emissions was driven largely by an increase in CO_2 emissions from fossil fuel combustion across most end-use sectors due, in part, to increased energy use from the continued rebound of economic activity after the height of the COVID-19 pandemic. The CO_2 emissions from fossil fuel combustion increased by 1.0% from 2021 to 2022 and were 1.1% below emissions in 1990. CO_2 emissions from natural gas use increased by 5.2% (84.80 MMT CO_2e) from 2021, and CO_2 emissions from coal consumption decreased by 6.1% (58.6 MMT CO_2e) from 2021 to 2022 (EPA 2024).

According to California's 2000–2022 GHG emissions inventory (2024 edition), California emitted approximately 371.1 MMT CO_2e in 2022 (CARB 2024). The sources of GHG emissions in California include transportation, industry, electric power production from both in-state and out-of-state sources, residential and commercial activities, agriculture, high GWP substances, and recycling and waste. Table 4.9-1 presents California GHG emission source categories and their relative contributions to the emissions inventory in 2022.

Table 4.9-1. GHG Emissions Sources in California

Source Category	Annual GHG Emissions (MMT CO_2e)[a]	Percent of Total[a]
Transportation	141.0	38%
Industrial	74.2	20%
Electricity[b]	59.4	16%
Residential and commercial uses	40.8	11%
Agriculture and Forestry	29.7	8%
High GWP substances	22.3	6%
Recycling and waste	7.4	2%
Totals	**371.1**	**100%**

Source: CARB 2024.
Notes: GHG = greenhouse gas; GWP = global warming potential; MMT CO_2e = million metric tons of carbon dioxide equivalent. Emissions reflect 2022 California GHG inventory.
[a] Totals may not sum due to rounding.
[b] Includes emissions associated with imported electricity.

In 2022, emissions from statewide emitting activities were 371.1 MMT CO_2e, 9.3 MMT CO_2e (2.4%) lower than 2021 levels. Since the peak level in 2004, California's GHG emissions have generally followed a decreasing trend. In 2014, statewide GHG emissions dropped below the 2020 GHG limit of 431 MMT CO_2e and have remained below the limit since that time (CARB 2024).

Cal Poly Pomona analyzed their GHG inventory for the years 1995 to 2005 (Cal Poly Pomona 2007). The results showed that emissions in 2005 were approximately 64,770 MT CO_2e, reflecting a 17% increase from 1995 due to a growing student population. In 2005, the inventory sources included Energy from On-Campus Stationary Sources (17%), Purchased Electricity (29%), Transportation (52%), Agriculture (1%), Solid Waste (less than 1%), and Refrigerants (less than 1%).

4.9.1.5 Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources through uncertain impacts related to future air temperatures and precipitation patterns. The 2014 IPCC Synthesis Report (IPCC 2014) indicated that warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. Signs that global climate change has occurred include warming of the atmosphere and ocean, diminished amounts of snow and ice, rising sea levels, and ocean acidification (IPCC 2014).

In California, climate change impacts have the potential to affect sea level rise, agriculture, snowpack and water supply, forestry, wildfire risk, public health, frequency of severe weather events, and electricity demand and supply. The primary effect of global climate change has been a rise in average global tropospheric temperature. Global surface temperature in the first two decades of the twenty-first century (2001–2020) was 0.99°C [0.84°C to 1.10°C] higher than 1850–1900 (IPCC 2023). Global surface temperature has increased faster since 1970 than in any other 50-year period over at least the last 2000 years (IPCC 2023). Scientific modeling predicts that continued emissions of GHGs at or above current rates would induce more extreme climate changes during the twenty-first century than were observed during the twentieth century. Human activities, principally through emissions of greenhouse gases, have unequivocally caused global warming, with global surface temperature reaching 1.1°C above 1850–1900 in 2011–2020 (IPCC 2023).

Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. A scientific consensus confirms that climate change is already affecting California. Office of Environmental Health Hazard Assessment identified various indicators of climate change in California, which are scientifically based measurements that track trends in various aspects of climate change. Many indicators reveal discernible evidence that climate change is occurring in California and is having significant, measurable impacts in the state. Changes in the state's climate have been observed including an increase in annual average air temperature, more frequent extreme heat events, more extreme drought, a decline in winter chill, an increase in cooling degree days and a decrease in heating degree days[2], and an increase in variability of statewide precipitation (OEHHA 2022).

Warming temperatures and changing precipitation patterns have altered California's physical systems—the ocean, lakes, rivers and snowpack—upon which the state depends. Winter snowpack and spring snowmelt runoff from the Sierra Nevada and southern Cascade Mountains provide approximately one-third of the state's annual water supply. Impacts of climate on physical systems have been observed such as high variability of snow-water content

[2] Degree days are defined as the number of degrees by which the average daily temperature is higher than 65°F (cooling degree days) or lower than 65°F (heating degree days) based on the assumption that as outside temperature is 65°F results in comfortable indoor temperatures. Degree days reflect changes in climate and are used as a proxy for the energy demand for heating or cooling buildings.

(i.e., amount of water stored in snowpack), decrease in spring snowmelt runoff, glacier change (loss in area), rise in sea levels, increase in average lake water temperature and coastal ocean temperature, and a decrease in dissolved oxygen in coastal waters (OEHHA 2022).

Impacts of climate change on biological systems, including humans, wildlife, and vegetation, have also been observed including climate change impacts on terrestrial, marine, and freshwater ecosystems. As with global observations, species responses include those consistent with warming: elevational or latitudinal shifts in range, changes in the timing of key plant and animal life cycle events, and changes in the abundance of species and in community composition. Humans are better able to adapt to a changing climate than plants and animals in natural ecosystems. Nevertheless, climate change poses a threat to public health as warming temperatures and changes in precipitation can affect vector-borne pathogen transmission and disease patterns in California, as well as the variability of heat-related deaths and illnesses. In addition, since 1950, the area burned by wildfires each year has been increasing.

The California Natural Resources Agency has released four California Climate Change Assessments (in 2006, 2009, 2012, and 2018), which have addressed the following: acceleration of warming across the state, more intense and frequent heat waves, greater riverine flows, accelerating sea level rise, more intense and frequent drought, more severe and frequent wildfires, more severe storms and extreme weather events, shrinking snowpack and less overall precipitation, ocean acidification, hypoxia,[3] and warming. To address local and regional governments' need for information to support action in their communities, the Fourth Assessment (CNRA 2018) includes reports for nine regions of the state, including the Los Angeles Region. Key projected climate changes for the Los Angeles Region include the following (CNRA 2018):

- Continued future warming over the Los Angeles Region. Across the region, average maximum temperatures are projected to increase around 4°F to 5°F by the mid-century, and 5°F to 8°F by the late century.
- Extreme temperatures are also expected to increase. The hottest day of the year may be up to 10°F warmer for many locations across the Los Angeles Region by the late century under certain model scenarios. The number of extremely hot days is also expected to increase across the region.
- Despite small changes in average precipitation, dry and wet extremes are both expected to increase. By the late twenty-first century, the wettest day of the year is expected to increase across most of the Los Angeles Region, with some locations experiencing 25% to 30% increases under certain model scenarios. Increased frequency and severity of atmospheric river events are also projected to occur for this region.
- Sea levels are projected to continue to rise in the future, but there is a large range based on emissions scenario and uncertainty in feedbacks in the climate system. Roughly 1 foot to 2 feet of sea level rise is projected by the mid-century, and the most extreme projections lead to 8 feet to 10 feet of sea level rise by the end of the century.
- Projections indicate that the number of wildfires may increase over Southern California, but there remains uncertainty in quantifying future changes of burned area over the Los Angeles region.

[3] Hypoxia is the state in which oxygen is not available in sufficient amounts at the tissue level to maintain adequate homeostasis.

4.9.2 Regulatory Setting

4.9.2.1 Federal

Massachusetts v. U.S. Environmental Protection Agency

In *Massachusetts v. EPA* (April 2007), the U.S. Supreme Court ruled that CO_2 was a pollutant and directed the EPA administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In making these decisions, the EPA administrator is required to follow the language of Section 202(a) of the Clean Air Act (42 USC 7401 et seq.). On December 7, 2009, the administrator signed a final rule with two distinct findings regarding GHGs under Section 202(a) of the Clean Air Act:

- **Endangerment Finding:** The elevated concentrations of GHGs—CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6—in the atmosphere threaten the public health and welfare of current and future generations. This is referred to as the "endangerment finding."
- **Cause or Contribute Finding:** The combined emissions of GHGs—CO_2, CH_4, N_2O, and HFCs—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is referred to as the "cause or contribute finding."

These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the Clean Air Act.

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (Public Law 110-140) (42 USC 152), among other key measures, would do the following in aiding the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

Federal Vehicle Standards

In 2007, in response to the *Massachusetts v. EPA* decision, the Bush administration issued Executive Order (EO) 13432 directing the EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011 (15 USC 1392–1407); in 2010, the EPA and the NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012 through 2016 (75 FR 25324–25728).

In 2010, President Obama issued a memorandum directing the Department of Transportation, the Department of Energy, the EPA, and the NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the EPA and the NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017 through 2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017 through 2021 (77 FR 62624-63200). On January 12, 2017, the EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks (40 CFR Parts 85, 86, 600; 49 CFR Parts 523, 531, 533, 536, 537).

In 2011, in addition to the regulations applicable to cars and light-duty trucks described above, the EPA and the NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014 through 2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6% to 23% over the 2010 baselines (76 FR 57106–57513).

In August 2016, the EPA and the NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion MT and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program (EPA and NHTSA 2016).

On April 2, 2018, the EPA, under administrator Scott Pruitt, reconsidered the final determination for light-duty vehicles and withdrew its previous 2017 determination, stating that the current standards may be too stringent and therefore should be revised as appropriate (83 FR 16077–16087).

In August 2018, the EPA and the NHTSA proposed to amend certain fuel economy and GHG standards for passenger cars and light trucks and to establish new standards for model years 2021 through 2026. Compared to maintaining the post-2020 standards then in place, the 2018 proposal would increase U.S. fuel consumption by about half a million barrels per day (2% to 3% of total daily consumption, according to the Energy Information Administration) and impact the global climate by 3/1000th of 1°C by 2100 (EPA and NHTSA 2018).

In 2019, the EPA and the NHTSA published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program (84 FR 51310), which revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle (ZEV) mandates in California. In March 2020, Part Two was issued, which set CO_2 emissions standards and Corporate Average Fuel Economy standards for passenger vehicles and light-duty trucks for model years 2021 through 2026.

In response to EO 13990, on December 21, 2021, the NHTSA finalized the Corporate Average Fuel Economy Preemption rule to withdraw its portions of the Part One Rule. The final rule concluded that the Part One Rule overstepped the agency's legal authority and established overly broad prohibitions that did not account for a variety of important state and local interests.

In March 2022, the NHTSA established new fuel economy standards that would require an industry-wide fleet average of approximately 49 miles per gallon for passenger cars and light trucks in model year 2026, by increasing fuel efficiency by 8% annually for model years 2024 and 2025, and 10% annually for model year 2026 (40 CFR Parts 85, 86, 600; 49 CFR Parts 523, 531, 533, 536, 537).

The Inflation Reduction Act of 2022

The Inflation Reduction Act was signed into law by President Biden in August 2022. The act includes specific investment in energy and climate reform and is projected to reduce GHG emissions within the United States by 40% as compared to 2005 levels by 2030. The act allocates funds to boost renewable energy infrastructure (e.g., solar panels and wind turbines), includes tax credits for the purchase of electric vehicles, and includes measures that will make homes more energy efficient.

The Inflation Reduction Act authorized the EPA to implement the Greenhouse Gas Reduction Fund Program, which is a historic, $27 billion investment to mobilize financing and private capital to combat the climate crisis and ensure American economic competitiveness. The Greenhouse Gas Reduction Fund will be designed to achieve the following program objectives: reduce GHG emissions and other air pollutants; deliver the benefits of GHG- and air-pollution-reducing projects to American communities, particularly low-income and disadvantaged communities; and mobilize financing and private capital to stimulate additional deployment of GHG and air-pollution-reducing projects (EPA 2025d).

The Inflation Reduction Act confirms that reduction of GHGs is a core goal of the Clean Air Act and that the funding provided should allow the EPA to increase the scope of its Clean Air Act rulemakings. The act also confirms applicability of the Inflation Reduction Act to GHGs in three specific areas: (1) California's ability to regulate GHG emissions from vehicles, (2) the EPA's authority to regulate methane emissions from oil and gas facilities, and (3) the EPA's authority to regulate GHG emissions from power plants.

4.9.2.2 State

The statewide GHG emissions regulatory framework is summarized in this subsection by category: state climate change targets, building energy, renewable energy and energy procurement, mobile sources, water, solid waste, and other state actions. The following text describes EOs, Assembly Bills (ABs), Senate Bills (SBs), and other plans and policies that would directly or indirectly reduce GHG emissions and/or address climate change issues.

State Climate Change Targets

The state has taken a number of actions to address climate change. These actions are summarized below, and include EOs, legislation, and CARB plans and requirements.

Executive Order S-3-05

Executive Order S-3-05 (June 2005) identified GHG emissions-reduction targets and laid out responsibilities among the state agencies for implementing the EO and for reporting on progress toward the targets. This EO identified the following targets:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80% below 1990 levels.

EO S-3-05 also directed the California Environmental Protection Agency to report biannually on progress made toward meeting the GHG targets and the impacts to California due to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry.

Assembly Bill 32

In furtherance of the goals identified in EO S-3-05, the Legislature enacted AB 32, the California Global Warming Solutions Act of 2006 (California Health and Safety Code Sections 38500–38599). AB 32 provided initial direction on creating a comprehensive multiyear program to limit California's GHG emissions at 1990 levels by 2020, and initiate the transformations required to achieve the state's long-range climate objectives.

Executive Order B-30-15

EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050, as set forth in S-3-05. To facilitate achieving this goal, EO B3015 called for CARB to update the Climate Change Scoping Plan (Scoping Plan) to express the 2030 target in terms of MMT CO_2e. The EO also called for state agencies to continue to develop and implement GHG emission-reduction programs in support of the reduction targets.

Senate Bill 32 and Assembly Bill 197

SB 32 and AB 197 (enacted in 2016) are companion bills. SB 32 (California Health and Safety Code Section 38566) codified the 2030 emissions-reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 (California Health and Safety Code Section 38531) established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, to provide ongoing oversight over implementation of the state's climate policies. AB 197 also added two members of the Legislature to CARB as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and toxic air contaminants from reporting facilities; and requires CARB to identify specific information for GHG emissions-reduction measures when updating the Scoping Plan.

Executive Order B-55-18

EO B-55-18 (September 2018) identified a policy for the state to achieve carbon neutrality as soon as possible (no later than 2045) and achieve and maintain net negative emissions thereafter. The goal is in addition to the existing statewide targets of reducing the state's GHG emissions. CARB will work with relevant state agencies to ensure that future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.

Assembly Bill 1279

The Legislature enacted AB 1279 (California Health and Safety Code Section 38562.2), the California Climate Crisis Act, in September 2022. The bill declares the policy of the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter. Additionally, the bill requires that by 2045, statewide anthropogenic GHG emissions be reduced to at least 85% below 1990 levels.

California Air Resources Board's Climate Change Scoping Plan

One specific requirement of AB 32 is for CARB to prepare a scoping plan to help achieve the maximum technologically feasible and cost-effective GHG emission reductions by 2020 (California Health and Safety Code Section 38561[a]) and to update the plan at least once every 5 years. In 2008, CARB approved the first scoping plan: The Climate Change Proposed Scoping Plan: A Framework for Change (Scoping Plan). The Scoping Plan included a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission-reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the state's long-range climate objectives.

CARB adopted the 2022 Scoping Plan Update in December 2022. The 2022 CARB Scoping Plan Update outlines the state's plan to reach carbon neutrality by 2045 or earlier, while also assessing the progress the state is making toward achieving GHG reduction goals by 2030. Per the Legislative Analyst's Office, the 2022 CARB Scoping Plan identifies a more aggressive 2030 GHG goal. As it relates to the 2030 goal, perhaps the most significant change in the 2022 plan (as compared to previous Scoping Plans) is that it identifies a new GHG target of 48% below the 1990 level, compared to the current statutory goal of 40% below. Current law requires the state to reduce GHG emissions by at least 40% below the 1990 level by 2030 but does not specify an alternative goal. According to CARB, a focus on the lower target is needed to put the state on a path to meeting the newly established 2045 goal, consistent with the overall path to 2045 carbon neutrality. The carbon neutrality goal requires CARB to expand proposed actions from only the reduction of anthropogenic sources of GHG emissions to also include those that capture and store carbon (e.g., through natural and working lands, or mechanical technologies). The carbon reduction programs build on and accelerate those currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel-fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen (CARB 2022).

The 2022 CARB Scoping Plan Update also emphasizes that there is no realistic path to carbon neutrality without carbon removal and sequestration, and to achieve the state's carbon neutrality goal, carbon reduction programs must be supplemented by strategies to remove and sequester carbon. Strategies for carbon removal and sequestration include carbon capture and storage from anthropogenic point sources, where CO_2 is captured as it leaves a facility's smokestack and is injected into geologic formations or used in industrial materials (e.g., concrete); and carbon dioxide removal from ambient air, through mechanical (e.g., direct air capture with sequestration) or nature-based (e.g., management of natural and working lands) applications.

The 2022 CARB Scoping Plan Update details "Local Actions" in Appendix D. The Appendix D Local Actions include recommendations to build momentum for local government actions that align with the state's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under CEQA. The recommendations provided in Appendix D are non-binding (i.e., not regulatory) and should not be interpreted as a directive to local governments, but rather as evidence-based analytical tools to assist local governments with their role as essential partners in achieving California's climate goals.

Appendix D recognizes consistency with a CEQA-qualified GHG reduction plan such as a Climate Action Plan as a first option for evaluating potential GHG emission impacts under CEQA. Absent a qualified GHG reduction plan, for residential and mixed-use projects, Appendix D provides a second option for evaluating project consistency with recommendations for key attributes that projects should achieve that would align with the state's climate goals.

These key attributes include electric vehicle (EV) charging infrastructure, infill location, no loss or conversion of natural and working lands, transit-supportive densities or proximity to transit stops, reducing parking requirements, provision of affordable housing (at least 20% of units), no net loss of existing affordable units, and all electric appliances with no natural gas connection (CARB 2022). Projects that achieve all key attributes are considered "clearly consistent" with the state's climate and housing goals, since these attributes address the largest sources of operational emissions for residential and mixed-use projects. According to the 2022 CARB Scoping Plan Update, in general, residential and mixed-use projects that incorporate all these attributes are aligned with the state's priority GHG reduction strategies for local climate action as shown on Table 1 of the 2022 CARB Scoping Plan Update, as well as with the state's climate and housing goals. Such projects are considered consistent with the Scoping Plan; therefore, the GHG emissions associated with such projects generally result in a less than significant GHG impact under CEQA (CARB 2022b). Additionally, the 2022 CARB Scoping Plan Update states that lead agencies under CEQA "may determine, with adequate additional supporting evidence, that projects that incorporate some, but not all, of the key project attributes are consistent with the State's climate goals" (CARB 2022).

The above is CARB's recommended approach for evaluating significance of GHG impacts for residential and mixed-use development projects (CARB 2022). However, alternative approaches to evaluating project-level alignment with state climate goals are also provided at Appendix D. Lead agencies under CEQA can make a significance determination based on whether the project would result in net zero GHG emissions and whether the project is consistent with a significance determination/threshold recommended by the applicable air district or other lead agencies (CARB 2022). Appendix D acknowledges, however, that net zero may not be feasible or appropriate for every project (CARB 2022).

Building Energy

California Code of Regulations, Title 24, Part 6

The California Building Standards Code was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established Building Energy Efficiency Standards that are designed to ensure that new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every 3 years by the Building Standards Commission and the California Energy Commission (CEC) and revised if necessary (California Public Resources Code Section 25402[b][1]). The regulations receive input from members of industry, as well as the public, to "reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (California Public Resources Code Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California Public Resources Code Section 25402[d]) and cost effectiveness (California Public Resources Code Section 25402[b][2–3]). As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The current Title 24, Part 6 standards, referred to as the 2022 Title 24 Building Energy Efficiency Standards, became effective on January 1, 2023. The 2022 Energy Code focuses on four key areas in newly constructed homes and businesses quality (CEC 2021):

- Encouraging electric heat pump technology for space and water heating, which consumes less energy and produces fewer emissions than gas-powered units.
- Establishing electric-ready requirements for single-family homes to position owners to use cleaner electric heating, cooking, and EV charging options whenever they choose to adopt those technologies.

- Expanding solar photovoltaic (PV) system and battery storage standards to make clean energy available on site and complement the state's progress toward a 100% clean electricity grid.
- Strengthening ventilation standards to improve indoor air quality.

If approved, the 2025 Title 24 Standards will be effective on January 1, 2026. The 2025 Draft Energy Code introduces new areas compared to the 2022 Title 24 standards, including a stronger emphasis on electric heat pumps for space and water heating in new buildings. It also establishes electric-ready requirements for commercial kitchens and some multifamily buildings, mandates the replacement of end-of-life rooftop HVAC units with high-efficiency systems, and updates solar and storage standards for assembly buildings (CEC 2024).

California Code of Regulations, Title 24, Part 11

In addition to CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24), which is commonly referred to as California's Green Building Standards (CALGreen), establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial, low-rise residential and state-owned buildings and schools and hospitals. The 2022 CALGreen standards are the current applicable standards. For nonresidential projects, some of the key mandatory CALGreen 2022 standards involve requirements related to bicycle parking, designated parking for clean air vehicles, EV charging stations for passenger vehicles, medium heavy-duty and heavy-duty trucks, shade trees, water conserving plumbing fixtures and fittings, outdoor potable water use in landscaped areas, recycled water supply systems, construction waste management, excavated soil and land clearing debris, and commissioning (24 CCR, Part 11).

Renewable Energy and Energy Procurement

Senate Bill 1078, Senate Bill 1368, Executive Order S-14-08, Executive Order S-21-09 and Senate Bill X1-2, and Senate Bill 1020

SB 1078 (2002) (California Public Utilities Code Section 399.11 et seq.) established the Renewables Portfolio Standard program, which required an annual increase in renewable generation by the utilities equivalent to at least 1% of sales, with an aggregate goal of 20% by 2017. This goal was subsequently accelerated, requiring utilities to obtain 20% of their power from renewable sources by 2010 (see SB 107, EO S-14-08, and EO S-21-09).

SB 1368 (2006), required CEC to develop and adopt regulations for GHG emission performance standards for the long-term procurement of electricity by local publicly owned utilities (California Public Utilities Code Sections 8340-8341). These standards must be consistent with the standards adopted by the California Public Utilities Commission (CPUC).

EO S-14-08 (2008) focused on the contribution of renewable energy sources to meet the electrical needs of California while reducing the GHG emissions from the electrical sector. This EO required that all retail suppliers of electricity in California serve 33% of their load with renewable energy by 2020. Furthermore, the EO directed state agencies to take appropriate actions to facilitate reaching this target. The California Natural Resources Agency, in collaboration with CEC and the California Department of Fish and Wildlife, was directed to lead this effort.

EO S-21-09 (2009) directed CARB to adopt a regulation consistent with the goal of EO S14-08 by July 31, 2010. CARB was further directed to work with CPUC and CEC to ensure that the regulation builds upon the Renewable Portfolio Standard program and was applicable to investor-owned utilities, publicly owned utilities, direct access providers, and community choice providers. Under this order, CARB was to give the highest priority to those renewable resources that provide the greatest environmental benefits with the least environmental costs and impacts on public health, and those that can be developed the most quickly in support of reliable, efficient, cost-effective electricity system operations. On September 23, 2010, CARB initially approved regulations to implement a Renewable Electricity Standard; however, this regulation was not finalized because of subsequent legislation (SB X1-2) signed by Governor Brown in April 2011 (California Public Resources Code Section 25354[l]).

SB X1-2 (April 2011) expanded Renewable Portfolio Standard by establishing a renewable energy target of 20% of the total electricity sold to retail customers in California per year by December 31, 2013, and 33% by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation (30 megawatts or less), digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location. SB X1-2 applies to all electricity retailers in the state, including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. All these entities must meet the renewable energy goals listed above.

SB 350 (2015) further expanded the Renewable Portfolio Standard program by establishing a goal of 50% of the total electricity sold to retail customers in California per year by December 31, 2030 (California Public Utilities Code Section 454.51). In addition, SB 350 included the goal to double the energy efficiency savings in electricity and natural gas final end uses (such as heating, cooling, lighting, or class of energy uses on which an energy efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also requires CPUC, in consultation with CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal.

SB 100 (2018) increased the standards set forth in SB 350, establishing that 44% of the total electricity sold to retail customers in California per year by December 31, 2024; 52% by December 31, 2027; and 60% by December 31, 2030, be secured from qualifying renewable energy sources (California Public Utilities Code Sections 399.11, 399.15, 399.30). SB 100 states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California. This bill requires that the achievement of 100% zero-carbon electricity resources do not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

SB 1020 (September 2022) revises the standards from SB 100, requiring the following percentage of retail sales of electricity to California end-use customers to come from eligible renewable energy resources and zero-carbon resources: 90% by December 31, 2035; 95% by December 31, 2040; and 100% by December 31, 2045 (California Government Code Section 7921.505; California Health and Safety Code Section 38561; California Public Utilities Code Sections 454.53, 583, 454.59, 739.13).

Mobile Sources

State Vehicle Standards (Assembly Bill 1493 and Executive Order B-16-12)

AB 1493 (July 2002) was enacted in response to the transportation sector accounting for a large share of California's CO_2 emissions (California Health and Safety Code Section 43018.5). AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by CARB to be

vehicles that are primarily used for noncommercial personal transportation in the state. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. EO B-16-12 (March 2012) required that state entities under the governor's direction and control support and facilitate the rapid commercialization of ZEVs. It ordered CARB, CEC, CPUC, and other relevant agencies to work with the Plug-In Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to help achieve benchmark goals by 2015, 2020, and 2025. On a statewide basis, EO B-16-12 identified a target reduction of GHG emissions from the transportation sector equaling 80% less than 1990 levels by 2050. This directive did not apply to vehicles that have special performance requirements necessary for the protection of the public safety and welfare. As explained under the "Federal Vehicle Standards" description above, EPA and NHTSA approved the SAFE Vehicles Rule Part One and Two, which revoked California's authority to set its own GHG emissions standards and set ZEV mandates in California.

As also explained under the Federal subsection above, in March 2022, EPA reinstated California's authority under the Clean Air Act to implement its own GHG emission standards and ZEV sales mandate. EPA's action concludes its reconsideration of the 2019 SAFE-1 rule by finding that the actions taken under the previous administration as a part of SAFE-1 were decided in error and are now entirely rescinded.

Heavy-Duty Diesel

CARB adopted the final Heavy-Duty Truck and Bus Regulation on December 31, 2014, to reduce diesel particulate matter, a major source of black carbon, and oxides of nitrogen emissions from heavy-duty diesel vehicles (13 CCR, Part 2025). The rule requires that diesel particulate matter filters be applied to newer heavier trucks and buses by January 1, 2012, with older vehicles required to comply by January 1, 2015. The rule will require nearly all diesel trucks and buses to be compliant with the 2010 model year engine requirement by January 1, 2023. CARB also adopted an Airborne Toxics Control Measure to limit idling of diesel-fueled commercial vehicles on December 12, 2013. This rule requires diesel-fueled vehicles with gross vehicle weights greater than 10,000 pounds to idle no more than 5 minutes at any location (13 CCR, Part 2485).

Executive Order S-1-07

EO S-1-07 (January 2007, implementing regulation adopted in April 2009) sets a declining Low Carbon Fuel Standard for GHG emissions measured in CO_2e grams per unit of fuel energy sold in California. The target of the Low Carbon Fuel Standard is to reduce the carbon intensity of California passenger vehicle fuels by at least 10% by 2020 (17 CCR 95480 et seq.). The carbon intensity measures the amount of GHG emissions in the lifecycle of a fuel—including extraction/feedstock production, processing, transportation, and final consumption—per unit of energy delivered.

Senate Bill 375

SB 375 (California Government Code Section 65080) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 requires CARB to adopt regional GHG -reduction targets for the automobile and light-truck sector for 2020 and 2035, and to update those targets every 8 years. SB 375 requires the state's 18 regional metropolitan planning organizations (MPOs) to prepare a sustainable communities strategy (SCS) as part of their Regional Transportation Plan (RTP) that will achieve the GHG reduction targets set by CARB. If an MPO is unable to devise an SCS to achieve the GHG reduction target, the MPO must prepare an alternative planning strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

An SCS does not (1) regulate the use of land; (2) supersede the land use authority of cities and counties; or (3) require that a city's or county's land use policies and regulations, including those in a General Plan, be consistent with it (California Government Code Section 65080[b][2][K]). Nonetheless, SB 375 makes regional and local planning agencies responsible for developing those strategies as part of the federally required metropolitan transportation planning process and the state-mandated housing element process. Unlike AB 32, the California Global Warming Solutions Act of 2006, with its market mechanisms that generate cap-and-trade auction proceeds to the state for reinvestment, SB 375 does not provide any new financial resources to make the production and preservation of affordable homes near transit feasible (California Housing Partnership Corporation and TransForm 2014)

Advanced Clean Cars Program and Zero-Emission Vehicle Program

The Advanced Clean Cars (ACC) I program (2012) is an emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package of regulations: the Low-Emission Vehicle regulation for criteria air pollutant and GHG emissions and a technology forcing regulation for ZEVs that contributes to both types of emission reductions (CARB 2025b). The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars. To improve air quality, CARB has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that in 2025 cars will emit 75% less smog-forming pollution than the average new car sold in 2015. The ZEV program will act as the focused technology of the ACC I program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid EVs in the 2018 to 2025 model years.

The ACC II program, which was adopted in August 2022, established the next set of Low-Emission Vehicle and ZEV requirements for model years after 2025 to contribute to meeting federal ambient air quality ozone standards and California's carbon neutrality standards (CARB 2025b). The main objectives of ACC II are as follows:

- Maximize criteria and GHG emission reductions through increased stringency and real-world reductions.
- Accelerate the transition to ZEVs through both increased stringency of requirements and associated actions to support wide-scale adoption and use.

The ACC II rulemaking package also considers technological feasibility, environmental impacts, equity, economic impacts, and consumer impacts.

Executive Order N-79-20

EO N-79-20 (2020) requires CARB to develop regulations as follows: (1) Passenger vehicle and truck regulations requiring increasing volumes of new ZEVs sold in the state toward the target of 100% of in-state sales by 2035; (2) medium- and heavy-duty vehicle regulations requiring increasing volumes of new zero-emission trucks and buses sold and operated in the state toward the target of 100% of the fleet transitioning to ZEVs by 2045 everywhere feasible and for all drayage trucks to be zero emission by 2035; and (3) strategies, in coordination with other state agencies, the EPA, and local air districts, to achieve 100% zero emissions from off-road vehicles and equipment operations in the state by 2035. EO N-79-20 called for the development of a ZEV Market Development Strategy, which was released February 2021, to be updated every 3 years, that ensures coordination and implementation of the EO and outlines actions to support new and used ZEV markets. In addition, the EO specifies identification of near-term actions, and investment strategies, to improve clean transportation, sustainable freight, and transit options; and calls for development of strategies, recommendations, and actions

by July 15, 2021, to manage and expedite the responsible closure and remediation of former oil extraction sites as the state transitions to a carbon-neutral economy.

Advanced Clean Trucks Regulation

The Advanced Clean Trucks Regulation was also approved by CARB in 2020 (CCR Title 13 Division 3 Chapter 1 Article 2, Sections 1963-1963.5). The purpose of the Advanced Clean Trucks Regulation is to accelerate the market for ZEVs in the medium- and heavy-duty truck sector and to reduce air pollutant emissions generated from on-road mobile sources (CARB 2021b). The regulation has two components, (1) a manufacturer sales requirement and (2) a reporting requirement:

- **Zero-emission truck sales:** Manufacturers who certify Class 2b–8 chassis or complete vehicles with combustion engines will be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55% of Class 2b–3 truck sales, 75% of Class 4–8 straight truck sales, and 40% of truck tractor sales.
- **Company and fleet reporting:** Large employers including retailers, manufacturers, brokers, and others will be required to report information about shipments and shuttle services. Fleet owners with 50 or more trucks will be required to report about their existing fleet operations. This information will help identify future strategies to ensure that fleets purchase available zero-emission trucks and place them in service where suitable to meet their needs.

Water

Senate Bill X7-7

SB X7-7, or the Water Conservation Act of 2009 (CCR Title 23, Division 2, Chapter 5.1), required that all water suppliers increase their water use efficiency with an overall goal of reducing per capita urban water use by 20% by December 31, 2020. Each urban water supplier was required to develop water use targets to meet this goal.

Executive Order B-29-15

In response to the ongoing drought in California, EO B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25% relative to water use in 2013. The term of the EO extended through February 28, 2016, although many of the directives have become permanent water-efficiency standards and requirements. The EO includes specific directives that set strict limits on water usage in the state. In response to EO B-29-15, the California Department of Water Resources has modified and adopted a revised version of the Model Water Efficient Landscape Ordinance (California Building Code Title 24, Part 11 Chapters 4 and 5) that, among other changes, significantly increases the requirements for landscape water use efficiency and broadens its applicability to include new development projects with smaller landscape areas.

Executive Order N-10-21

In response to a state of emergency due to severe drought conditions, EO N-10-21 (July 2021) called on all Californians to voluntarily reduce their water use by 15% from their 2020 levels. Actions suggested in EO N-10-21 include reducing landscape irrigation, running dishwashers and washing machines only when full, finding and fixing leaks, installing water-efficient showerheads, taking shorter showers, using a shut-off nozzle on hoses, and taking cars to commercial car washes that use recycled water.

Solid Waste

Assembly Bill 939, Assembly Bill 341, Assembly Bill 1826, and Senate Bill 1383

In 1989, AB 939, known as the Integrated Waste Management Act (California Public Resources Code Section 40000 et seq.), was passed because of the increase in waste stream and the decrease in landfill capacity. The statute established the California Integrated Waste Management Board (replaced in 2010 by the California Department of Resources Recycling and Recovery [CalRecycle]), which oversees a disposal reporting system. AB 939 mandated a reduction of waste being disposed where jurisdictions were required to meet diversion goals of all solid waste through source reduction, recycling, and composting activities of 25% by 1995 and 50% by the year 2000.

AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75% of solid waste generated be source-reduced, recycled, or composted by the year 2020, and annually thereafter. In addition, AB 341 required CalRecycle to develop strategies to achieve the state's policy goal. CalRecycle has conducted multiple workshops and published documents that identify priority strategies that it believes would assist the state in reaching the 75% goal by 2020.

AB 1826 (Chapter 727, Statutes of 2014, effective 2016 [California Public Resources Code Division 30, Section 42649.8]) requires businesses to recycle their organic waste (i.e., food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste) depending on the amount of waste they generate per week. This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units. The minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply. As of September 2020, the threshold for businesses generating more than two cubic yards of commercial solid waste per week must utilize organic waste collection services.

SB 1383 (2016) (CCR Article 3 Section 1894-18984.3, 18984.5) requires a 50% reduction in organic waste disposal from 2014 levels by 2020 and a 75% reduction by 2025—essentially requiring the diversion of up to 27 million tons of organic waste—to reduce GHG emissions. SB 1383 also requires that not less than 20% of edible food that is currently disposed be recovered for human consumption by 2025.

Other State Actions

Senate Bill 97

SB 97 (2007) directed the Governor's Office of Planning and Research and the California Natural Resources Agency to develop guidelines under CEQA for the mitigation of GHG emissions. The California Natural Resources Agency adopted the CEQA Guidelines amendments in December 2009, which became effective in March 2010.

Under the amended CEQA Guidelines, a lead agency has the discretion to determine whether to use a quantitative or qualitative analysis or apply performance standards to determine the significance of GHG emissions resulting from a particular project (14 CCR 15064.4[a]). The CEQA Guidelines require a lead agency to consider the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]). The CEQA Guidelines also allow a lead agency to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in

emissions through the implementation of project features or off-site measures (14 CCR 15126.4[c]). The adopted amendments do not establish a GHG emission threshold, instead allowing a lead agency to develop, adopt, and apply its own thresholds of significance or those developed by other agencies or experts. The California Natural Resources Agency also acknowledged that a lead agency could consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project's GHG emissions (CNRA 2009).

With respect to GHG emissions, CEQA Guidelines Section 15064.4(a), as subsequently amended in 2018, states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Guidelines now note that an agency "shall have discretion to determine, in the context of a particular project, whether to: (1) Quantify greenhouse gas emissions resulting from a project; and/or (2) Rely on a qualitative analysis or performance-based standards" (14 CCR 15064.4[a]). Section 15064.4(b) states that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment: (1) the extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]).

Executive Order S-13-08

EO S-13-08 (November 2008) is intended to hasten California's response to the impacts of global climate change, particularly sea level rise. Therefore, the EO directs state agencies to take specified actions to assess and plan for such impacts. The final 2009 California Climate Adaptation Strategy report was issued in December 2009, and an update, Safeguarding California: Reducing Climate Risk, followed in July 2014. To assess the state's vulnerability, the report summarizes key climate change impacts to the state for the following areas: agriculture, biodiversity and habitat, emergency management, energy, forestry, ocean and coastal ecosystems and resources, public health, transportation, and water. Issuance of Safeguarding California: Implementation Action Plans followed in March 2016. In January 2018, The California Natural Resources Agency released the Safeguarding California Plan: 2018 Update, which communicates current and needed actions that state government should take to build climate change resiliency.

California State University

California State University Sustainability Policy

CSU has identified sustainability as a system-wide priority, as detailed in the CSU Sustainability Policy, which was adopted in 2014 and was last updated in 2024. The CSU Sustainability Policy focuses mainly on energy and GHG emissions, and largely aligns with the State of California's energy and GHG emissions reduction goals (CSU 2024). The policy aims to reduce the environmental impact of construction and operation of buildings and to integrate sustainability across the curriculum. Table 4.9-2 includes a summary of the CSU Sustainability Policy and associated goals.

Table 4.9-2 CSU Sustainability Policy

University Sustainability
1. The CSU will develop employee and student workforce skills in the green jobs industry, promote the development of sustainable products and services, and foster economic development.
2. The CSU will seek to further integrate sustainability into the academic curriculum.
3. The CSU will pursue sustainable practices in all areas of the university.
4. Each CSU is encouraged to designate a sustainability officer responsible for campus sustainability programs.
Climate Action Plan
1. The CSU will strive to reduce system-wide facility greenhouse gas (GHG) emissions to 40% below 1990 levels consistent with AB 32, California's Global Warming Solutions Act of 2006.
2. The CSU will strive to reduce facility GHG emissions to 80% below 1990 levels by 2040, and achieve carbon neutrality by 2045 in accordance with statewide mandates.
3. The CSU will encourage and promote the use of alternative transportation and/or alternative fuels.
Energy Resilience and Procurement
1. The CSU shall pursue energy procurement and production. The CSU shall endeavor to increase its self-generated energy capacity from 32 to 80 megawatts (MW) by 2030.
2. The CSU will consider cost-effective opportunities to exceed the State of California and CPUC Renewable Portfolio Standard sooner than the established goal of procuring 60% of its electricity needs from renewable sources by 2030 consistent with SB 100.
3. The CSU will endeavor to exceed the State of California and CPUC Renewable Portfolio Standard sooner than the established goal of procuring 60% of its electricity needs from renewable sources by 2030 consistent with SB 100.
4. Campuses will transition from fossil-fuel sourced equipment to electric equipment as replacements or renovations are needed. Any in-kind fossil-fuel-sourced equipment will be justified through an analysis which demonstrates why that solution represents the most cost-effective option and what alternatives were analyzed for comparative purposes. No new investment in, or renewal of, natural gas assets or infrastructure as part of campus projects starting July 1, 2035, with the exception of critical academic program needs.
Energy Conservation and Utility Management
1. All CSU buildings and facilities will be operated in the most energy-efficient manner.
2. All CSU campuses will continue to identify energy efficiency improvement measures to the greatest extent possible.
3. The CSU will cooperate with federal, state, and local governments and other appropriate organizations in accomplishing energy conservation and utilities management objectives throughout the state.
4. Each CSU campus will designate an energy/utilities manager with the responsibility and the authority for carrying out energy conservation and utilities management programs.
5. The CSU will monitor monthly energy and utility usage on all campuses and will prepare a system-wide annual report on energy utilization and GHG emissions.
6. Each CSU campus is encouraged to develop and maintain an integrated strategic energy resource plan.
Water Conservation
1. All CSU campuses will pursue water resource conservation to reduce water consumption by 10% by 2030 consistent by AB 1668, including such steps to develop sustainable landscaping, reduce turf, install controls to optimize irrigation water use, reduce water usage in restrooms and showers, and promote the use of reclaimed/recycled water.
Waste Management
1. Campuses shall seek to reduce the rate of landfill bound waste to 50% of total campus waste by 2030, divert at least 80% by 2040, and move toward zero waste.
2. The CSU will encourage the reduction of hazardous waste while supporting the academic program.

Table 4.9-2 CSU Sustainability Policy

Sustainable Procurement
1. Campuses will promote use of suppliers and/or vendors who reduce waste and re-purpose recycled material.
2. Campus practices should encourage use of products that minimize waste sent to landfills or incinerators, participate in the CalRecycle Buy-Recycled program or equivalent, and increase recycled content purchases in all Buy-Recycled program product categories.
3. Campuses shall continue to report on and track all recycled content product categories.
4. Campuses shall align procedures with state initiatives to report environmental product declarations for select construction materials.
5. Promote circular economies by seeking to reduce waste when considering materials purchases such as office/classroom supplies or equipment by minimizing purchase of items with a short useful life, are unable to be recycled, and/or are made of unsustainable or carbon intensive materials.
Sustainable Food Service
1. Campuses shall strive to increase their sustainable food purchases to 20% of total food budget by 2020.
2. Campuses shall collaborate to provide information and/or training on sustainable food service operations.
Sustainable Building Practices
1. All future CSU new construction, remodeling, renovation, and repair projects will be designed with consideration of optimum energy utilization, low life cycle operating costs, and compliance with all applicable energy regulations.
2. Capital Planning, Design and Construction in the Chancellor's Office shall monitor building sustainability/energy performance, based on Leadership in Energy and Environmental Design (LEED) principles.
3. Existing building energy performance will be optimized through improved operation, maintenance and repair, and capital improvement, enabling campuses to meet carbon reduction goals.
4. The CSU shall design and build all new buildings and major renovations to meet or exceed the minimum requirements equivalent to LEED "Silver."
Physical Plant Management
1. Each campus shall operate and maintain a comprehensive energy management system.
2. Campus energy/utilities managers will make the necessary arrangements to achieve optimum efficiency in the use of natural gas, electricity, or any other purchased energy resources to meet the heating, cooling, and lighting needs of facilities, striving to adhere to statewide energy efficiency guidance regarding appropriate indoor temperature setpoints. Simultaneous heating and cooling operations to maintain specific temperatures in work areas will not be allowed unless special operating conditions dictate them.
3. To the extent possible, programs will be consolidated to achieve the highest building utilization.
4. All CSU campuses will implement a utilities chargeback system to recover direct and indirect costs of utilities.
Transportation
1. The CSU will encourage and promote the use of alternative transportation and/or alternative fuels for university-associated transportation, including commuter and business travel.
2. CSU campuses shall develop and maintain a transportation demand management (TDM) plan, updated every five years, to reduce Vehicle Miles Traveled (VMT) and carbon emissions.
3. Campuses shall strive to increase EV, e-bike, and other electric mobility and transportation device charging infrastructure and incentive programs.
4. Campuses shall strive to develop and maintain a long-range plan for transitioning fleet and ground equipment to zero emissions. 50% of all light-duty vehicle purchases will be ZEV by 2025, with no addition of gas-powered light-duty vehicles to the fleet after 2035. All small off-road engine equipment used for campus grounds will be electric by 2035. All buses and heavy-duty vehicles will be ZEV by 2045.

Source: CSU 2024.

Under the CSU Sustainability Policy, campuses are responsible for quantifying and reducing their Scope 1 and 2 emissions to reach the 2020 and 2040 goals. Scope 1 emissions are direct emissions (e.g., combustion of fossil fuels, fleet vehicles, agriculture operations, use of refrigerants). Scope 2 emissions are emissions from purchased utilities (e.g., electricity, water).

Executive Order 987

CSU Executive Order 987 is the CSU Policy Statement on Energy Conservation, Sustainable Building Practices, and Physical Plant Management. Cal Poly Pomona operates under this Executive Order, which sets minimum efficiency standards for new construction and renovations, and establishes operating practices intended to ensure CSU buildings are used in the most energy-efficient and sustainable manner possible while still meeting the programmatic needs of the University.

Cal Poly Pomona Climate Action Plan

The Cal Poly Pomona Climate Action Plan guides the university's efforts to reach carbon neutrality. It provides targets for achieving climate neutrality by 2030 through a combination of local and off-site actions and specifies a process for making progress toward that goal (Cal Poly Pomona 2009). Key targets and strategies of the plan that are relevant to the analysis in this section include the following:

1. Reduce GHG Emissions Associated with Travel
    a. Aggressive Carpooling Program – Increase total % of carpoolers across all sectors
    b. Mass Transit Program – Increase total % of transit riders across all sectors
    c. University Fleet Improvements - Eliminate gas-powered and conventional diesel vehicles, in favor of increases in electric, natural gas and biodiesel
    d. University Air Travel – Offset 25% of University-sponsored faculty/staff/student/administrator air travel
2. Reduce Trips/Vehicle Miles Traveled (VMT)
    a. Increase on-campus residential population
    b. Increase near-campus housing for faculty/staff
    c. Increase online/hybrid course offerings and efficient scheduling to reduce student trips to campus
    d. Faculty/Staff alternative scheduling
3. Reduce Energy Demand on Campus
    a. Renovate 25% existing campus square footage and/or exterior lighting to reduce energy consumption
    b. Increase energy efficiency/mitigation in new buildings
    c. Implement behavioral programs, energy star purchasing and plug load management to reduce electricity demand
    d. Space use efficiency program – Reduce the need to add new buildings through more efficient space use and building renovation for flexibility
4. Change Energy Mix to Reduce Greenhouse Gas Emissions
    a. Reduce Natural Gas usage by 6.25% through on-site solar thermal
    b. GHG Free sources constitute 33% of electricity purchases via on-site production, agreements or RECs
5. Agricultural/Landscape Operations and Solid Waste
    a. Reduce Solid Waste by 50% through aggressive recycling/awareness programs

b. Practice Conservation Tillage on 25% of agricultural land
c. Reduce synthetic fertilizer usage by 33%; replace with aggressive composting program to increase organic fertilizer by 33%
d. Increase Carbon Sequestration on campus by 50%

4.9.2.3 Local

As a state entity, Cal Poly Pomona is not subject to local government permitting or regulations, policies, or ordinances, such as the general plans and ordinances for the City of Pomona, City of Walnut, or the County of Los Angeles. Because Cal Poly Pomona is not subject to local general plans or other local land use plans and/or ordinances, these regulations are not summarized here or further analyzed in this section. However, information about regional agencies involved in CEQA review and related regional planning is provided below.

South Coast Air Quality Management District

Air districts typically act in an advisory capacity to local governments in establishing the framework for environmental review of air pollution impacts under CEQA. This may include recommendations regarding significance thresholds, analytical tools to estimate emissions and assess impacts, and mitigations for potentially significant impacts. Although air districts will also address some of these issues on a project-specific basis as responsible agencies, they may provide general guidance to local governments on these issues (SCAQMD 2008).

Southern California Association of Governments

As noted above, California's 18 MPOs have been tasked with creating SCSs in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing, and environmental planning. Pursuant to SB 375, CARB set per capita GHG emissions reduction targets from passenger vehicles for each of the state's 18 MPOs. For the Southern California Association of Governments (SCAG), the state's initial mandated reductions were set at 8% by 2020 and 13% by 2035. In March 2018, CARB updated the SB 375 targets for SCAG to require 8% reduction by 2020 and a 19% reduction by 2035 in per capita passenger vehicle GHG emissions.

Pursuant to Government Code Section 65080(b)(2)(B), the SCS must "set forth forecasted development pattern for the region which when integrated with the transportation network, and other transportation measures and policies, will reduce the GHG emissions from automobiles and light trucks to achieve the GHG reduction targets." To that end, at the time of this Draft EIR, SCAG adopted the 2024-2050 RTP/SCS, also referred to as "Connect SoCal 2024." The Connect SoCal 2024-2050 builds upon prior planning cycles to update the vision of the region's future (SCAG 2024). SCAG's Connect SoCal 2024–2050 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS is a regional growth management strategy, which targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region pursuant to SB 375. In addition to demonstrating the region's ability to attain the GHG emission-reduction targets set forth by CARB, the 2024–2050 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands (SCAG 2024). Thus, successful implementation of the 2024–2050 RTP/SCS would result in more complete communities with various transportation and housing choices while reducing automobile use. The RTP/SCS identifies the following strategy

areas to support its environmental goals: Sustainable Development, Air Quality, Clean Transportation, Natural and Agricultural Lands Preservation, and Climate Resilience.

4.9.3 Thresholds of Significance and Methodology

4.9.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section15064.7). The significance criteria used to evaluate the proposed Master Plan's GHG impacts are based on CEQA Guidelines Appendix G. For the purposes of this proposed Master Plan, a potentially significant GHG impact would occur if the proposed Master Plan would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. There are currently no established thresholds for assessing whether the GHG emissions of a project, such as the proposed Master Plan, would be considered a cumulatively considerable contribution to global climate change; however, all reasonable efforts should be made to minimize a project's contribution to global climate change. In addition, while GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008), GHG emissions impacts must also be evaluated on a project-level under CEQA.

With respect to GHG emissions, CEQA Guidelines Section 15064.4(a) states that lead agencies "shall make a good -faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions resulting from a project. The CEQA Guidelines note that an agency has the discretion to either quantify a project's GHG emissions or rely on a "qualitative analysis or performance-based standards" (14 CCR 15064.4[a]). A lead agency may use a "model or methodology" to estimate GHG emissions and has the discretion to select the model or methodology it considers "most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change" (14 CCR 15064.4[c]). The CEQA Guidelines provide that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment (14 CCR 15064.4[b]):

1. The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

In addition, the CEQA Guidelines specify that "when adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence" (14 CCR 15064.7[c]).

The extent to which a project increases or decreases GHG emissions in the existing environmental setting should be estimated in accordance with CEQA Guidelines Section 15064.4, Determining the Significance of Impacts from Greenhouse Gas Emissions. The CEQA Guidelines indicate that when calculating GHG emissions resulting from a project, lead agencies shall make a good-faith effort based on scientific and factual data (Section 15064.4[a]), and lead agencies have discretion to select the model or methodology deemed most appropriate for enabling decision makers to intelligently assess the project's incremental contribution to climate change (Section 15064.4[c]).

The CEQA Guidelines do not indicate an amount of GHG emissions that constitutes a significant impact on the environment. Instead, they authorize the lead agency to consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence (14 CCR 15064.4[a] and 15064.7[c]).

Governor's Office of Planning and Research Guidance

The Governor's Office of Planning and Research technical advisory titled "CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review," states that "public agencies are encouraged but not required to adopt thresholds of significance for environmental impacts. Even in the absence of clearly defined thresholds for GHG emissions, the law requires that such emissions from CEQA projects must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact" (OPR 2008). Furthermore, the advisory document indicates that "in the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a 'significant impact,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice" (OPR 2008).

Campus-Specific Mass Emissions Threshold

A campus-specific mass emissions threshold was derived based on the state's and Cal Poly Pomona's most recent GHG inventories. This approach is appropriate for the proposed Master Plan because it compares the Master Plan's GHG emissions to statewide GHG reduction goals established for 2030 in SB 32 (i.e., 40% below 1990 levels), and for 2045 in AB 1279 (i.e., 85% below 1990 levels). The campus-specific mass emission threshold is discussed below.

The first step in the derivation of the campus-specific mass emissions threshold was to identify the percentage reduction that must be achieved statewide for attainment of the 2030 and 2045 GHG reduction goals. The state's 2024 inventory (371 MMT CO_2e) was used to derive a percent reduction that would be in line with the state's 2045 target (0 MMT CO_2e) from the 2024 GHG emission levels, applying a straight-line regression between the 2030 and 2045 emissions reduction targets. In 2040, the state's estimated emission target would be approximately 62 MMT CO_2e. When calculating the state's estimated emissions target, sources applicable to Cal Poly Pomona were used including transportation, electricity, residential, commercial and recycling and waste); therefore, sources such as industrial and high GWP sources were not included. Based on that calculation, the state needs to achieve a percent reduction of approximately 78% from the 2024 inventory to be in line with the 2045 reduction target.

The second step was to apply the statewide percent reduction of 78% to Cal Poly's 2022 GHG emissions inventory (22,122 MT CO_2e, as reported in the Sustainability Tracking, Assessment & Rating System [STARS] used by Cal Poly Pomona) to determine the mass emissions level for 2040, the buildout horizon for the proposed Master Plan, that would be in line with the state's goals (Cal Poly Pomona 2023). This calculation identified a mass emissions level of 4,867 MT CO_2e. (This is a conservative approach because, in lieu of using an interpolated percent reduction specific to the proposed Master Plan's buildout year, the threshold derivation methodology utilizes the full 78% reduction necessary statewide for 2050 in the Master Plan's interim buildout year of 2040.)

The third step involved dividing the campus-specific mass emissions level (4,867 MT CO_2e) by Cal Poly Pomona's total anticipated campus population, including all full-time equivalent staff and faculty (FTE) and full-time equivalent students (FTES) (i.e., 32,941 campus population). This calculation resulted in a per capita emissions level of 0.147 MT CO_2e per year.

The fourth and final step involved multiplying the per capita emissions rate by Cal Poly Pomona's net increase in campus population (i.e., 7,863 campus population) to obtain the campus-specific mass emission threshold of 1,164 MT CO_2e per year. Therefore, the net operational emissions associated with Cal Poly Pomona's operations that would be less than this mass emissions threshold would be consistent with state targets and would have a less than cumulatively considerable contribution to climate change. The equation and calculations for the campus-specific mass emission threshold are provided in Table 4.9-3; detailed campus-specific mass emissions threshold calculations also are provided in Appendix B.

Table 4.9-3. Campus-Specific Mass Emissions Threshold

Equation	Calculation
Cal Poly Pomona's 2022 GHG emissions inventory – [Cal Poly Pomona's 2022 GHG emissions inventory × % reduction to be in line with the 2045 reduction target] = mass emissions level	22,122 MT CO_2e X 78% = 17,255 MT CO_2e 22,122 MT CO_2e - 17,255 MT CO_2e = 4,867 MT CO_2e
Mass emissions level ÷ by the total anticipated Cal Poly's campus population, including all faculty/staff and students in 2040 = per capita emissions level per year	4,867 MT CO_2e ÷ 32,941 total campus population = 0.148 MT CO_2e per year
Per capital emissions level per year × net increase in Cal Poly Pomona's campus population by 2040 attributable to the Master Plan = campus-specific mass emission threshold per year	0.148 MT CO_2e per year × 7,863 net campus population = 1,164 MT CO_2e per year
Campus-Specific Mass Emissions Threshold	**1,164 MT CO_2e per year**

Source: Appendix B, Cal Poly Pomona 2023.
Notes: MT CO_2e = metric tons of carbon dioxide equivalent.

Note that, because the GHG per capita emissions rate is based on Cal Poly Pomona's GHG emissions inventory and anticipated campus population (i.e., FTES and faculty/staff FTE), the threshold is geographically and jurisdictionally specific to Cal Poly Pomona. Furthermore, the per capita emissions limit is based on the state's established emissions reductions needed to achieve both the 2030 and 2050 GHG reduction targets.

4.9.3.2 Methodology

Construction Emissions

Emissions from the construction phase of the proposed Master Plan were estimated using California Emissions Estimator Model (CalEEMod) Version 2022.1. Construction of the proposed Master Plan would result in GHG emissions primarily associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. The analysis of GHG emissions used the same methodology and modeling inputs as the analysis of air quality impacts in Section 4.3, Air Quality, of this EIR. All details for construction criteria air pollutants discussed in Section 4.3.3.2, Methodology (Construction Emissions) are also applicable for the estimation of construction GHG emissions. As such, see Section 4.3.3.2 for a discussion of construction emissions calculation methodology and modeling inputs used in the GHG emissions analysis.

Operational Emissions

Emissions from the operational phase of the proposed Master Plan were estimated using CalEEMod Version 2022.1 based on an operational year 2040, the estimated planning horizon for the Master Plan. Emissions from the existing land uses on the campus were also estimated using CalEEMod to present the net change in GHG emissions. Operational year 2024 was used to represent the existing conditions.

Of note, CalEEMod provides conservative and representative default values (e.g., emission factors) for each emissions source type, so that the model may be used to estimate emissions once all project-specific and existing land use characteristics and information have been input into the model. Default values in CalEEMod can be replaced with project-specific/campus-specific information, where such information is readily available. In this instance, the GHG emissions inventories for the proposed Master Plan and existing campus conditions reflect the use of Master Plan-specific/campus-specific and default inputs, as described further below. In this respect, the methodologies used in the emission calculations presented in this analysis differ from the campus reported inventory, which utilizes the Sustainability Tracking, Assessment & Rating System (STARS), a self-reporting framework for colleges and universities to gauge relative progress toward sustainability.

Existing and potential operational GHG emissions were estimated for area sources (landscape maintenance), energy sources (natural gas and electricity), mobile sources, solid waste, and water and wastewater treatment. Emissions from each category are discussed in the following text with respect to the proposed Master Plan. For a discussion of operational emission calculation methodology and modeling inputs, specifically for area, energy (natural gas), and mobile sources, see Section 4.3.3.2, Methodology (Operational Emissions).

Area Sources

CalEEMod was used to estimate GHG emissions from the proposed Master Plan's area sources that would include operation of gasoline-powered landscape maintenance equipment, which produce minimal GHG emissions. Notably, emissions associated with landscape maintenance equipment are likely overestimated as such emissions are expected to be reduced over time with CARB's approval of amendments to the small off-road engine regulations, which would require that new landscaping equipment be zero emission starting in 2024. See Section 4.3.3.2 for a discussion of landscaping equipment emissions calculations. Consumer product use and architectural coatings result in VOC emissions, which are analyzed in the air quality analysis only (see Section 4.3) and would generate little to no GHG emissions.

Energy Sources

The estimation of operational energy emissions was based on CalEEMod land use defaults and units or total area (i.e., square footage) of the proposed Master Plan's land uses. The energy use (electricity or natural gas usage per square foot per year) from residential land uses is calculated in CalEEMod based on the Residential Appliance Saturation Study. Emissions are calculated by multiplying the energy use by the utility carbon intensity (pounds of GHGs per kilowatt-hour for electricity or 1,000 British thermal units for natural gas) for CO_2 and other GHGs. Annual natural gas and electricity emissions were estimated in CalEEMod using the emissions factors for Southern California Edison (SCE), which would be the energy provider for the proposed Master Plan.

CalEEMod default energy intensity factors (CO_2, CH_4, and N_2O mass emissions per kilowatt-hour) for SCE were utilized for the proposed Master Plan analysis. As explained in Section 4.9.2, Regulatory Setting, state SB X1 2 established a target of 33% from renewable energy sources for all electricity providers in California by 2020 and Senate Bill 100 calls for further development of renewable energy, with a target of 60% by 2030. As such, GHG emissions associated with proposed Master Plan electricity demand would continue to decrease over time.

Mobile Sources

All details for criteria air pollutants discussed in Section 4.3.3.2 are also applicable for the estimation of operational mobile source GHG emissions. The effectiveness of fuel economy improvements was evaluated by using the CalEEMod emission factors for motor vehicles in 2040 for the proposed Master Plan buildout and 2024 for existing conditions to the extent it was captured in EMFAC 2021, which is the CARB model incorporated into CalEEMod for purposes of estimating vehicle tailpipe emissions.

Solid Waste

Solid waste generation during existing conditions and as a result of the proposed Master Plan would generate solid waste and, therefore, result in CO_2e emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste for existing conditions and for the proposed Master Plan. Default solid waste generation rates from CalEEMod were assumed for the existing land uses.

Water and Wastewater Treatment

Supply, conveyance, treatment, and distribution of water require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the proposed Master Plan requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment. Water consumption estimates for both indoor and outdoor water use, associated electricity consumption from water use and wastewater generation were estimated using default values in CalEEMod.

Stationary Sources

The proposed Master Plan will install an emergency diesel generator (500 horsepower) for emergency safety systems during a power outage for the proposed Student Housing Replacement Project (Phase III). CalEEMod was used to estimate criteria air pollutant emissions of the generator assuming 1 hour per week and 52 hours per year for maintenance and testing.

4.9.4 Impact Analysis

4.9.4.1 Project Impacts

Impact 4.9-1 **The project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. (Less than Significant)**

Program-Level Analysis for the Master Plan

Construction Emissions

Construction of the proposed Master Plan would result in GHG emissions, which are primarily associated with use of off-road construction equipment and on-road vehicles (haul trucks, vendor trucks, and worker vehicles). Construction GHG emissions were calculated, amortized over 30 years, and added to the total operational emissions for comparison with the campus-specific mass emissions threshold of 1,164 MT CO_2e per year. Therefore, the determination of significance is addressed in the operational emissions discussion below.

As discussed above, CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 4.3.3.2, Methodology (Construction Emissions). Table 4.9-4 presents construction emissions for the proposed Master Plan from on-site and off-site emission sources. Construction of the proposed Master Plan was estimated to last a total of approximately 15 years (through 2040). Construction emissions for the proposed Master Plan were determined based on the conservative estimate that up to approximately 1.1 million GSF of buildings could be constructed and/or renovated concurrently over a five-year duration (2026 to 2030). The annual average construction emissions were then multiplied over the proposed Master Plan's 15-year buildout in order to estimate the total GHG emissions due to the proposed Master Plan's construction.

Table 4.9-4. Estimated Annual Construction GHG Emissions

Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
2026	1,330.79	0.06	0.08	1,358.26
2027	2,142.31	0.07	0.13	2,183.28
2028	2,352.47	0.07	0.13	2,394.97
2029	2,441.31	0.07	0.13	2,484.46
2030	2,082.39	0.06	0.12	2,120.69
Construction Emissions Total for Maximum short-term Construction Scenario				10,541.67
Annual Average				2,108.33
Total Construction Emissions Over 15-Year Buildout (= Annual Average X 15)				31,625.02
Amortized Construction Emissions (= Total Construction Emissions ÷ 30)				1,054.17

Source: Appendix B.
Notes: GHG = greenhouse gas; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent; <0.01 = reported value less than 0.01.

As shown in Table 4.9-4, the estimated proposed Master Plan construction emissions amortized over 30 years would be approximately 1,054 MT CO_2e per year. Because there is no separate GHG threshold for construction, the evaluation of significance is discussed in the operational emissions analysis in the following text.

Operational Emissions

Operations attributable to proposed Master Plan development (both new development and redevelopment) and existing campus development that would remain with Master Plan implementation, and operation under existing conditions would generate GHG emissions through motor vehicle trips; landscape maintenance equipment operation (area source); energy use (natural gas and electricity); solid waste disposal; water supply, treatment, and distribution; and wastewater treatment. CalEEMod was used to calculate the annual GHG emissions based on the operational parameters described in Section 4.9.3.2, Methodology (Operational Emissions).

Likewise, comprehensive implementation of the CSU Sustainability Policy and Cal Poly Pomona's Climate Action Plan and associated Carbon Neutrality Roadmap are also not quantitatively factored into the annual GHG emissions associated with proposed Master Plan operations. While not factored into the quantitative analysis, these sustainability plans and policies would serve to reduce Cal Poly Pomona's GHG emissions over the planning horizon for the proposed Master Plan (2040).

The estimated operational Master Plan and existing GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, and water usage and wastewater generation, and the net change in emissions (Master Plan minus existing emissions) are shown in Table 4.9-5.

Table 4.9-5 Estimated Annual Operational GHG Emissions

Emission Source	MT CO_2e per Year
Master Plan Buildout	
Mobile	45,889.35
Area	191.72
Energy	25,525.00
Water	822.67
Waste	3,413.42
Stationary	9.93
Total Master Plan Annual Emissions	**75,852.09**
Amortized Construction Emissions	*1,054.17*
Total Annual Emissions	**76,906.26**
Existing Conditions	
Mobile	48,779.40
Area	166.23
Energy	31,743.60
Water	628.58
Waste	2,579.19
Total Existing Annual Emissions	**83,897.00**
Net Operational Emissions (Master Plan Minus Existing Conditions)	**-6,990.74**
Mass Emissions Threshold	**1,164**
Threshold Exceeded?	**No**

Source: Appendix B.
Notes: GHG = greenhouse gas; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent; Totals may not sum due to rounding.
The Master Plan emissions reflect operational year 2040.
The existing conditions emissions reflect operational year 2024.

As shown in Table 4.9-5, approximately 83,897 MT CO_2e per year are estimated to be generated under existing conditions. Comparatively, estimated annual Master Plan GHG emissions would be approximately 75,852 MT CO_2e per year as a result of Master Plan operations only. With amortized construction emissions, the proposed Master Plan would result in GHG emissions of approximately 76,906 MT CO_2e per year. Overall, the proposed Master Plan would result in a net decrease of approximately 6,991 MT CO_2e per year relative to existing conditions. The net decrease in emissions can be primarily attributed to significant anticipated reductions in use of petroleum fuel in vehicles through compliance with state's Advanced Clean Car's regulation and Southern California Edison compliance with the state's Renewable Portfolio Standard Goals to reduce GHG emissions related to electricity generation by the year 2040.

As previously discussed, the campus-specific mass emissions threshold of 1,164 MT CO_2e per year was developed to assess if the proposed Master Plan's GHG emissions would result in a significant, cumulatively considerable contribution to climate change. Based on the estimated emissions presented in Table 4.9-5, the proposed Master Plan would not result in the exceedance of the campus-specific mass emission threshold. Thus, the proposed Master Plan's GHG emissions would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Construction activities associated with the proposed individual near-term projects are captured above at the program-level for implementation of the proposed Master Plan. This is because the program-level analysis considers buildout of all individual projects considered in the Master Plan.

Similarly, operation of the near-term projects are captured in the program-level analysis above, which considers operation of all proposed Master Plan projects and student and employee growth. As shown in Table 4.9-5 above for the program-level analysis, the estimated net annual operational Master Plan GHG emissions combined with the amortized construction emissions would not exceed the mass emissions threshold. Given that each near-term project is captured within the program-level analysis presented in Table 4.9-5, construction and operational GHG emissions for each near-term project would be **less than significant**.

Impact 4.9-2 The project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. (Less than Significant)

Program-Level Analysis for the Master Plan

Consistency with the CSU Sustainability Policy

The CSU Sustainability Policy was originally adopted in 2014 and was most recently updated in 2024. The policy focuses mainly on energy and GHG emissions, and largely aligns with the State of California energy and GHG emissions reduction goals. The policy aims to reduce the environmental impact of construction and operation of buildings and to integrate sustainability across the curriculum. As discussed in Chapter 3, Project Description (Section 3.6.6, Sustainability and Resiliency), the proposed Master Plan would comply with the CSU Sustainability Policy through meeting or exceeding the minimum requirements equivalent to LEED Silver, striving for LEED Gold or Platinum. Additionally, new construction and renovation projects, shall exceed all applicable energy codes and regulations (Building Energy Efficiency Standards, Tit. 24 CCR Section 6) by 10%. Other relevant elements of the 2024 CSU Sustainability Policy also apply to proposed Master Plan development and will be implemented as described in the policy.

Consistency with the Cal Poly Pomona Climate Action Plan

As previously discussed, the Cal Poly Campus Climate Action Plan (Cal Poly Pomona 2009) includes a Carbon Neutrality Roadmap as a technical appendix in support of achieving carbon neutrality by 2030. The roadmap includes goals in a variety of sectors including: water, energy, food, waste, transportation, education, research and outreach.

As discussed in Chapter 3, Project Description (Section 3.6.6 Sustainably and Resiliency), the proposed Master Plan would support progress toward meeting the carbon neutrality goal by expanding on-campus renewable energy production with the installation of solar photovoltaic (PV) shades on building roofs and solar shades between buildings. Furthermore, all new buildings and major building renovations will be designed and built to meet or exceed the minimum requirements equivalent to LEED Silver, striving for LEED Gold or Platinum. Additionally, new construction and renovation projects, would exceed all applicable energy codes and regulations (Building Energy Efficiency Standards, Tit. 24 CCR Section 6) by 10%. Overall, the proposed Master Plan would support progress toward meeting carbon neutrality, per the Cal Poly Campus Climate Action Plan (Cal Poly Pomona 2020) and the Carbon Neutrality Roadmap.

Potential to Conflict with the Connect SoCal (2024–2050 RTP/SCS)

SCAG's Connect SoCal is a regional growth management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The Connect SoCal incorporates local land use projections and circulation networks in city and county general plans. Typically, a project would not conflict with the RTP/SCS if the project does not exceed the underlying growth assumptions within the RTP/SCS.

As stated in the Connect SoCal 2024–2050 RTP/SCS, there is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be consistent with the RTP/SCS, and lead agencies have the sole discretion in determining a local project's potential to conflict with the RTP/SCS (SCAG 2024). Connect SoCal 2024 underlines four core categories—mobility, communities, environment, economy—each with its own set of goals. The major goals under the environment category of the Connect SoCal are outlined in Table 4.9-6, along with an overview of the proposed Master Plan's consistency with the RTP/SCS goals.

Table 4.9-6. Master Plan Potential to Conflict with the Connect SoCal (SCAG 2024–2050 RTP/SCS)

RTP/SCS Goal	Potential to Conflict
Environmental Goal 1: Sustainable Development	**No Conflict.** The 2024–2050 RTP/SCS identifies sustainable development, including water and energy-efficient building practices and green infrastructure, as a strategy to reduce GHG emissions. The Master Plan would not result in an inefficient or wasteful use of natural resources and promotes sustainability on site through its compliance with CALGreen requirements for electric vehicle infrastructure and incorporation of water-efficient landscaping.
Environmental Goal 2: Air Quality	**No Conflict.** The 2024–2050 RTP/SCS identifies air quality and meeting federal and state ambient air quality standards as a co-benefit of reducing GHG emissions. The Master Plan would support the use of the existing and proposed pedestrian, bicycle, and mass transit infrastructure and connectivity. The Master Plan includes projects that would support the use of multimodal transportation including the New Campus Transit Center and the Campus Loop Improvements. Furthermore, the Master Plan would not

Table 4.9-6. Master Plan Potential to Conflict with the Connect SoCal (SCAG 2024–2050 RTP/SCS)

RTP/SCS Goal	Potential to Conflict
	exceed the SCAQMD's threshold of significance for any criteria air pollutant and would not result in any significant impacts related to air quality.
Environmental Goal 3: Clean Transportation	**No Conflict**. The 2024–2050 RTP/SCS identifies EV charging infrastructure, adoption of zero-emission vehicles, and clean transit as ways to reduce GHG emissions from mobile sources. The Master Plan would comply with CALGreen standards for development projects. Therefore, the Master Plan would not conflict with the goal of providing access to clean transportation.
Environmental Goal 4: Natural and Agricultural Lands Preservation	**No Conflict.** The 2024-2050 RTP/SCS promotes the conservation and restoration of natural and agricultural lands through several policies, such as quantifying the carbon sequestration potential of natural and agricultural lands and prioritization of sensitive habitat and wildlife corridors for permanent protection. The Master Plan is located on a site with natural and agricultural lands. As demonstrated in Section 4.2, Agriculture and Forestry, the Master Plan would not result in the removal of these lands.
Environmental Goal 5: Climate Resilience	**No Conflict.** The 2024-2050 RTP/SCS promotes regional coordination and solutions for effective emergency response for climate-related hazards. Additionally, in the category of climate resilience, SCAG has established the following policies: prioritize the most vulnerable populations and communities subject to climate hazards; support local and regional climate and hazard planning; support nature-based solutions to increase regional resilience; promote sustainable housing needs in a drier environment. While the Master Plan does not directly address these climate resilience efforts, the Master Plan would not interfere with this goal.

Source: SCAG 2024.

As shown in Table 4.9-6, the proposed Master Plan would not conflict with any of the environmental goals within SCAG's Connect SoCal. Therefore, the proposed Master Plan would not conflict with the goal to improve air quality and GHG emissions in the region.

Potential to Conflict with CARB's 2022 Scoping Plan, AB 1279, and EO B-55-18

As discussed in Section 4.9.2.2, The California State Legislature passed the Global Warming Solutions Act of 2006 (AB 32) to provide initial direction to limit California's GHG emissions to 1990 levels by 2020 and initiate the state's long-range climate objectives. Since the passage of AB 32, the state has adopted GHG emissions reduction targets for future years beyond the initial 2020 horizon year. For the proposed Master Plan, the relevant GHG emissions reduction targets include those established by SB 32 and AB 1279, which require GHG emissions be reduced to 40% below 1990 levels by 2030, and 85% below 1990 levels by 2045, respectively. In addition, AB 1279 requires the state to achieve net zero GHG emissions by no later than 2045 and achieve and maintain net negative GHG emissions thereafter.

> As defined in AB 32, CARB is required to develop the Scoping Plan, which provides the framework for actions to achieve the state's GHG emission targets. The Scoping Plan is required to be updated every 5 years and requires CARB and other state agencies to adopt regulations and initiatives that will reduce GHG emissions statewide. The first Scoping Plan was adopted in 2008, and was updated in 2014, 2017, and most recently in 2022. While the Scoping Plan is not directly

applicable to specific projects, nor is it intended to be used as the sole basis for project-level evaluations,[4] it is the official framework for the measures and regulations that will be implemented to reduce California's GHG emissions in alignment with the adopted targets. Therefore, a project would be found to not conflict with the statutes if it would meet the Scoping Plan policies and would not impede attainment of the goals therein.

CARB's 2017 Climate Change Scoping Plan update was the first to address the state's strategy for achieving the 2030 GHG reduction target set forth in SB 32 (CARB 2017a), and the most recent CARB 2022 Scoping Plan for Achieving Carbon Neutrality update outlines the state's plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279 and assesses progress toward the 2030 SB 32 target (CARB 2022b). As such, given that SB 32 and AB 1279 are the relevant GHG emission targets, the 2022 Scoping Plan updates the strategy to achieve those targets that are the most applicable to the proposed Master Plan. Table 4.9-7 analyzes the proposed Master Plan's potential to conflict with the most applicable actions in the 2022 Scoping Plan, specifically those aimed at achieving the GHG emissions targets set forth by SB 32 and AB 1279.[5]

Table 4.9-7. Master Plan Potential to Conflict with 2022 Scoping Plan

Sector	Action	Potential to Conflict
GHG Emissions Reductions Relative to the SB 32 Target	40% below 1990 levels by 2030	**No conflict.** While the SB 32 GHG emissions reduction target is not an action that is analyzed independently, it is provided in Table 2-1 of the 2022 Scoping Plan for reference. The Master Plan would not obstruct or interfere with agency efforts to meet the SB 32 reduction goal.
Smart Growth/VMT	VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	**No conflict.** The Master Plan would not obstruct or interfere with agency efforts to meet this regional VMT reduction goal, including through implementation of SB 375. Furthermore, as shown in Section 4.17, Transportation, the Master Plan would result in a less than significant VMT impact.
Light-duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)	100% of LDV sales are ZEV by 2035	**No conflict.** As this action pertains to LDV sales within California, the Master Plan would not obstruct or interfere with its implementation.
Truck ZEVs	100% of medium-duty vehicle (MDV)/ heavy-duty vehicle (HDV) sales are ZEV by 2040	**No conflict.** As this action pertains to MDV and HDV sales within California, the Master Plan would not obstruct or interfere with its implementation.

[4] The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

[5] Table 4.9-7 is not intended to provide exhaustive list of the 2022 Scoping Plan actions set forth to help the state reach its long-range climate objectives. Only the most relevant actions to the Master Plan pertaining to SB 32 and AB 1279 are analyzed in Table 4.9-7. The 2022 Scoping Plan, inclusive of all actions, is available for review on CARB's website (CARB 2022a).

Table 4.9-7. Master Plan Potential to Conflict with 2022 Scoping Plan

Sector	Action	Potential to Conflict
Electricity Generation	Sector GHG target of 38 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) in 2030 and 30 $MMTCO_2e$ in 2035 Retail sales load coverage[1] 20 gigawatts (GW) of offshore wind by 2045 Meet increased demand for electrification without new fossil gas-fired resources	**No conflict**. As this Action pertains to the statewide procurement of renewably generated electricity, the Master Plan would not obstruct or interfere with its implementation.
New Residential and Commercial Buildings	All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030	**No conflict.** The Master Plan would not obstruct or interfere with CARB's efforts to meet the targets of all electric appliances for new residential and commercial buildings. The Master Plan would incorporate the use of electric appliances within the residential buildings, in compliance with the Building Code requirements.
Construction Equipment	25% of energy demand electrified by 2030 and 75% electrified by 2045	**No conflict.** As this Action pertains to the electrification of off-road equipment across California, the Master Plan would not obstruct or interfere with its implementation.
Chemicals and Allied Products; Pulp and Paper	Electrify 0% of boilers by 2030 and 100% of boilers by 2045. Hydrogen for 25% of process heat by 2035 and 100% by 2045 Electrify 100% of other energy demand by 2045.	**No conflict.** As this Action pertains to the electrification of industrial processes, the Master Plan would not obstruct or interfere with its implementation.
Other Industrial Manufacturing	0% energy demand electrified by 2030 and 50% by 2045	**No conflict.** As this Action pertains to the electrification of industrial processes, the Master Plan would not obstruct or interfere with its implementation.
Low Carbon Fuels for Transportation	Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen	**No conflict**. The Master Plan would not obstruct or interfere with CARB's efforts to increase the provision of low carbon fuels for transportation.

Table 4.9-7. Master Plan Potential to Conflict with 2022 Scoping Plan

Sector	Action	Potential to Conflict
Low Carbon Fuels for Buildings and Industry	In 2030s biomethane blended in pipeline Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040 In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters	**No conflict.** The Master Plan would not obstruct or interfere with CARB's efforts to increase the provision of low carbon fuels for use in buildings and industry.
High GWP Potential Emissions	Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions	**No conflict.** The Master Plan would not obstruct or interfere with agency efforts to introduce low GWP refrigerants.

Source: CARB 2022

As demonstrated above, the proposed Master Plan would not conflict with SCAG's 2024-2050, RTP/SCS, the CSU's Sustainability Policy, and the CARB's 2022 Scoping Plan updates and with the state's ability to achieve the GHG reduction and carbon neutrality goals. Further, the proposed Master Plan's consistency with most applicable measures and programs would assist in meeting Cal Poly Pomona's contribution to GHG emission-reduction targets in California. Based on the considerations previously outlined, the proposed Master Plan would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and the impact would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Near-term projects would comply with the CSU Sustainability Policy through meeting or exceeding the minimum requirements equivalent to LEED Silver, striving for LEED Gold or Platinum. Additionally, new construction and renovation projects shall exceed all applicable energy codes and regulations (Building Energy Efficiency Standards, Tit. 24 CCR Section 6) by 10%. Other relevant elements of the 2024 CSU Sustainability Policy also apply to proposed near-term projects and will be implemented as described in the policy.

Similar to the proposed Master Plan, near-term projects would support progress toward meeting the carbon neutrality goal by expanding on-campus renewable energy production with the installation of solar photovoltaic (PV) shades on building roofs and solar shades between buildings. Furthermore, all new buildings and major building renovations will be designed and built to meet or exceed the minimum requirements equivalent to LEED Silver, striving for LEED Gold or Platinum. Additionally, new construction and renovation projects, would exceed all applicable energy codes and regulations (Building Energy Efficiency Standards, Tit. 24 CCR Section 6) by 10%. Overall, the near-term projects would support progress toward meeting carbon neutrality, per the Cal Poly Campus Climate Action Plan (Cal Poly Pomona 2020) and the Carbon Neutrality Roadmap.

Connect SoCal 2024 underlines four core categories—mobility, communities, environment, economy—each with its own set of goals. The major goals under the environmental category of Connect SoCal are outlined in Table 4.9-6,

along with an overview of the proposed Master Plan's consistency with the RTP/SCS goals. Similar to the proposed Master Plan, near-term projects would promote sustainability on site through its compliance with CALGreen requirements for electric vehicle infrastructure, incorporation of water-efficient landscaping, and projects that would support the use of multimodal transportation. Additionally, as demonstrated in Section 4.2, Agriculture and Forestry, the proposed Master Plan would not result in the removal of agricultural or natural lands. Near-term projects would not otherwise obstruct implementation of the Connect SoCal goals.

As demonstrated above, the proposed Master Plan would not conflict with CARB's 2022 Scoping Plan updates and with the state's ability to achieve the GHG reduction and carbon neutrality goals. Near-term projects would follow similar design requirements and thus would also not conflict with the CARB's 2022 Scoping Plan updates. Near-term projects would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and the impact would be **less than significant**.

4.9.4.2 Cumulative Impacts

Impact 4.9-3 The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to greenhouse gas emissions. (Less than Significant)

The geographic area for the analysis of cumulative impacts resulting from GHG emissions is global. Cumulative development throughout the SCAB would generate GHG emissions that could have a significant impact on the environment. Global climate change is an inherently cumulative impact issue, and there are currently no established thresholds for assessing whether the GHG emissions of a project would be considered a cumulatively considerable contribution to global climate change. However, statewide and regional GHG reduction regulations or strategies would continue to improve and reduce cumulative GHG emissions.

As shown in Table 4.9-5 and Impact 4.9-1, the proposed Master Plan would result in GHG emissions that would not exceed the campus-specific mass emissions threshold of 1,164 MT CO_2e per year, resulting in a less than significant contribution to a cumulatively significant GHG emissions impacts. In addition, as described in Impact 4.9-2 above, the proposed Master Plan would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, resulting in a less than significant impact related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Therefore, based on the assessment provided herein, the proposed Master Plan would not result in a considerable contribution to a significant cumulative GHG impact and cumulative impacts would be **less than significant**.

4.9.5 Mitigation Measures

Mitigation measures are not required because a significant impact has not been identified.

4.9.6 Level of Significance After Mitigation

All impacts would be less than significant without mitigation.

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4.10 Hazards and Hazardous Materials

The following analysis identifies potential impacts to hazards and hazardous materials resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing hazards and hazardous materials conditions of the proposed Master Plan area, discusses the regulatory setting, evaluates potential impacts associated with hazards and hazardous materials, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts.

No comments related to hazards and hazardous materials were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are provided in Appendix A.

4.10.1 Environmental Setting

4.10.1.1 Historical Site Uses

As discussed in Chapter 3, Project Description, the initial 813 acres of the main campus was originally a horse ranch, which was deeded to the State of California in 1949 by W.K. Kellogg for use as a public university. Most of the main campus buildings were constructed between the late 1950s, when the main campus was first occupied, through the 2000s. Prior to construction of the various main campus buildings, most of the land was a former horse ranch and open fields related to the W.K. Kellogg Arabian Horse Ranch (see Section 4.6, Historical Resources, and Appendix D-2 for additional details about the former horse ranch).

The U.S. Environmental Protection Agency (EPA) released a partial ban on asbestos-containing materials (ACMs) in 1989, but a full ban on the use and marketing of ACMs did not occur until April 2019. The United States also banned lead-based paint for use in housing in 1978; however, lead-based paint use in commercial structures was not included in this ban. Many of the structures proposed for renovation or demolition were built before these bans took effect. Therefore, there is a potential for ACMs and lead-based paint to be present in the building materials. In addition, universal waste items containing hazardous materials (e.g., polychlorinated biphenyls, metals) may be present.

As discussed briefly in Chapter 3, the main campus is partially located on the closed Spadra Landfill, which is not included in the proposed Master Plan area. The Spadra Landfill operated from 1957 through 2000 as a permitted municipal solid waste landfill; operations also included various materials recovery programs, and LandLab, a 320-acre center for education and research in sustainability, recycling, waste diversion, and refuse capacity efficiency (LACSD 2024a). The portion of the main campus that overlaps the Spadra Landfill property was not used for landfilling (LACSD 2019).

4.10.1.2 Hazardous Materials

Cortese List Sites

Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to compile a list of hazardous waste and substances sites (Cortese List). While the Cortese List is no longer maintained as a single list, the following databases provide information that meet Cortese List requirements:

1. List of Hazardous Waste and Substances sites from Department of Toxic Substances Control Envirostor database (Health and Safety Codes 25220, 25242, 25356, and 116395)
2. List of leaking underground storage tanks (LUST) Sites by County and Fiscal Year from the State Water Resources Control Board GeoTracker database (Health and Safety Code 25295)
3. List of solid waste disposal sites identified by the State Water Resources Control Board with waste constituents above hazardous waste levels outside the waste management unit (Water Code Section 13273[e] and 14 CCR Section 18051)
4. List of "active" Cease and Desist Orders and Cleanup and Abatement Orders from the State Water Resources Control Board (Water Code Sections 13301 and 13304)
5. List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by the Department of Toxic Substances Control

A search of the above-mentioned online databases that provide information on Cortese List sites was conducted for this EIR. One LUST site was identified on the main campus and identified at the address 3801 West Temple Avenue, which is the general address for the main campus. The online LUST case file includes a closure letter from Los Angeles Regional Water Quality Control Board (LARWQCB), confirming "completion of the site investigation and remedial action for the underground storage tanks formerly located at [the main campus]" (LARWQCB 1996a). The case file also includes a list of all reported underground storage tanks (USTs) throughout the main campus. The UST list includes 23 tanks that contain gasoline, diesel, or waste oil, and all but two are operational (two were removed in 1990) (LARWQCB 1996b). The closure letter also includes maximum documented contaminant concentrations, which indicate diesel-range hydrocarbons and gasoline-range hydrocarbons were detected in soil and groundwater, respectively, in 1994. Concentrations were 1,410 milligrams per kilogram (mg/kg) diesel in soil, and 12 micrograms per liter (µg/L) gas in water (LARWQCB 1996b); both concentrations are below present-day Environmental Screening Levels for unrestricted land use (SFBRWQCB 2019). The main campus was not identified on any other Cortese List databases.

Other Hazardous Material Sites

Other online databases that provide environmental information on facilities and sites in the State of California were also reviewed. While these databases are not included in the Cortese List, they may provide additional information regarding potential environmental contamination on the main campus and in the vicinity. Table 4.10-1 provides a summary of the databases searched.

Table 4.10-1. Online Database Listings

Database	Details
California Environmental Protection Agency (CalEPA) https://siteportal.calepa.ca.gov/nsite/	The CalEPA Regulated Site Portal is a website that combines data about environmentally regulated sites and facilities in California into a single, searchable database and interactive map. Data sources include California Environmental Reporting System, EnviroStor, GeoTracker, California Integrated Water Quality System, and Toxics Release Inventory.
Department of Toxic Substance Control (DTSC) EnviroStor https://www.envirostor.dtsc.ca.gov/	DTSC's data management system for tracking cleanup, permitting, enforcement, and investigation efforts at hazardous waste facilities and sites with known contamination or sites where there may be reasons for further investigation.
Regional Water Quality Control Board (RWQCB) GeoTracker http://geotracker.waterboards.ca.gov/	The California RWQCB's data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater. GeoTracker contains records for sites that require cleanup, various unregulated projects, and permitted facilities. Sites include LUSTs, Department of Defense, Cleanup Program, Irrigated Lands, Oil and Gas Production, Permitted USTs, and Land Disposal Sites.
CalRecycle Solid Waste Information System (SWIS) https://www2.calrecycle.ca.gov/SolidWaste/Site/Search	The SWIS database contains information on solid waste facilities, operations, and disposal sites throughout California. Types of facilities include landfills, transfer stations, composting sites, in-vessel digestion sites, engineered solid waste conversion facilities, transformation facilities, and closed disposal sites.
California Geologic Energy Management Division (CalGEM) Well Finder database https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx	CalGEMs online mapping application, Well Finder, presents California's oil and gas industry information on a geographic database. Information includes oil, gas, and geothermal well locations, types, owners, and operational status.
National Pipeline Mapping System https://www.npms.phmsa.dot.gov/	The National Pipeline Mapping System Public Map Viewer is a web-based application designed to assist the general public with displaying and querying data related to gas transmission and hazardous liquid pipelines, liquefied natural gas plants, and breakout tanks under Department of Transportation Pipeline and Hazardous Material Safety Administration jurisdiction.

The main campus was identified in the CalEPA Regulated Site Portal for the following items:

- A LUST case. The details of this case are discussed in the Cortese List Sites discussion above.
- Two construction stormwater permits, one for an electrical infrastructure project and one for a building demolition. These permits are issued for construction projects that disturb 1 or more acres of land. They

do not indicate a release of hazardous materials or wastes to the environment, nor do they indicate the presence of hazardous materials.

- A "sewerage spill" listing, which indicates the adoption of a general waste discharge requirement (WDR). In this case, the campus is enrolled under a general WDR (2022-0103-DWQ) that outlines requirements for discharge to the municipal sanitary sewer. The Site ID under this WDR is 631750, as identified in the California Integrated Water Quality System. This listing does not indicate a release of hazardous materials or wastes to the environment, nor does it indicate the presence of hazardous materials.
- An air emissions report under EPA Air Emissions Inventory System. This listing indicates there is a stationary source on campus that has permitted air emissions, such as an exhaust, diesel tank vent, or similar emissions. This listing does not indicate an unauthorized release of hazardous materials or wastes to the environment, although it may indicate permitted storage of hazardous materials.

As discussed in Section 4.10.1.1, Historical Site Uses, and in Chapter 3, Project Description, the main campus partially overlaps the Spadra Landfill. Although no solid waste deposition ever occurred within the main campus, there are groundwater monitoring wells within the main campus boundary along the south side of West Temple Avenue. The monitoring wells were installed as part of the Spadra Landfill post-closure monitoring plan, which was prepared and is implemented under Title 27 of California Code of Regulations and Title 40 of the Code of Federal Regulations. Groundwater is monitored under Order No. R4-2010-0057. The most recent groundwater monitoring data states that the two wells on the main campus, M32B and M50B, are perimeter and background wells, respectively. M32B had concentrations of chloroform (1.4 µg/L) in May 2024 that exceeded the permitted concentrations limit (0.5 µg/L); the report states "past demonstration concluded that the detections were not the result of a release from the landfill" (LACSD 2024b). M50B is measured for groundwater elevation only.

One idle oil and gas well, Well No. 2, owned and operated by Spadra Oil Company, was located within 1 mile of the main campus. Well documentation was reviewed through CalGEM's Well Finder database; based on well permitting documents from 1926, Well No. 2 was completed on the east side of the channel bordering South Campus Drive, beneath what is now the Pomona Islander Mobile Home Park, and is not located within the main campus boundaries. Records indicate the well was abandoned in 1927.

No hazardous material pipelines are located within the boundaries of the main campus.

4.10.1.3 Emergency Response and Wildfire Conditions

Portions of the main campus are located within California Department of Forestry and Fire Protection (CAL FIRE)-designated Fire Hazard Severity Zones, within both local responsibility areas (LRAs) and state responsibility areas (SRAs) (CAL FIRE 2024), a designation that indicates responsibility for responding to fire incidents. CAL FIRE is the primary emergency response agency responsible for fire suppression and prevention in SRAs. The Los Angeles County Fire Department is the primary emergency response agency responsible for fire suppression and prevention in the LRA that covers the campus.

Figure 4.10-1 shows the areas within the main campus with designated Fire Hazard Severity Zones, including very high, high, and moderate. The portion of the campus that is designated as a Very High Fire Hazard Severity Zone (VHFHSZ) includes the Voorhis Ecological Reserve, Parking Lot J, Parking Lot F1, Parking Lot F3, Parking Lot L, Parking Lot M, a portion of the Agriculture Field Laboratory, and portions of the campus core and Kellogg West (specifically existing Buildings 1, 2, 3, 4, 4A, 5, 6, 7, 8, 9, 13, 13A, 14, 17, 23, 24, 25, 32, 46, 71, 76, 76A, 77, 78, 79, 92, 94, 97, 98, 144, 193, as shown in Chapter 3, Project Description, Figure 3-2). While this area is mostly occupied by buildings

and parking lots, the area is also occupied by flammable vegetation and slopes along the northwestern edges of the built portion of the main campus. Such flammable vegetation and slopes are the drivers of such wildfire hazard designations. Additionally, a portion of the Agricultural Field Laboratory and existing campus building are also located within a High Fire Hazard Severity Zone (HFHSZ). The proposed Master Plan area is also partially within a Wildland Urban Interface (WUI) area that borders the western edge and northern edge of the campus and spans from the San Jose Hills ridgeline to theI-10 Freeway (see Figure 4.10-2[1]). However, most of the main campus is either not within a WUI or within the Wildfire Influence Zone located away from susceptible vegetation.

The County of Los Angeles and all cities within the County use the Operational Area Emergency Operation Plan (Operational Area EOP) to respond to major emergencies and disasters. The Operational Area EOP identifies a broad range of potential hazards and a response plan (County of Los Angeles 2023). While evacuation routes are not identified in the Operational Area EOP, typically evacuation routes consist of the major interstates, highways, and prime arterials. Nearby potential evacuation routes nearest to the proposed Master Plan area include the I-10 Freeway (located immediately north of the campus), State Route (SR) 57 (located immediately east of the campus), and SR-60 (located 2 miles south of the campus). However, specific evacuation routes would be determined based on the location and extent of the incident.

Cal Poly Pomona has internal emergency procedures for response to emergencies, disasters, accidents, and injuries that may occur on campus. The Emergency Operations Plan (EOP) (Cal Poly Pomona 2021) prepared by Cal Poly Pomona incorporates and coordinates all university emergency personnel to support emergency operations associated with emergency/disaster planning, training, public awareness, and securing resources. Cal Poly Pomona coordinates with local and state agencies for major disaster response through the Operational Area Response and Recovery System, which activates communication with the County of Los Angeles Office of Emergency Management and California Governor's Office of Emergency Services.

The Cal Poly Pomona EOP indicates evacuation routes are designated throughout the campus to get students and staff to local assembly areas, evacuation coordinators are assigned throughout campus, and evacuation drills are conducted for each building on a regular basis. For campus evacuation, West Temple Avenue, Kellogg Drive, and South Campus Drive provide direct routes off campus to major highways and freeways.

4.10.1.4 Schools

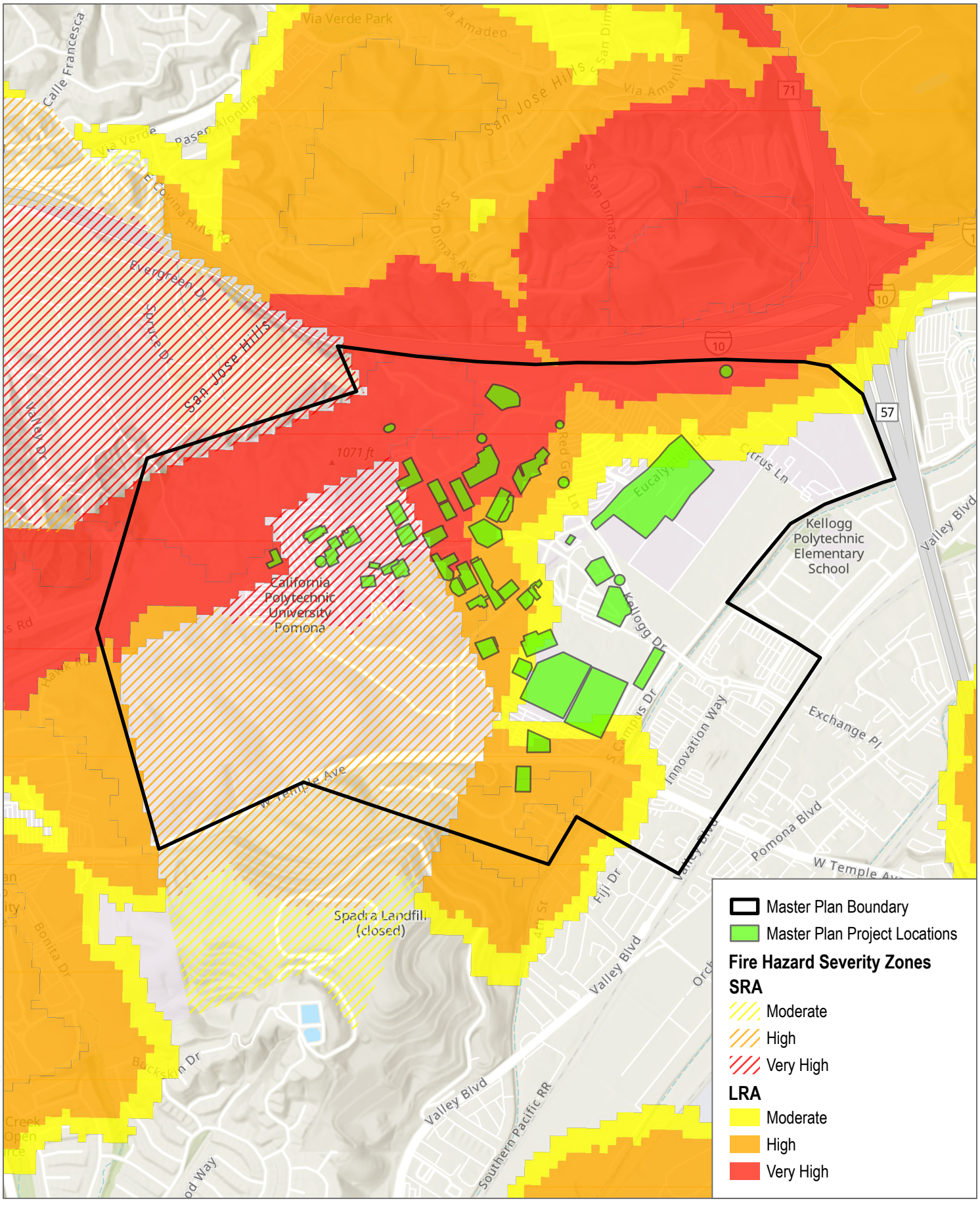
Kellogg Polytechnic Elementary School, 610 Medina Avenue, adjoins the main campus to the east, and I-Poly High School is located on the main campus, in Building 85 on the north side of West Temple Avenue. Development to be implemented as part of the proposed Master Plan (Chapter 3, Project Description, Figure 3-3) would not be located within 0.25 miles of Kellogg Polytechnic Elementary School. However, renovations to I-Poly High School are proposed as part of the proposed Master Plan (Building 85 on Figure 3-3), and other proposed renovations will be located within 0.25 miles of I-Poly High School.

4.10.1.5 Airports

Brackett Field Airport, 1615 McKinley Avenue in LaVerne, California, is located approximately 2.25 miles north-northeast of the main campus. The airport influence area, as defined in the airport land use compatibility plan

[1] On Figure 4.10-2, Wildland Urban Interface is dense residential housing adjacent to vegetation that can burn in a wildfire (purple on the figure); Wildland Urban Intermix is housing development interspersed in an area dominated by wildland vegetation subject to wildfire (blue on the figure); and Wildfire Influence Zone is wildfire susceptible vegetation up to 1.5 miles from the Wildland Urban Interface or Wildland Urban Intermix (green on the figure).

(LACALUC 2015), overlaps the northeastern portion of the main campus, specifically the Critical Airspace Protection Zones defined under Federal Acquisition Regulation Part 77 (Code of Federal Regulations Title 14 Part 77.9, further discussed in Section 4.10.2, below). The Federal Aviation Administration (FAA) Obstruction Evaluation Notice Criteria Tool was used to evaluate notification requirements for construction within the area of the main campus that overlaps the airport influence area. Based on the latitude and longitude of the proposed projects in this area, notice criteria under 14 CFR Part 77.9 is not exceeded, and therefore notification is not required.



SOURCE: USGS National Map 2025; CALFIRE 2025

DUDEK

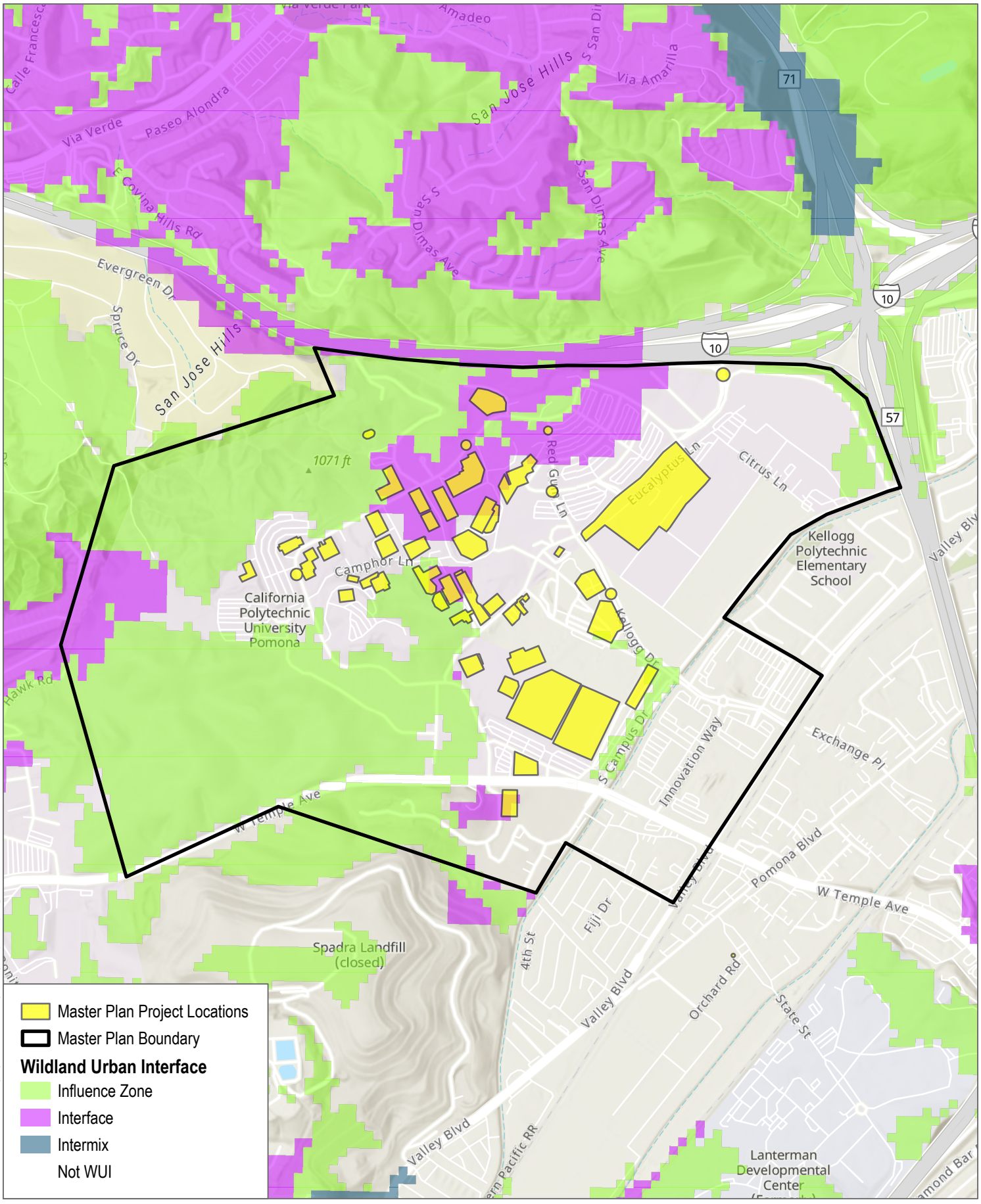
0 500 1,000 Feet

FIGURE 4.10-1

Fire Hazard Severity Zones

Cal Poly Pomona Campus Master Plan EIR

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SOURCE: World Topo; CALFIRE 2025, Cal Poly Pomona

DUDEK

0 500 1,000 Feet

FIGURE 4.10-2

Wildland Urban Interface

Cal Poly Pomona Campus Master Plan EIR

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4.10.2 Regulatory Setting

4.10.2.1 Federal

U.S. Environmental Protection Agency

Title 40 USC, Chapter 1, Subchapter I, Parts 260-265 – Solid Waste Disposal Act/ Federal Resource Conservation and Recovery Act of 1976

The Solid Waste Disposal Act, as amended and revised by the Resource Conservation and Recovery Act (RCRA), establishes requirements for the management of solid wastes (including hazardous wastes), landfills, underground storage tanks (USTs), and certain medical wastes. The statute also addresses program administration; implementation and delegation to the states; enforcement provisions and responsibilities; and research, training, and grant funding. Provisions are established for the generation, storage, treatment, and disposal of hazardous waste, including requirements addressing generator recordkeeping, labeling, shipping paper management, placarding, emergency response information, training, and security plans.

Title 40 USC, Chapter 1, Subchapter I, Part 273 – Universal Waste

This regulation governs the collection and management of widely generated waste, including batteries, pesticides, mercury-containing equipment, and bulbs. This regulation streamlines the hazardous waste management standards and ensures that such waste is diverted to the appropriate treatment or recycling facility.

Title 40 USC, Chapter 1, Subchapter D, Part 112 – Oil Pollution Prevention

Oil Pollution Prevention regulations require the preparation of a spill prevention, control, and countermeasure (SPCC) Plan if oil is stored in excess of 1,320 gallons in aboveground storage (or have a buried capacity of 42,000 gallons). SPCC regulations place restrictions on the management of petroleum materials and, therefore, have some bearing on hazardous materials management.

Title 40 USC, Chapter 1, Subchapter C, Part 61 – National Emission Standards for Hazardous Air Pollutants, Subpart M – National Emission Standard for Asbestos

This regulation established National Emission Standards for Hazardous Air Pollutants (NESHAP) and names ACM as one of these materials. ACM use, removal, and disposal are regulated by EPA under this law. In addition, notification of friable ACM removal prior to a proposed demolition project is required by this law.

Title 42 U.S. Code of Federal Regulations, Chapter 116 – Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) provides for public access to information about chemical hazards. The EPCRA and its regulations included in Title 40 USC Parts 350-372 establish four types of reporting obligations for facilities storing or managing specified chemicals: emergency planning, emergency release notification, hazardous chemical storage reporting requirements, and toxic chemical release inventory. EPA maintains a database, termed the Toxic Release Inventory, which includes information on reportable releases to the environment.

Title 15 USC, Chapter 53, Subchapter I, Section 2601 et seq. – Toxic Substances Control Act of 1976

The Toxic Substances Control Act of 1976 empowers EPA to require reporting, recordkeeping, and testing, as well as to place restrictions on the use and handling of chemical substances and mixtures. This regulation phased out the use of asbestos and ACM in new building materials and also sets requirements for the use, handling, and disposal of ACM as well as for lead-based paint (LBP) waste. As discussed above, EPA has also established NESHAP, which governs the use, removal, and disposal of ACM as a hazardous air pollutant and mandate the removal of friable ACM before a building is demolished and require notification before demolition. In addition to asbestos, ACM, and LBP requirements, this regulation also banned the manufacturing of polychlorinated biphenyls (PCBs) and sets standards for the use and disposal of existing PCB-containing equipment or materials.

Regional Screening Levels (RSLs)

The federal EPA provides regional screening levels for chemical contaminants to provide comparison values for residential and commercial/industrial exposures to soil, air, and tap water (drinking water). RSLs are available on EPA's website and provide a screening level calculation tool to assist risk assessors, remediation project managers, and others involved with risk assessment and decision-making. RSLs are also used when a site is initially investigated to determine if potentially significant levels of contamination are present to warrant further investigation. In California, the Department of Toxic Substances Control (DTSC) Human and Ecological Risk Office (HERO) incorporated the EPA RSLs into the HERO human health risk assessment (HHRA). HERO created Human HHRA Note 3, which incorporates HERO recommendations and DTSC-modified screening levels (DTSC-SLs) based on review of the EPA RSLs. The DTSC-SL should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

U.S. Department of Labor, Occupational Safety and Health Administration

Title 29 USC, Part 1926 et seq. – Safety and Health Regulations for Construction

These standards require employee training; personal protective equipment; safety equipment; and written procedures, programs, and plans for ensuring worker safety when working with hazardous materials or in hazardous work environments during construction activities, including renovations and demolition projects and the handling, storage, and use of explosives. These standards also provide rules for the removal and disposal of asbestos, lead, LBP, and other lead materials. Although intended primarily to protect worker health and safety, these requirements also guide general facility safety. This regulation also requires that an engineering survey is prepared prior to demolition.

Title 29 USC, Part 1910 et seq. – Occupational Safety and Health Standards

Under this regulation, facilities that use, store, manufacture, handle, process, or move hazardous materials are required to conduct employee safety training; inventory safety equipment relevant to potential hazards; have knowledge on safety equipment use; prepare an illness prevention program; provide hazardous substance exposure warnings; prepare an emergency response plan, and prepare a fire prevention plan.

U.S. Department of Transportation

Title 49 USC, Part 172, Subchapter C – Shipping Papers

The Department of Transportation established standards for the transport of hazardous materials and hazardous wastes. The standards include requirements for labeling, packaging, and shipping hazardous materials and hazardous wastes, as well as training requirements for personnel completing shipping papers and manifests.

Federal Aviation Administration

Title 14 USC, Chapter 1, Subchapter E, Part 77 – Aeronautics and Space – Safe, Efficient Use, and Preservation of the Navigable Airspace

This regulation establishes requirements for notifying the FAA of certain construction activities and alterations to existing structures, in order to ensure there are no obstructions to navigable airspace. For example, projects that include construction or alteration exceeding 200 feet in height above ground level are required to notify the FAA.

Federal Response Plan

The Federal Response Plan of 1999, as amended in 2003 (FEMA 2003) is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency.

International Fire Code

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code use a hazard classification system to determine what measures are required to protect against structural fires. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, IFC employs a permit system based on hazard classification. The IFC is updated every 3 years.

4.4.2.2 State

California Unified Program for Management of Hazardous Waste and Materials

California Health and Safety Code (HSC), Division 20, Chapter 6.11, Sections 25404- 25404.9 – Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Under the CalEPA, the DTSC and Enforcement and Emergency Response Program administer the technical implementation of California's Unified Program, which consolidates the administration, permit, inspection, and enforcement activities of several environmental and emergency management programs at the local level (DTSC

2019). Certified Unified Program Agencies (CUPAs) implement hazardous waste and materials standards. This program was established under the amendments to the California HSC made by SB 1082 in 1994. The programs that make up the Unified Program are:

- Aboveground Petroleum Storage Act Program
- Area Plans for Hazardous Materials Emergencies
- California Accidental Release Prevention (CalARP) Program
- Hazardous Materials Release Response Plans and Inventories (Hazardous Materials Business Plans, or HMBPs)
- Hazardous Material Management Plan and Hazardous Material Inventory Statements
- Hazardous Waste Generator and On-Site Hazardous Waste Treatment (Tiered Permitting) Program
- Underground Storage Tank Program

The CUPA for the proposed Master Plan area is the Los Angeles County Fire Department.

Title 19 CCR, Chapter 2, Subchapter 3, Sections 2729-2734/California HSC Division 20, Chapter 6.95, Sections 25500–25520

This regulation requires the preparation of a Hazardous Materials Business Plan (HMBP) by facility operators. The HMBP identifies the hazards, storage locations, and storage quantities for each hazardous chemical stored on site. The HMBP is submitted to the CUPA for emergency planning purposes. The proposed Master Plan area is currently subject to these requirements and there is an HMBP in place.

Hazardous Waste Management

Title 22 CCR, Division 4.5 – Environmental Health Standards for the Management of Hazardous Waste

In the State of California, the DTSC regulates hazardous wastes. These regulations establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the California Hazardous Waste Control Act and federal Resource Conservation and Recovery Act (RCRA). As with federal requirements, waste generators must determine if their wastes are hazardous according to specified characteristics or lists of wastes. Hazardous waste generators must obtain identification numbers; prepare manifests before transporting waste off-site; and use only permitted treatment, storage, and disposal facilities. Standards also include requirements for recordkeeping, reporting, packaging, and labeling. Additionally, while not a federal requirement, California requires that hazardous waste be transported by registered hazardous waste transporters.

In addition, Chapter 31 – Waste Minimization, Article 1 – Pollution Prevention and the Hazardous Waste Source Reduction and Management Review of these regulations require that generators of 12,000 kilograms/year of typical, operational hazardous waste evaluate their waste streams every four years and, as applicable, select and implement viable source reduction alternatives. This Act does not apply to non-typical hazardous waste, including ACM and PCBs, among others.

Title 22 California HSC, Division 20, Chapter 6.5 – California Hazardous Waste Control Act of 1972

This legislation created the framework under which hazardous wastes must be managed in California. It provides for the development of a state hazardous waste program (regulated by DTSC) that administers and implements the provisions of the federal RCRA program. It also provides for the designation of California-only hazardous wastes and development of standards that are equal to or, in some cases, more stringent than, federal requirements. The CUPA is responsible for implementing some elements of the law at the local level.

Human Health Risk Assessment Note 3 –DTSC-Modified Screening Levels (DTSC-SLs)

HHRA Note Number 3 presents recommended screening levels (derived from the EPA RSLs using DTSC-modified exposure and toxicity factors) for constituents in soil, tap water, and ambient air. The DTSC-RSL should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

Aboveground and Underground Petroleum Storage Tanks

Title 22 California HSC, Division 20, Chapter 6.67, Sections 25270 to 25270.13 – Aboveground Petroleum Storage Act

This law applies if a facility is subject to SPCC regulations under Title 40 USC Part 112, or if the facility has 10,000 gallons or more of petroleum in any or combination of aboveground storage tanks and connecting pipes. If a facility exceeds these criteria, it must prepare a SPCC plan.

Low-Threat Underground Storage Tank Case Closure Policy

This policy applies to petroleum UST sites subject to Chapter 6.7 of the Health and Safety Code. This policy establishes both general and media-specific criteria. If both the general and applicable media-specific criteria are satisfied, then the leaking UST case is generally considered to present a low threat to human health, safety and the environment. This policy recognizes, however, that even if all of the specified criteria in the policy are met, there may be unique attributes of the case or site-specific conditions that increase the risk associated with the residual petroleum constituents. In these cases, the regulatory agency overseeing corrective action at the site must identify the conditions that make case closure under the policy inappropriate.

Regional Water Boards and local agencies have been directed to review all cases in the petroleum UST Cleanup Program using the framework provided in this policy. These case reviews shall, at a minimum, include the following for each UST case:

1. Determination of whether or not each UST case meets the criteria in this policy or is otherwise appropriate for closure based on a site-specific analysis.
2. If the case does not satisfy the criteria in this policy or does not present a low-risk based upon a site-specific analysis, impediments to closure shall be identified.
3. Each case review shall be made publicly available on the State Water Board's GeoTracker web site in a format acceptable to the Executive Director.

Environmental Cleanup Levels

Environmental Screening Levels

Environmental Screening Levels (ESLs) provide conservative screening levels for over 100 chemicals found at sites with contaminated soil and groundwater. They are intended to help expedite the identification and evaluation of potential environmental concerns at contaminated sites. The ESLs were developed by San Francisco Bay Regional Water Quality Control Board; however, they are used throughout the state. While ESLs are not intended to establish policy or regulation, they can be used as a conservative screening level for sites with contamination. Other agencies in California currently use the ESLs (as opposed to RSLs). In general, the ESLs could be used at any site in the State of California, provided all stakeholders agree (SFBRWQCB 2019). In recent experience, regulatory agencies in various regions use ESLs as regulatory cleanup levels. The ESLs are not generally used at sites where the contamination is solely related to a LUST; those sites are instead subject to the Low-Threat Underground Storage Tank Closure Policy.

California Integrated Waste Management Board

Title 14 CCR, Division 7, Chapter 8.2 – Electronic Waste Recovery and Recycling Act of 2003

This regulation sets requirements regarding the use and disposal of hazardous substances in electronics. When discarded, the DTSC considers the following materials manufactured before 2006 to be hazardous waste: cathode ray tube devices, liquid crystal display (LCD) desktop monitors, laptop computers with LCD displays, LCD televisions, plasma televisions, and portable DVD Players with LCD screens.

California Department of Transportation/California Highway Patrol

Title 13 CCR, Division 2, Chapter 6

California regulates the transportation of hazardous waste originating or passing through the state. The California Highway Patrol (CHP) and the California Department of Transportation (Caltrans) have primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies. CHP enforces materials and hazardous waste labeling and packing regulations that prevent leakage and spills of material in transit and provides detailed information to cleanup crews in the event of an incident. Vehicle and equipment inspection, shipment preparation, container identification, and shipping documentation are all part of the responsibility of CHP. CHP conducts regular inspections of licensed transporters to ensure regulatory compliance. Caltrans has emergency chemical spill identification teams at locations throughout the state. Hazardous waste must be regularly removed from generating sites by licensed hazardous waste transporters. Transported materials must be accompanied by hazardous waste manifests.

Occupational Safety and Health

Title 8 CCR – Safety Orders

Under the California Occupational Safety and Health Act of 1973, the California Occupational Safety and Health Administration (Cal/OSHA) is responsible for ensuring safe and healthful working conditions for California workers. Cal/OSHA assumes primary responsibility for developing and enforcing workplace safety regulations in Title 8 of the CCR. Cal/OSHA hazardous substances regulations include requirements for safety training, availability of safety equipment, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation.

Cal/OSHA also enforces hazard communication program regulations, which contain training and information requirements, including procedures for identifying and labeling hazardous substances. The hazard communication program also requires that Material Safety Data Sheets be available to employees and that employee information and training programs be documented.

In Division 1, Chapter 4, Subchapter 4 – Construction Safety Orders of Title 8, construction safety orders are listed and include rules for demolition, excavation, explosives work, working around fumes and vapors, pile driving, vehicle and traffic control, crane operation, scaffolding, fall protection, and fire protection and prevention, among others.

Cal/OSHA Asbestos and Carcinogen Unit enforces asbestos standards in construction, shipyards, and general industry. This includes identification and removal requirements of asbestos in buildings, as well as health and safety requirements of employees performing work under the Asbestos-In-Construction regulations 8 CCR 1529. Only a Cal/OSHA-Certified Asbestos Consultant can provide asbestos consulting (as defined by the Business and Professions Code, 7180–7189.7, and triggered by the same size and concentration triggers as for registered contractors). These services include building inspection, abatement project design, contract administration, supervision of site surveillance technicians, sample collection, preparation of asbestos management plans, and clearance air monitoring.

Asbestos and Air Quality

Enforcement of the NESHAP Regulation, HSC Section 39658(b)(1)

The California Air Resources Board (CARB) is responsible for overseeing compliance with the federal asbestos NESHAPs in Los Angeles County. The asbestos NESHAP Program enforces compliance with the federal NESHAP regulation for asbestos and investigates all related complaints, as specified by HSC Section 39658(b)(1). Of the 35 air districts in California, 16 of these districts do not have an asbestos program in place. In these "non-delegated" districts, a demolition/renovation notification is required for compliance with the asbestos NESHAP. (This notification is not equivalent to a permit.) CARB reviews and investigates the notifications. The program also administers two annual statewide asbestos NESHAP task force meetings for air districts and EPA to facilitate communication and enforcement continuity and assists EPA in training district staff to enforce the asbestos NESHAP.

Contractors State License Board

The California Department of Consumer Affairs Contractors State License Board manages the licensing of asbestos abatement contractors.

Lead-Based Paint

The California Department of Public Health enforces laws and regulations related to the prevention of lead poisoning in children, prevention of lead poisoning in occupational workers, accreditation and training for construction-related activities, lead exposure screening and reporting, disclosures, and limitations on the amount of lead found in products. Accredited lead specialists are required to find and abate lead hazards in a construction project and to perform lead-related construction work in an effective and safe manner. The specific regulations include California Health and Safety Code Sections 17920.10, 17961, 17980, 105185 to 105197, 105250 to 105257, 105275 to 105310, 116875 to 116880, and 124125 to 124165; California Civil Code Sections 1102

to 1102.16, and 1941.1; California Education Code Sections 32240 to 32245; and California Labor Code Sections 6716 to 6717.

California Building Standards Commission

Title 24 of the CCR – California Building Standards Code

The California Building Standards Code is a compilation of three types of building standards from three different sources:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes
- Building standards that have been adopted and adapted from the national model code standards to meet California conditions
- Building standards, authorized by the California legislature, that constitute extensive additions not covered by the model codes that have been adopted to address particular California concerns

Among other rules, the Code contains requirements regarding the storage and handling of hazardous materials.

California Emergency Services Act

Under the Emergency Services Act (California Government Code, Section 8550 et seq.), the State of California developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an integral part of the plan, which is administered by the Governor's Office of Emergency Services. The Office of Emergency Services coordinates the responses of other agencies, including the EPA, CHP, Regional Water Quality Control Boards, air quality management districts, and county disaster response offices.

California Accidental Release Prevention Program (CalARP)

Similar to the EPA Risk Management Program, the CalARP Program (19 CCR 2735.1 et seq.) regulates facilities that use or store regulated substances, such as toxic or flammable chemicals, in quantities that exceed established thresholds. Under the regulations, industrial facilities that handle hazardous materials above threshold quantities are required to prepare and submit an HMBP to the local CUPA via the California Environmental Reporting System. As part of the HMBP, a facility is further required to specify applicability of other state regulatory programs. The overall purpose of CalARP is to prevent accidental releases of regulated substances and reduce the severity of releases that may occur. The CalARP Program meets the requirements of the EPA Risk Management Program, which was established pursuant to the Clean Air Act Amendments.

California Dig Alert

In accordance with California Government Code 4216.2, an excavator planning to conduct an excavation shall notify the appropriate regional notification center of the intent to excavate between 2 and 14 calendar days prior to excavation activities. When the excavation is proposed within 10 feet of a "high priority subsurface installation," which includes high pressure natural gas and petroleum pipelines, the operator of the high priority subsurface installation shall notify the excavator of the existing of the installation and set up an on-site meeting to determine actions required to verify location and prevent damage to the installation. The excavator shall not begin excavating until the on-site meeting is complete.

California Building Code

The California Building Code (CBC), contained in Part 2 of Title 24 of the California Code of Regulations, identifies building design standards, including those for fire safety. Typical fire safety requirements of the CBC include the installation of fire sprinklers in all new high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

Chapter 7A of the CBC, Materials and Methods for Exterior Wildfire Exposure, establishes minimum standards for buildings located in any Fire Hazard Severity Zone within SRAs or any Wildland–Urban Interface Fire Area to resist the intrusion of flames or burning embers projected by a vegetation fire. Chapter 7A of the CBC regulates building materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a wildland–urban interface fire area. The proposed Master Plan area is located in such an area and therefore compliance with Chapter 7A is required. The purpose of CBC Chapter 7A is to establish minimum standards for the protection of life and property by increasing the ability of a building located in any fire hazard severity zone within a State Responsibility Area or a wildland–urban interface fire area to resist the intrusion of flames or burning embers projected by a vegetation fire, and to contribute to a systematic reduction in fire losses. The code includes provisions for building materials, infrastructure, defensible space, site access, and fire protection systems (e.g., water, fire flow, fire hydrants, interior fire sprinklers). Building material requirements address roofs, eaves, exterior walls, vents, appendages, windows, and doors, ultimately resulting in hardened structures that have been proven to perform at high levels (resist ignition) during a typically short duration of exposure to burning vegetation from wildfires. New buildings located in such areas must comply with the ignition-resistant construction standards outlined in CBC Chapter 7A.

California Fire Code

The California Fire Code (CFC) incorporates, by adoption, the IFC of the International Code Council, with California amendments. The CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. Chapter 49 of the CFC, Requirements for Wildland–Urban Interface Fire Areas, prescribes construction materials and methods in Fire Hazard Severity Zones (FHSZs). These requirements generally parallel California Building Code (CBC) Chapter 7A. Additionally, Chapter 33 of the CFC provides provisions for fire safety during construction and demolition.

California Public Resources Code

California PRC Sections 4291 et seq. require that brush, flammable vegetation, or combustible growth be removed within 100 feet of buildings on or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land covered in flammable materials. In September 2020, Assembly Bill (AB) 3074 amended PRC Section 4291 to require stricter standards for fuel reduction. The amendment stipulates that within the 100 feet of structures, more intense fuel reduction is to occur between 5 and 30 feet around the structure, and within 5 feet of the structure is to be the ember-resistant zone.

California PRC Section 4290 requires the State Board of Forestry and Fire Protection to adopt regulations implementing minimum fire safety standards for defensible space that would be applicable to lands within the SRA and lands within Very High FHSZs. Requirements in the PRC include information on:

- Road standards for fire equipment access
- Standards for signs identifying streets, roads, and buildings
- Minimum private water supply reserves for emergency fire use
- Fuel breaks and greenbelts
- Basic emergency access

California PRC Section 4442 regulates the use of internal combustion engines that use hydrocarbon fuels on forest-covered land, brush-covered land, and grass-covered land. Internal combustion engines, like those used in construction, must be equipped with a spark arrester, which is a device used for removing and retaining carbon and other flammable particles from the exhaust flow for engines that use hydrocarbon fuels. These engines must be maintained in effective working order or be constructed, equipped, and maintained for the prevention of fire.

Natural Resources (CCR Title 14)

Title 14, Division 1.5, Chapter 7, Subchapter 3, Fire Hazard, also sets forth requirements for defensible space if the distances specified above cannot be met. For example, options that have similar practical effects include non-combustible block walls or fences, 5 feet of noncombustible material horizontally around the structure, installing hardscape landscaping or reducing exposed windows on the side of the structure with a less-than-30-foot setback, or additional structure hardening such as those required in the CBC, California Code of Regulations Title 24, Part 2, Chapter 7A.

California Forestry and Fire Protection

2024 Strategic Fire Plan for California

Public Resources Code Sections 4114 and 4130 authorize the State Board of Forestry to establish a fire plan that establishes the levels of statewide fire protection services for SRA lands. These levels of service recognize other fire protection resources at the federal and local level that collectively provide a regional and statewide emergency response capability. In addition, California's integrated mutual aid fire protection system provides fire protection services through automatic and mutual aid agreements for fire incidents across all ownerships. The California Fire Plan is the state's road map for reducing the risk of wildfire through planning and prevention to reduce firefighting costs and property losses, increase firefighter safety, and to contribute to ecosystem health.

California State University Policies

The California State University (CSU) has several systemwide policies related to health and safety, as described below.

Executive Order 1039

The Executive Order (EO) 1039 is issued pursuant to the Standing Orders of the Trustees. Through adoption of the following statement of policy, the CSU recognizes Occupational Health and Safety (e.g., Environmental Health & Safety or EH&S) as an integral function throughout the CSU system. EH&S includes policies and practices designed to mitigate the risk of injury and illness to CSU employees and to promote campus health and safety programs.

These injuries and/or illnesses may arise from work-related activities in the form of accidents, or exposure to potentially harmful practices, conditions, substances, and equipment. Certain types of student activities are also addressed. The CSU, its officers, and employees are responsible for developing and maintaining injury and illness prevention programs and ensuring that activities and tasks are performed in a manner that reasonably control hazards that can cause injuries or illnesses.

Executive Order 1056

EO 1056 requires each campus to develop and maintain an emergency management program that can be activated when a hazardous condition, natural or human-made disaster reaches, or has the potential for reaching, proportions beyond the capacity of routine campus operations. The President of each campus is delegated the responsibility for the development, implementation, and maintenance of an emergency management program on campus and for ensuring the stated management activities are accomplished in support of the campus emergency management program.

Executive Order 1107

EO 1107 provides direction on implementing Jeanne Clery Disclosure of Campus Safety Security Policy and Campus Crime Statistics Act, commonly referred to as the Clery Act (20 USC Section 1092(f)). The EO indicates that the CSU is committed to promoting the safety and security of its campus communities to provide a supportive and accessible living, learning, and working environment. It is further committed to identifying conditions or circumstances that may pose risks to the safety and security of the CSU and preparing the CSU to respond effectively to emergencies. Accordingly, each CSU campus is required to comply with the requirements of the Clery Act. Related to environmental hazards, the policy outlines the procedures campuses are required to use to immediately notify the campus community upon the confirmation of a significant emergency or dangerous situation on the campus involving an immediate threat to the health or safety of students or employees (e.g., hazardous chemical spill, fire, earthquake, building collapse).

CSU Policies Related to California Building, Fire, and Health and Safety Codes

CSU policy provides required procedures to be used during planning, design and construction of buildings and other facilities on CSU campuses (CSU 2024a and 2024b). Based on these procedures, a hazardous materials report will be prepared during the schematic design phase of a project. Based on the results of this report, hazardous materials abatement documents will be prepared to address known or suspected conditions related to existing contamination on a project site or within an existing building that may be subject to demolition or reconstruction. Hazardous materials and abatement reports are then included in construction bid documents so that construction contractors can provide for proper abatement of known or suspected conditions during project construction (CSU 2024a).

Additionally, applicable regulations address building standards including roofing and roof access, fire flow (water) infrastructure, design of hydrant systems, fire protection systems (sprinklers and alarms), fire extinguishers, and structure egress. New development must also comply with access requirements (primary and secondary), provide adequate fire lanes, and maintain defensible space. The CSU's Office of Fire Safety performs an access compliance review and a fire and life safety review, respectively, prior to approval of individual project drawings and specification documents (CSU 2024b).

4.10.2.3 Local

As a state entity, Cal Poly Pomona is not subject to local government permitting or regulations, policies, or ordinances, such as the general plans and ordinances for the City of Pomona, City of Walnut, or the County of Los Angeles. Because Cal Poly Pomona is subject to neither local general plans nor other local land use plans and/or ordinances, these regulations are not summarized here or further analyzed in this section.

As discussed under the state regulations, the Los Angeles County Fire Department is the local CUPA for the proposed Master Plan area. As the CUPA, they are responsible for implementing state regulations under HSC Division 20, Chapter 6.11. As such, reporting requirements for hazardous materials management, aboveground petroleum storage, hazardous waste generation, and other programs under the aforementioned regulation will be completed under Los Angeles County Fire Department.

4.10.3 Thresholds of Significance and Methodology

4.10.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, California Environmental Quality Act (CEQA) Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section15064.7). The significance criteria used to evaluate the proposed Master Plan's impacts to hazards and hazardous materials are based on CEQA Guidelines Appendix G. For the purposes of this project, a potentially significant impact to hazards and hazardous materials would occur if the proposed Master Plan would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as result, would it create a significant hazard to the public or the environment.
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.
8. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

9. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
10. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

4.10.3.2 Methodology

A review of applicable regulatory records was conducted to characterize the existing environmental setting in the study area, as described in Section 4.10.1, Environmental Setting, and to identify any existing hazardous materials sites on or near the proposed Master Plan area that could affect project implementation. The impact analysis assumes that proposed Master Plan development would be constructed and operated in compliance with the most current policies and regulations related to hazards and hazardous materials, as described in Section 4.10.2, Regulatory Setting.

4.10.4 Impact Analysis

4.10.4.1 Project Impacts

Impact 4.10-1 The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (Less than Significant)

Program-Level Analysis for Master Plan

Construction

The proposed Master Plan includes multiple individual projects, mainly demolition or renovation of existing buildings, and construction of new buildings. Hazardous materials that may be used during construction and demolition activities include gasoline, diesel fuel, oil, lubricants, grease, welding gases (e.g., acetylene, oxygen, and argon), solvents, and paints. These materials would be used and stored in designated construction staging areas within the boundaries of the proposed Master Plan (main campus) and would be transported, handled, and disposed of in accordance with all applicable federal, state, and local laws and regulations. The use of these materials for their intended purpose would not pose a significant risk to the public or environment. Hazardous wastes accumulated during construction activities may include unused paint and primer, paint thinner, solvents, and vehicle and equipment maintenance-related materials, many of which can be recycled. Empty containers for such materials (e.g., drums and totes) may also be returned to vendors, if possible. The use of these substances is subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials. In particular, accident prevention and containment are the responsibility of the construction contractors, and provisions to properly manage hazardous substances and wastes are included in standard CSU construction specifications (CSU 2024a). Additionally, individual developments under the proposed Master Plan would be required to comply with the State Water Resources Board Construction General Permit, which requires a stormwater pollution prevention plan (SWPPP) and development of best management practices (BMPs) for all phases of construction on sites greater than 1 acre (see Section 4.10, Hydrology and Water Quality, for additional information about this requirement). Implementation of a SWPPP would

avoid or minimize release of hazardous materials from construction sites by including water quality BMPs designed to prevent pollutants from becoming mobilized by stormwater runoff.

As discussed in Section 4.10.1.1, Historical Site Uses, based on the age of the structures, there is a potential for hazardous building materials to be present. Renovation or demolition of these structures, as well as transportation and disposal of the building materials could cause a release of these materials to the environment, if not properly handled. However, building renovation and demolition activities that involve the potential for ACM, LBP, and universal wastes would be completed in accordance with the following federal and state regulations:

- For asbestos: Title 40 USC, Chapter 1, Subchapter C, Part 61 – National Emission Standards for Hazardous Air Pollutants, HSC Section 39658(b)(1) – Enforcement of NESHAP by the State of California, California Contractors State License Board – Licensing of Abatement Contractors, SCAQMD Notifications and Fees under District Rule 1403.
- For lead: California Health and Safety Code Section 05250 – Lead-Related Construction Activities, California Civil Code Section 1941.1 and California Health and Safety Code Sections 17961, 17980, 124130, 17920.10, and 105251 to 105257 – Requirements for lead abatement contractor accreditation, California Labor Code Sections 6716 to 6717 – Requirements for health and safety of employees in lead-related construction work, and California Health and Safety Code Sections 105185 to 105197 – Occupational lead poisoning prevention program.
- For universal wastes: DTSC universal waste rules; CalRecycle; and EPA Solid Waste Rules (40 CFR Part 273).

Additionally, CSU policy provides procedures required to be used during planning, design and construction of buildings and other facilities on CSU campuses (see Section 4.10.2, Regulatory Setting). Based on these procedures, a hazardous materials report would be prepared during the schematic design phase of a project. The report includes locations and conditions of ACMs, lead-based paints, universal wastes, and other potentially hazardous materials present in the building. Based on the results of this report, hazardous materials abatement documents would be prepared to address known or suspected conditions related to existing contamination/hazardous building materials on a project site or within an existing building that may be subject to demolition or reconstruction. Hazardous materials and abatement reports are included in construction bid documents so that construction contractors can provide for proper abatement of known or suspected conditions during project construction (CSU 2024a). Therefore, the proposed Master Plan impact related to the creation of a significant risk to the public from the routine transport, use, or disposal of hazardous materials during construction would be **less than significant**.

Operation

The operational phase of the proposed Master Plan would be consistent with current campus operations and would not be expected to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Hazardous materials would be limited to use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. Although the proposed Master Plan would introduce commercially available potentially hazardous materials to future residents, employees, and visitors of the main campus, the use of these substances would be subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials. Therefore, operational impacts of the proposed Master Plan would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Construction

Construction of near-term projects would involve the use of relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents. Accident prevention and containment of these materials are the responsibility of the construction contractors, and provisions to properly manage hazardous substances and wastes are included in standard CSU construction specifications (CSU 2024a). Additionally, Cal Poly Pomona would be required to implement spill prevention and containment measures stipulated in SWPPPs for each near-term project site, given that the sites are greater than 1 acre. Near-term projects involving renovation of existing buildings may also result in removal of hazardous building materials. As discussed above, federal, state, and local rules require notification, proper abatement, and proper disposal of these materials, and CSU policy outlines procedures to identify, map, abate, and remove hazardous building materials. Therefore, the impact of near-term projects related to the creation of a significant risk to the public from the routine transport, use, or disposal of hazardous materials during construction would be **less than significant**.

Operation

While the operation of near-term projects may result in an incremental increase in the routine transport, use, and disposal of hazardous materials and/or wastes generated by routine campus operations, all hazardous materials would be managed in accordance with all applicable state and federal regulations. Therefore, use of hazardous materials during operation of near-term projects would not pose a significant risk to the public or environment due to the routine transport, use, or disposal of hazardous materials and the impact would be **less than significant**.

Impact 4.10-2 The project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, including due to the project being located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. (Potentially Significant)

Program-Level Analysis for Master Plan

Construction

Hazardous Materials and Soil Contamination. As discussed in Impact 4.10-1, renovation and demolition of existing structures would be conducted in accordance with applicable federal and state regulations. Additionally, a hazardous building materials survey and proper abatement of such materials would be conducted prior to demolition and renovation activities in accordance with CSU policy (CSU 2024a).

The Cortese List database search revealed documentation, prepared in 1996, that included a closed LUST case and a list of 21 operational USTs present throughout the main campus. The LUST site is considered a Cortese List site. The exact location of the LUST and the USTs, and the present-day status of the USTs, is unknown. There is a possibility that impacted soils are present around USTs and at the former LUST site, and if future proposed Master Plan construction results in damage to or improper decommissioning of USTs or associated infrastructure, this could result in a release of petroleum products to the environment. Therefore, construction impacts of the proposed Master Plan would be **potentially significant**.

MM-HAZ-1 (UST Inventory and Soil Management Plan [SMP]) requires the location and status of the LUST and all USTs be determined before execution of any projects proposed as part of the Master Plan. MM-HAZ-1 also requires any changes to the USTs or their piping or other features to be completed under the appropriate Los Angeles County Fire Department permits, and any future projects that require excavation into soils on or near current or former USTs or the LUST would be required to prepare and implement a SMP. With the implementation of MM-HAZ-1, construction impacts associated with potential releases from current or former USTs would be reduced to **less than significant**. (See Section 4.10.5, Mitigation Measures, for the full text of this mitigation measure.)

Groundwater. Groundwater monitoring completed by the southern adjoining Spadra Landfill revealed concentrations of chloroform above concentration limits set by the landfill permit. The most recent concentration, 1.4 µg/L, is also above present-day ESLs (SFBRWQCB 2019) for ingestion of tap water (0.22 µg/L) and residential vapor intrusion (0.81 µg/L) but is below the maximum contaminant level (MCL) of 80 µg/L (State of California 2024). For water supply, the MCL would be used. Depth to groundwater in the area, specifically near the Spadra Landfill, was most recently measured at 35 to 43 feet below ground surface (LACSD 2024b); as noted in Section 4.11, Hydrology and Water Quality, groundwater levels at the campus range from 15 to 25 feet below ground surface. Based on groundwater depths and proposed future projects within the proposed Master Plan, future construction is not anticipated to encounter groundwater. Therefore, impacts of the proposed Master Plan associated with the potential release of contaminated groundwater during construction would be **less than significant**.

Operation

Hazardous Materials and Soil Contamination. Once operational, the proposed Master Plan would not be expected to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or contaminated soils into the environment. Hazardous materials would be limited to use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. The use, storage and transportation of these substances is subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials. Therefore, operational impacts of the proposed Master Plan would be **less than significant**.

Groundwater. As discussed above and in Section 4.11, Hydrology and Water Quality, groundwater impacts have been identified in the Spadra Subbasin beneath the main campus, and groundwater wells on the main campus, in part, supply water to main campus facilities. Impacts include high nitrates, total dissolved solids, perchlorate, and volatile organic compounds. Due to the poor water quality in the Spadra Subbasin, Cal Poly Pomona has their own reverse osmosis water treatment plant that treats the contaminants identified in groundwater to meet drinking water standards (Appendix G). The chloroform observed during Spadra Landfill groundwater monitoring is a volatile organic compound and would, therefore, be treated by the reverse osmosis treatment system. Based on the findings of the 2023 Annual Water Quality Report (Cal Poly Pomona 2023), none of the contaminants evaluated by Cal Poly Pomona were identified above applicable screening levels. While chloroform is not directly analyzed, it is a disinfection byproduct and is analyzed under "total trihalomethanes" along with bromodichloromethane, bromoform, and dibromochloromethane (State of California 2024). The 2023 Annual Water Quality Report did not identify total trihalomethanes in the water supply above the MCL of 80 µg/L. Based on the available information, it is likely groundwater impacts would be treated by the on-site reverse osmosis water treatment system, thereby removing contaminants of concern in groundwater that could result in releases of hazardous materials to the environment, including potential human exposure. As such, operational impacts of the proposed Master Plan would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Construction

Renovation and demolition of existing structures would be conducted in accordance with applicable federal and state regulations. Additionally, a hazardous building materials survey and proper abatement of such materials would be conducted prior to demolition and renovation activities in accordance with CSU policy. The Cortese List database search revealed documentation of a closed LUST case and a list of 21 operational USTs present throughout the main campus. The exact location of the LUST and the USTs, and the present-day status of the USTs, is unknown. There is a possibility that impacted soils are present around USTs and at the former LUST site, and if near-term project construction results in damage to or improper decommissioning of USTs or their appurtenances, this could result in a release of petroleum products to the environment. Therefore, near-term project construction impacts associated with potential releases from current or former USTs would be **potentially significant**.

Near-term projects would implement MM-HAZ-1 (UST Inventory and SMP), which requires the location and status of the LUST and all USTs be determined before execution of any near-term projects. MM-HAZ-1 also requires any changes to the USTs or their piping or other features would be completed under the appropriate Los Angeles County Fire Department permits, and any future projects that require excavation into soils on or near current or former USTs or the LUST would be required to prepare and implement a SMP. Therefore, with the implementation of MM-HAZ-1, near-term project construction impacts associated with potential releases from current or former USTs would be reduced to **less than significant**. (See Section 4.10.5, Mitigation Measures, for the full text of this mitigation measure.)

Operation

Once operational, the near-term projects would not be expected to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Hazardous materials would be limited to use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. The use, storage and transportation of these substances is subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials.

As discussed above and in Section 4.11, Hydrology and Water Quality, groundwater impacts have been identified in the Spadra Subbasin beneath the main campus, and groundwater wells on the main campus, in part, supply water to main campus facilities. Based on the available information, it is likely groundwater impacts would be treated by the on-site reverse osmosis water treatment system, thereby removing contaminants of concern in groundwater that could result in releases of hazardous materials to the environment, including potential human exposure. As such, operational impacts of the near-term projects related to the potential for releases of hazardous materials into the environment would be **less than significant**.

Impact 4.10-3 The project could emit hazardous emissions or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (Potentially Significant)

Program-Level Analysis for Master Plan

Construction

As discussed in Section 4.10.1, Environmental Setting, there is one school on the main campus, and one school within 0.25 miles of the main campus. As described in Impact 4.10-1, hazardous materials that may be used during construction and demolition activities would be used and stored in designated construction staging areas within the boundaries of the proposed Master Plan area and would be transported, handled, and disposed of in accordance with all applicable federal, state, and local laws and regulations. The use of these materials for their intended purpose would not pose a significant risk to nearby schools. Hazardous wastes accumulated during project construction that cannot be recycled would be transported by a licensed hazardous waste hauler using a Uniform Hazardous Waste Manifest and disposed of at an appropriately permitted facility. The use of these substances is subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials. Additionally, completion of a hazardous materials report under CSU policy requirements would identify hazardous building materials, stored hazardous materials, and potential or confirmed contamination conditions prior to renovation or demolition activities (CSU 2024a). These reports would be used to prepare abatement plans to be implemented before/during proposed activities. This, in addition to adherence to state and federal rules and regulations, would minimize impacts due to hazardous building materials, as described in Impact 4.10-1.

As described in Impact 4.10-2, there is the potential that contaminated soils are present around areas of current or former USTs and/or the LUST site, and damage to USTs during construction could result in releases of hazardous materials near schools. Therefore, the impacts of the proposed Master Plan related to the potential release of hazardous materials near schools would be **potentially significant**.

MM-HAZ-1 (UST Inventory and SMP) requires proper inventory and location of all USTs and former USTs, and preparation of a SMP that outlines proper soil handling if contamination is encountered. Implementation of this mitigation measure would be sufficient to avoid emissions of hazardous materials near existing schools, and impacts of the proposed Master Plan would be reduced to **less than significant**. (See Section 4.10.5, Mitigation Measures, for the full text of this mitigation measure.)

Operation

Once operational, development under the proposed Master Plan would not be expected to create a significant hazard to nearby schools by emitting or handling hazardous materials. As discussed in Impact 4.10-1, hazardous materials would be limited to use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. The use of these substances is subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risks to the public and nearby schools associated with hazardous materials. As such, operational impacts of the proposed Master Plan would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Construction

As discussed above, there is one school on the main campus, and one school within 0.25 miles of the main campus. As described in Impact 4.10-1, hazardous materials that may be used during construction and demolition activities would be used and stored in designated construction staging areas for the near-term projects and would be transported, handled, and disposed of in accordance with all applicable federal, state, and local laws and regulations. As discussed above, renovation or demolition of existing structures has the potential to release hazardous building materials or universal waste items into the environment. However, completion of a hazardous materials report under CSU policy requirements would identify hazardous building materials, stored hazardous materials, and potential or confirmed contamination conditions prior to renovation or demolition activities. These reports would be used to prepare abatement plans to be implemented before/during proposed near-term project activities. This, in addition to adherence to state and federal rules and regulations, would reduce impacts due to hazardous building materials, as described in Impact 4.10-1.

As described in Impact 4.10-2, there is the potential that contaminated soils are present around areas of current or former USTs and/or the LUST site, and damage to USTs during construction could result in releases of hazardous materials near schools. Therefore, the impacts of the near-term projects related to the potential release of hazardous materials near schools would be **potentially significant**.

MM-HAZ-1 (UST Inventory and SMP) requires proper inventory and location of all USTs and former USTs, and preparation of an SMP that outlines proper soil handling if contamination is encountered. Implementation of this mitigation measure would be sufficient to avoid emissions of hazardous materials near existing schools, and impacts of the near-term projects would be reduced to **less than significant**. (See Section 4.10.5, Mitigation Measures, for the full text of this mitigation measure.)

Operation

Once operational, near-term projects would not be expected to create a significant hazard to nearby schools by emitting or handling hazardous materials. As discussed in Impact 4.10-1, hazardous materials would be limited to use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. The use of these substances is subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public and nearby schools associated with hazardous materials. As such, operational impacts of the near-term projects would be **less than significant**.

Impact 4.10-4 The project would not result in a safety hazard or excessive noise associated with airport noise for people residing or working in the project area. (Less than Significant)

Program-Level Analysis for Master Plan

A portion of the main campus overlaps the airport influence area of the Brackett Field Airport. The area of overlap is for FAA notification criteria under 14 CFR 77.9 and requires notification to the FAA in the event construction exceeds the requirements set forth in the regulation. Based on a review using the FAA's Notice Criteria Tool (FAA 2024), the proposed Master Plan area within the overlap area does not appear to have filing requirements, and as

such no action is required for future proposed projects currently planned within the proposed Master Plan area. If future projects trigger FAA notification under 14 CFR 77.9, notification must be made to the FAA within 45 days of construction in accordance with federal regulations. With the adherence to this regulation, the proposed Master Plan would not result in safety hazards or excessive noise due to the proximity of an airport and the impact would be **less than significant**.

Project-Level Analysis for Near-Term Projects

If near-term projects trigger FAA notification under 14 CFR 77.9, notification must be made to the FAA within 45 days of construction in accordance with federal regulations. With the adherence to this regulation, the near-term projects would not result in safety hazards or excessive noise due to the proximity of an airport and the impact would be **less than significant**.

Impact 4.10-5 The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (Less than Significant)

Program-Level Analysis for Master Plan

All development under the proposed Master Plan would be designed, constructed, and maintained to comply with applicable local, regional, state, and/or federal requirements related to emergency access and evacuation. The Division of the State Architect and the CSU's Office of Fire Safety would perform an access compliance review and a fire and life safety review, respectively, prior to approval of individual project drawings and specification documents (CSU 2024).

An emergency plan describes a comprehensive emergency management system that provides for the planned response to disaster situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. The County of Los Angeles and all cities within the County use the Operational Area EOP to respond to major emergencies and disasters. The Operational Area EOP identifies a broad range of potential hazards and a response plan (County of Los Angeles 2023). While evacuation routes are not identified in the Operational Area EOP, typically evacuation routes consist of the major interstates, highways, and prime arterials. Nearby potential evacuation routes nearest to the proposed Master Plan area include the I-10 Freeway (located immediately north of the campus), State Route (SR) 57 (located immediately east of the campus), and SR-60 (located 2 miles south of the campus). However, specific evacuation routes would be determined based on the location and extent of the incident.

The Cal Poly Pomona EOP establishes the emergency organization, assigns tasks, specifies policies and general procedures, and provides for coordination of planning efforts of the various emergency staff and service elements of the jurisdiction. The Cal Poly Pomona EOP is an all-hazards plan that establishes a comprehensive framework for management of emergency events that occur on or near CSU property or can have significant impact on the Cal Poly Pomona community. The plan is designed to integrate with plans of Cal Poly Pomona's response partners and is consistent with Federal Emergency Management Agency and California Office of Emergency Services mandates. The Cal Poly Pomona EOP indicates evacuation routes are designated throughout the campus to get students and staff to local assembly areas, evacuation coordinators are assigned throughout campus, and evacuation drills are conducted for each building on a regular basis. For campus evacuation, West Temple Avenue, Kellogg Drive, and South Campus Drive provide direct routes off campus to major highways and freeways.

Overall, the proposed Master Plan would not impair implementation of or physically interfere with the Cal Poly Pomona EOP or the Operational Area EOP, as it would not have any effect on the framework or procedural guidance in these plans or otherwise affect plans for campus evacuation. Therefore, the proposed Master Plan would not interfere with adopted emergency response plans and the impact would be **less than significant**.

Project-Level Analysis for Near-Term Projects

All near-term projects under the proposed Master Plan would be designed, constructed, and maintained to comply with applicable local, regional, state, and/or federal requirements related to emergency access and evacuation. The Division of the State Architect and the CSU Office of Fire Safety would perform an access compliance review and a fire and life safety review, respectively, prior to approval of individual project drawings and specification documents (CSU 2024).

Near-term projects include campus-wide improvements to enhance pedestrian and bicyclist safety and expand access to public transit opportunities. Near-term projects also include Kellogg Drive and East Campus Drive roadway reconfiguration improvements, which includes an I-10 Gateway, and improvements to the existing Campus Loop, including the repaving and restriping of University Drive and improvements for shuttles. These improvements would improve safety for pedestrians and bicyclists and would not restrict emergency ingress or egress.

Overall, near-term projects would not impair implementation of or physically interfere with the Cal Poly Pomona EOP or the Operational Area EOP, as they would not have any effect on the framework or procedural guidance in these plans or otherwise affect plans for campus evacuation. Therefore, near-term projects would not interfere with adopted emergency response plans and the impact would be **less than significant**.

Impact 4.10-6 **The project could (1) expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, or (2) exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, due to slope, prevailing winds, and other factors. (Potentially Significant)**

Portions of the proposed Master Plan area are located within CAL FIRE-designated Fire Hazard Severity Zones, both within local and SRAs (CAL FIRE 2024). Figure 4.10-1 shows the areas within the main campus with designated Fire Hazard Severity Zones, including very high, high, and moderate. The portion of the campus that is designated as a VHFHSZ includes Voorhis Ecological Reserve, Parking Lot J, Parking Lot L, Parking Lot M, Parking Lot F1, Parking Lot F3, a portion of the agriculture field laboratory, and portions of the campus core and Kellogg West (specifically existing Buildings 1, 2, 3, 4, 4A, 5, 6, 7, 8, 9, 13/13A, 14, 17, 23, 24, 25, 32, 46, 71, 76, 76A, 77, 78, 79, 92, 94, 97, 98, 144, 193, as shown in Chapter 3, Project Description, Figure 3-2). While this area is mostly occupied by buildings and parking lots, the area is also occupied by flammable vegetation and slopes along the northern and northwestern edges of the built portion of the main campus. Such flammable vegetation and slopes are the drivers of such wildfire hazard designations. Additionally, the Agricultural portions of the Agricultural Field Laboratory and other campus buildings are located within a HFHSZ. The proposed Master Plan area is also partially within a WUI area that borders the western edge and northern edge of the campus and spans from the San Jose Hills ridgeline to the I-10 Freeway (see Figure 4.10-2).

Program-Level Analysis for Master Plan

Construction

As noted, the proposed Master Plan area is partially located within a VHFHSZ, and heat or sparks from construction equipment or vehicles, as well as the use of flammable materials, have the potential to ignite adjacent vegetation and start a fire, especially during weather events that include low humidity and high wind speeds that are typically experienced in the summer and fall, but can occur year-round in the Los Angeles region. The following construction-related equipment and practices have the potential to generate heat or sparks that could result in wildfire ignition:

- Earthmoving and excavating equipment, chainsaws and other small gas-powered equipment and tools can cause sparks that serve as a source of fire ignition.
- Tractors, graders, mowers, bulldozers, backhoes, cranes, excavators, trucks, and vehicles may result in heated exhaust which, if they come into contact with vegetation, may result in fire ignition.
- Welders consist of an open heat source that may result in metallic sparks, which could ignite vegetation.

The risk of potential ignitions resulting from construction activities would be considered very low for the majority of the proposed Master Plan area with non-combustible land cover. This is because most construction would occur within the interior of the campus core and paved areas. No construction is proposed in the Agricultural Field Laboratory in the VHFHSZ and the HFHSZ. New construction, demolition, and renovation projects along the northern and northwestern edges of the built portion of the main campus in the VHFHSZ (including Buildings 1, 2, 5, 6, 7, 8, 9, 10, 13/13A, 14, 17, 24, 25, 46, 76, 76A, 77, 78, 94, 97, 98, and 144, as shown in Chapter 3, Project Description, Figure 3-3) could be subject to increased ignition potential resulting from construction equipment and related activities due to the proximity of native vegetation communities. Therefore, the construction impacts of the proposed Master Plan related to wildfire risks would be **potentially significant.**

Implementation of MM-HAZ-2 (Construction Fire Prevention Plan) and MM-HAZ-3 (Construction Fire Prevention Measures) would avoid significant wildfire risks associated with construction of the proposed Master Plan along the northern and northwestern edges of the built portion of the main campus located in the VHFHSZ through the development and implementation of a construction fire protection plan (CFPP) and through the implementation of construction fire prevention measures. With the implementation of MM-HAZ-2 and MM-HAZ-3, the construction impact of the proposed Master Plan related to wildfire risks would be reduced to **less than significant**. (See Section 4.10.5, Mitigation Measures, for the full text of these mitigation measures.)

Operation

Consistent with the current layout of the campus, most development and concentration of student activity occurs within the campus core area. As indicated previously, no construction is proposed in the Agricultural Field Laboratory in the HFHSZ. Given that the northern and northwestern portions of the main campus are located in a VHFHSZ (see Figure 4.10-1) and adjacent to nearby naturally vegetated areas, development under the proposed Master Plan would be required to comply with the ignition-resistant construction standards of Chapter 7A of the CBC and CFC requirements for structural hardening (e.g., Class A roof systems). Structural hardening requirements address roofs, eaves, exterior walls, vents, appendages, windows, and doors and result in hardened structures that have been proven to perform at high levels (resist ignition) during the typically short duration of exposure to burning vegetation from wildfires. There are two primary concerns for structure ignition: 1) radiant and/or convective heat and 2) burning embers (NFPA 1144 2008, IBHS 2008). Burning embers have been a focus of building code updates for at least the last decade, and structures built to these codes have proven to be very ignition resistant. Likewise,

radiant and convective heat impacts on structures have been minimized through the exterior fire ratings for walls, windows and doors. Additionally, provisions for defensible space (described below) separating wildland fuels from structures and requirements for interior sprinklers have proven to reduce the number of structure losses in WUI areas. Newly constructed buildings, renovated buildings, and landscaping on or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land covered in flammable materials would be required to be consistent with state level 100-foot defensible space standards (California Public Resources Code Section 4291), or if such a distance cannot be met, such development would be required to meet CCR Title 14 requirements that have similar practical effects to the 100-foot defensible space standard (e.g., non-combustible block walls, hardscaping). Therefore, with the adherence to the CBC and CFC, the impacts of the proposed Master Plan related to wildfire risks would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Construction

The risk of potential ignitions resulting from near-term project construction activities would be considered very low for the vast majority of these near-term project sites given their non-combustible land cover. This is because most near-term project construction would occur within the interior of the campus core and paved areas. Near-term project construction activity along the northern and northwestern edges of the built portion of the main campus in the VHFHSZ (including Buildings 1, 5, 7, 8, 9, 13/13A, 14, 17, 76, 76A, 77, 78, 98, 144, as shown in Chapter 3, Project Description, Figure 3-5) could be subject to increased ignition potential resulting from construction equipment due to the proximity of native vegetation communities. In particular, the Lower Reservoir Tank Replacement (Building 144) would be located outside of the developed portion of the main campus within the Voorhis Ecological Reserve and is surrounded by native vegetation. The construction impacts of the above near-term projects along the northern and northwestern edges of the built portion of the main campus related to wildfire risks would be **potentially significant.**

Implementation of MM-HAZ-2 (Construction Fire Prevention Plan) and MM-HAZ-3 (Construction Fire Prevention Measures) would avoid significant wildfire risks associated with construction of the near-term projects along the northern and northwestern edges of the built portion of the main campus located in the VHFHSZ through the development and implementation of a construction fire protection plan (CFPP) and through the implementation of construction fire prevention measures. With the implementation of MM-HAZ-2 and MM-HAZ-3, the construction impact of the near-term projects related to wildfire risks would be reduced to **less than significant**. (See Section 4.10.5, Mitigation Measures, for the full text of these mitigation measures.)

Operation

Consistent with the current layout of the campus, most development and concentration of student activity occurs within the campus core area. Given that the northern and northwestern portions of the main campus are located in a VHFHSZ (see Figure 4.10-1) and adjacent to nearby naturally vegetated areas, the near-term projects would be required to comply with the ignition-resistant construction standards of Chapter 7A of the CBC and CFC requirements for structural hardening (e.g., Class A roof systems). Following construction, the near-term projects would be maintained according to these fire protection standards to reduce the risk of fire ignition and/or spread. Newly constructed buildings, renovated buildings, and landscaping would be required to be consistent with state level 100-foot defensible space standards (California Public Resources Code Section 4291), or if such a distance cannot be met, such development would be required to meet CCR Title 14 requirements that have similar practical effects to the 100-foot defensible space standard (e.g., non-combustible block walls, hardscaping). With the adherence to the CBC and CFC, the impacts of the near-term projects related to wildfire risks would be **less than significant**.

Impact 4.10-7 The project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. (Less than Significant)

Program-Level Analysis for Master Plan and Project-Level Analysis for Near-Term Projects

As described in Impact 4.10-7, Cal Poly Pomona would maintain defensible space around proposed Master Plan structures consistent with California Public Resources Code 4291, given its partial location within a VHFHSZ, or if such a distance cannot be met, such development would be required to meet CCR Title 14 requirements that have similar practical effects to the defensible space standard above (e.g., non-combustible block walls, hardscaping). The proposed Master Plan and near-term projects would also comply with all applicable CBC and CFC requirements for development in a VHFHSZ, including, but not limited to, specific requirements for structural hardening, water supply and flow, hydrant and standpipe spacing, signage, and fire department access. Proposed Master Plan roadway improvements would facilitate site access by responding fire agency personnel and project maintenance staff. None of the proposed Master Plan components, including near-term projects, are expected to exacerbate wildfire risk or result in additional temporary or permanent impacts beyond those identified in this EIR. For these reasons, impacts to the environment resulting from installation and maintenance of infrastructure would be **less than significant.**

Impact 4.10-8 The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. (Less than Significant)

Program-Level Analysis for the Master Plan

Wildfires can greatly reduce the amount of vegetation from hillsides. Plant roots stabilize the soil and above-ground plant structures slow water, allowing it to percolate into the soil. Removal of surface vegetation resulting from a wildfire reduces the ability of the soil surface to absorb rainwater and can allow for increased runoff that may include large amounts of debris. If hydrophobic conditions exist post-fire, the rate of surface water runoff is increased as water percolation into the soil is reduced (Moench and Fusaro 2012). The potential for surface runoff and debris flows therefore increases significantly for areas recently burned by large wildfires (Moench and Fusaro 2012).

Slope failures, mudflows, and landslides are common in areas where steep hillsides and embankments are present and such conditions would be exacerbated in a post-fire environment where vegetative cover has been removed. The proposed Master Plan area is occupied with steep slopes and hillsides, and is therefore potentially at risk of slope failures, mudflows, or landslides. However, as described in Section 4.8, Geology and Paleontology, compliance with the CBC and Special Publication 117A (i.e., Seismic Hazard Zonation Program), including completion of a final design level geotechnical report, would minimize the potential for slope instability to occur. The required site-specific geotechnical report, which would include, as appropriate, a slope stability analysis and provide remedial measures to address any potential slope instability would be incorporated into site designs. As a result, implementation of the proposed Master Plan would not directly or indirectly cause potential substantial adverse effects, associated with slope failure, mudflow, or landslides.

Increases in surface runoff and erosion are also possible in a post-fire environment where surface vegetation has been removed, and steep slopes can increase runoff flow velocity. As presented in Section 4.11, Hydrology and Water Quality, all development and redevelopment that introduces new impervious surfaces or replaces existing

impervious surfaces would be required to include stormwater control features to reduce the potential for increased runoff and associated erosion. Finally, the irrigated and maintained landscaping in Voorhis Ecological Reserve and the Agricultural Field Laboratories are not expected to be burned (removed) entirely should a fire occur on the proposed Master Plan area, unlike post-fire conditions in native vegetation where complete removal is common. Considering these proposed Master Plan area features and characteristics, post-fire conditions are not expected to increase risks associated with runoff and erosion. Potential impacts associated with runoff, post-fire slope instability, or drainage changes due to the proposed Master Plan would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Slope failures, mudflows, and landslides are common in areas where steep hillsides and embankments are present and such conditions would be exacerbated in a post-fire environment where vegetative cover has been removed. Some of the near-term project sites are occupied with steep slopes and hillsides, and are therefore potentially at risk of slope failures, mudflows, or landslides. However, as described in Section 4.8, Geology and Paleontology, compliance with the CBC and Special Publication 117A (i.e., Seismic Hazard Zonation Program), including completion of a final design level geotechnical report, would minimize the potential for slope instability to occur. The required site-specific geotechnical report, which would include, as appropriate, a slope stability analysis and provide remedial measures to address any potential slope instability would be incorporated into site designs. As a result, implementation of the near-term projects would not directly or indirectly cause potential substantial adverse effects, associated with slope failure, mudflow, or landslides.

Increases in surface runoff and erosion are also possible in a post-fire environment where surface vegetation has been removed, and steep slopes can increase runoff flow velocity. As presented in Section 4.11, Hydrology and Water Quality, all near-term project development and redevelopment that introduces new impervious surfaces or replaces existing impervious surfaces would be required to include stormwater control features to reduce the potential for increased runoff and associated erosion. Finally, the irrigated and maintained landscaping in Voorhis Ecological Reserve and the Agricultural Field Laboratories are not expected to be burned (removed) entirely should a fire occur on the near-term project sites, unlike post-fire conditions in native vegetation where complete removal is common. Considering these near-term project site features and characteristics, post-fire conditions are not expected to increase risks associated with runoff and erosion. Therefore, potential impacts associated with runoff, post-fire slope instability, or drainage changes due to the near-term projects would be **less than significant**.

4.10.4.2 Cumulative Impacts

Impact 4.10-9 **The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to hazards and hazardous materials. (Less than Significant)**

Hazards and Hazardous Materials

Impacts associated with hazardous materials, including environmental contamination and releases, are generally localized and specific to the project site in question. Secondly, site redevelopment often results in a reduction of environmental contamination, if such exists, through soil removal and excavation activities and abatement of hazardous building materials. Through regulatory requirements and mitigation, where warranted, for each specific project, impacts are ultimately reduced and not cumulative. Environmental regulations in place to protect site-specific workers and occupants are also protective of nearby occupants and receptors, such as spill control requirements and hazardous material management regulations.

Development and redevelopment activities have the potential to use hazardous materials or expose workers and the public to preexisting contamination. However, these cumulative projects would be fully regulated in compliance with local, state, and federal requirements, thus reducing potential for public safety risks, cumulative impacts associated with exposure to hazards and hazardous materials would be less than significant. Additionally, through mitigation (MM-HAZ-1) and compliance with regulatory requirements, as described in Impacts 4.10-1 through Impacts 4.10-5, the construction or operation of the proposed Master Plan itself would reduce the potential to combine with other cumulative impacts and therefore would not create a significant and cumulatively considerable environmental health or safety risks impact. For these reasons, the cumulative impact of the proposed Master Plan related to hazards and hazardous materials would be **less than significant**.

Wildfire

As described above, portions of the proposed Master Plan area would be located in a VHFHSZ. The proposed Master Plan, combined with other projects in the region, would increase the population and/or activities and ignition sources in the area, which may increase the chances of a wildfire and increase the number of people and structures exposed to risk of loss, injury, or death. As indicated in Impacts 4.10-6 through 4.10-8, all proposed Master Plan impacts would be less than significant with compliance with the CBC and CFC provisions and implementation of mitigation measures (MM-HAZ-2 and MM-HAZ-3), where warranted.

Cumulative projects are also required to comply with the CBC and CFC and applicable local building codes, which have been increasingly strengthened as a result of severe wildfires in Southern California. The fire and building codes include fire prevention and protection features that reduce the likelihood of a fire igniting on a specific project site and spreading to off-site vegetated areas. These codes also protect projects from wildfires that may occasionally occur in the area through implementation of brush management/fuel management zones. The fire and building codes are intended to offset the potential impacts so that fire service can be provided, and people and structures are not exposed to significant risk of loss, injury, or death involving wildland fires.

Furthermore, other cumulative projects would be required to comply with any local vegetation clearance requirements, to reduce the fuel load on vacant and developed properties. The fire and building codes, along with project-specific needs assessments, ensure that every project approved for construction includes adequate emergency access. Roads are required to meet widths, have all-weather surface, and be capable of supporting the imposed loads of responding emergency apparatus. Therefore, cumulative impacts related to wildfire hazards and emergency response and access would be **less than significant.**

4.10.5 Mitigation Measures

MM-HAZ-1 Underground Storage Tank (UST) Inventory and Soil Management Plan (SMP). Prior to any demolition or construction activities, the location of all potentially affected current and former USTs shall be determined and mapped, including the former leaking underground storage tank (LUST) site. The locations and status of all current and former USTs will be documented on a UST inventory. The inventory shall be consulted for all projects proposed as part of the Master Plan.

For projects that will result in demolition, construction, or earth moving activities within proximity of a current or former UST such that the UST or appurtenances may be damaged, changed, or otherwise impacted, the demolition, renovation, or construction plans will include protective measures to ensure USTs, piping, fill ports, or other associated features will not be damaged. Any changes to the UST or associated features will be completed in accordance with state and local

rules and regulations, and permits will be acquired in accordance with Los Angeles County Fire Department, as they regulate USTs under state regulations.

For projects that will result in demolition, construction, or earth moving activities within proximity of a current or former UST, a soil management plan (SMP) will be prepared that outlines actions and responses should contaminated soils be identified. Should soil contamination or previously undocumented USTs be identified during construction activities associated with other projects, earth moving activities will pause until a SMP can be developed. The SMP shall be prepared by a qualified environmental consultant that outlines the proper screening, handling, characterization, transportation, and disposal procedures for contaminated soils, should they be encountered in construction near UST sites. The SMP shall include health and safety and training procedures for workers who may come in contact with contaminated soils. The SMP shall also include procedures for the identification and proper abandonment of underground storage tanks, should any be identified during demolition and construction activities that were previously not identified in the UST inventory. The SMP shall include all applicable federal, state, and local regulations associated with handling, excavating, and disposing of contaminated soils; procedures for getting authorization for disposal of contaminated soils; and appropriate procedures, notifications, permitting requirements, handling, and disposal requirements for decommissioning any USTs. The SMP shall be implemented by Cal Poly Pomona or their designated contractor for all construction, demolition, or renovation activities that involve earthwork that may occur near a current or former UST.

MM-HAZ-2 Construction Fire Prevention Plan. Prior to the commencement of construction activities, Cal Poly Pomona shall prepare a construction fire protection plan (CFPP) that shall apply to the northern and northwestern portions of the main campus, located in the Very High Fire Hazard Severity Zone. The CFPP shall require the training of construction personnel and details related to fire-suppression procedures and equipment to be used on site during construction. Cal Poly Pomona shall include the CFPP in construction specifications and contracts for projects in the specified locations. The CFPP shall be consistent with the requirements in California Building Code Chapter 33 and California Fire Code Chapter 33, and shall include the following:

- Protocols for conducting mandatory project-specific environmental awareness training for all on-site construction workers, including the requirement to conduct the training prior to any grubbing or ground disturbance, and requirements for ongoing training to occur prior to commencement of each phase of construction.
- Requirements to conduct and document construction worker trainings, which shall include protocols for minimizing potential ignition activities, vegetation clearing, parking requirements/restrictions, equipment/vehicle idling restrictions, smoking restrictions, initial attack firefighting, proper use of gas-powered equipment and storage of flammable fuels, use of spark arrestors, fire reporting, and hot work restrictions.
- Identification of construction work restrictions during red flag warnings and high to extreme fire danger days.
- Specifications for access to adequate water supplies and/or water trucks to service construction activities.
- Documentation of emergency contact information and protocols for on-site emergency response communication to on-site workers, coordination with Los Angeles County Fire

Department and other local agencies, and reporting/documentation procedures for actions taken.

- Designation of an on-site fire awareness coordinator with an itemized description of their role and responsibility for ensuring compliance with the construction FPP, including demonstration of compliance with applicable plans and policies established by state and local agencies and documentation of completion of required construction worker trainings.

MM-HAZ-3 Construction Fire Prevention Measures. Prior to the execution of any contract with a construction contractor and prior to the onset of grading, Cal Poly Pomona shall ensure that the following requirements are included in the construction contractor's contract specifications:

- All required fuel modification for each phase of construction activity shall be implemented prior to commencement of that phase and prior to combustible building materials being delivered to the site.
- Prior to bringing lumber onto a project site, improvements within proximity to the active development area shall be in place, including temporary or permanent utilities, operable fire hydrants, an approved, temporary roadway surface, and fuel modification established pursuant to California Public Resources Code Section 4291.
- All temporary construction power lines shall only be allowed in areas that have been cleared of combustible vegetation.

4.10.6 Level of Significance After Mitigation

Implementation of MM-HAZ-1 through MM-HAZ-3 would reduce all potentially significant impacts of the proposed Master Plan, including near-term projects, to **less than significant**.

4.10.7 References

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4.11 Hydrology and Water Quality

The following analysis identifies potential impacts to hydrology and water quality resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing hydrology and water quality conditions in the proposed Master Plan area and its vicinity, identifies associated regulatory requirements, evaluates potential impacts, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts. Information about water supply, as it relates to hydrology and water quality is provided in the water supply evaluation prepared for the proposed Master Plan (see Appendix G).

One comment related to hydrology and water quality was received during the public scoping period in response to the Notice of Preparation (NOP). The comment, related to construction and operational stormwater management, was received from the Metropolitan Water District of Southern California (Metropolitan). The NOP and comments received in response are provided in Appendix A.

4.11.1 Environmental Setting

4.11.1.1 Regional Watershed

The Cal Poly Pomona campus (campus) is located within the San Gabriel River Watershed. The watershed drains into the San Gabriel River from the San Gabriel Mountains flowing 58 miles south until its confluence with the Pacific Ocean. Major tributaries to the San Gabriel River include Walnut Creek, San Jose Creek, Coyote Creek, and numerous storm drains entering from the 19 cities that the San Gabriel River passes through. Channel flows pass through different sections in the San Gabriel River, diverting from the riverbed into four different spreading grounds, held behind several rubber dams for controlled flow and groundwater recharge, and controlled through 10 miles of concrete channel bottom from below Whittier Narrows Dam to past Coyote Creek (LA County 2024). The watershed covers 640 square miles and comprises 26% residential, 15% commercial, 50% rural, and 9% other land uses (LA County 2024).

4.11.1.2 Climate

The climate of Pomona is characterized by a Mediterranean climate with warm, dry summers and mild, wet winters. The average rainfall from 1893 to 2016 has been approximately 17 inches per year, most of which falls between October and March (WRCC 2024). The average annual maximum temperature for the area is approximately 78° Fahrenheit (°F), with annual lows averaging approximately 47°F (WRCC 2024). Global climate change is expected to cause a future warming trend in Southern California even under moderate emissions scenarios; however, there is no clear trend in annual precipitation.

4.11.1.3 Local Watershed

The nearest surface water to the campus is the San Jose Creek, which is a tributary to San Gabriel River in what is referred to as the Upper San Gabriel River Watershed (Figure 4.11-1 Surface Waters). The campus itself is located within the Upper San Jose Creek watershed (EPA 2024). San Jose Creek flows generally from east to west and joins San Gabriel River upstream of the Whittier Narrows Dam. San Jose Creek is an intermittent stream that begins approximately 3.5 miles northeast of the campus near the Los Angeles County Fairplex where is joins with Thompson Wash. From Thompson Wash, San Jose Creek flows nearly 20 miles westwards through the Pomona

Valley and San Gabriel Valley. San Jose Creek has been subdivided into reaches with Reach 1 constituting the portion of the creek from its confluence with San Gabriel River up to West Temple Avenue and Reach 2 from West Temple to I-10 at White venue (EPA 2024). There is also a south fork of San Jose Creek, South San Jose Creek that join together approximately a mile southwest of the campus.

4.11.1.4 Topography and Drainage

The Cal Poly Pomona campus is located on a gently sloping alluvial fan, which originates at the mouth of the San Antonio Canyon and slopes gradually to the south and southwest. The topography within the campus ranges from approximately 1,000 feet above mean sea level within the agricultural hills northwest of Temple Avenue and north of University Drive, dropping to approximately 725 feet above mean sea level in the flattest portion of the campus along the eastern edge of the campus near Valley Boulevard and the agricultural fields south of Kellogg Drive (CSU 2012). Within the campus, slopes range from minimal (3%) in the east, gradually getting steeper to the west, where slopes range from 20% to greater than 30% in some areas. Over 30% of the campus contains slopes greater than 30% (CSU 2012).

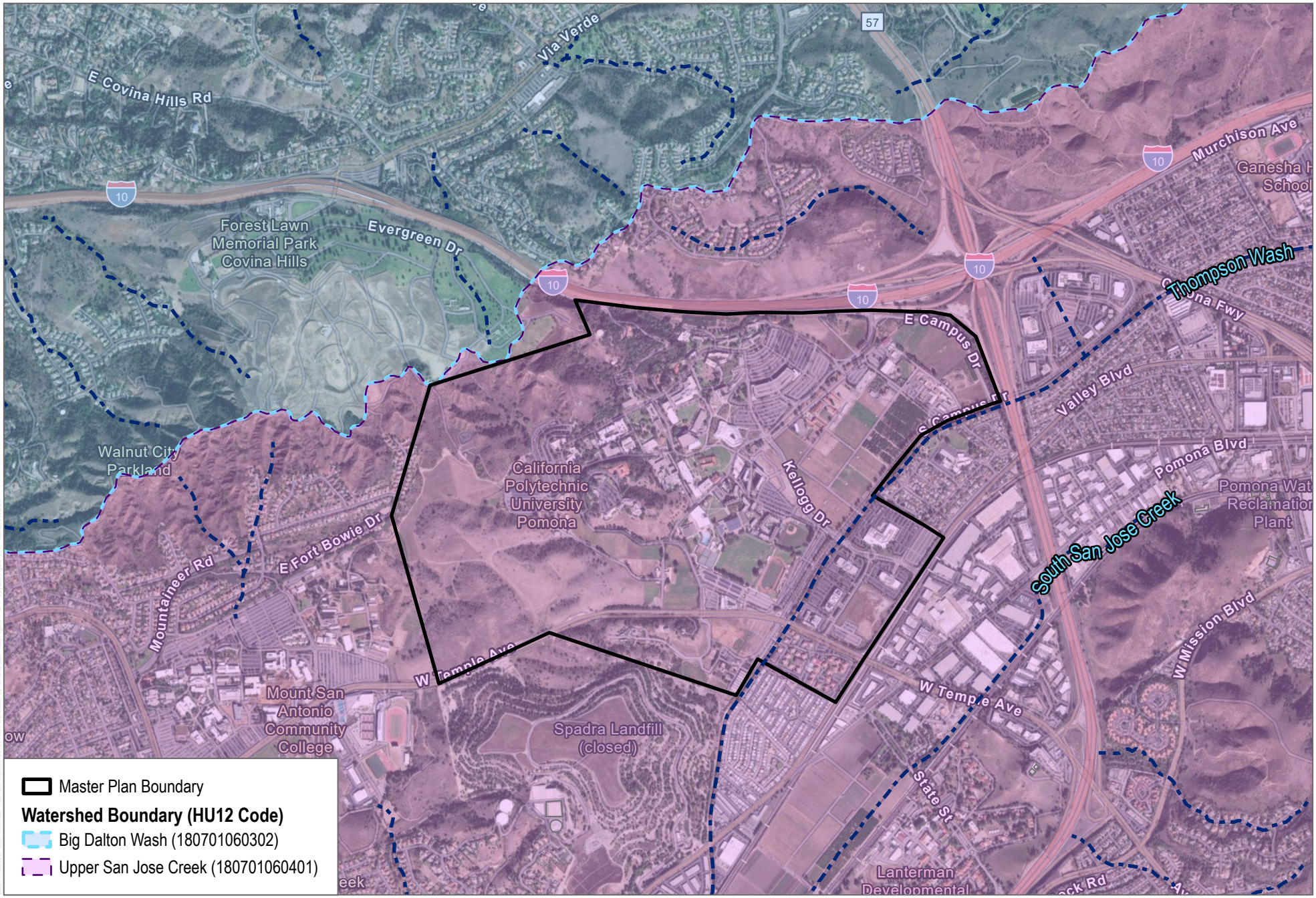
The on-campus drainage system is a gravity flow system that generally flows in a southeastern direction. The hills located in the western and northwestern areas of campus are generally undeveloped and provide for a source of natural percolation. Any excess water that drains from these hillsides during weather events flows in a southwesterly direction until it enters the existing campus stormwater system. The campus stormwater system conveys the water across the developed portion of the central campus before the water is ultimately discharged through a concrete drainage wash. The drainage wash runs along the south side of South Campus Drive and is part of the overall Los Angeles County Regional drainage system that eventually discharges to the Pacific Ocean. There are portions of the campus that have a small, isolated drainage system. The Center for Regenerative Studies (Building 209) and the W.K. Kellogg Arabian Horse Center are examples of these isolated systems. The Center for Regenerative Studies has a small-diameter drainage system that drains to ponds located around the facility. The W.K. Kellogg Arabian Horse Center has a small-diameter system that appears to daylight to the fields directly south and the drainage water is allowed to flow over the fields.

4.11.1.5 Flood Hazards

The Pomona area lies at the edge of the San Antonio Canyon floodplain. The City of Pomona is served by a system of local storm drains and several large flood control channels that convey stormwater away from the City of Pomona to the southwest. Major flood control facilities serving the area affected by runoff from the Cal Poly Pomona campus include the following:

- South San Jose Creek, located near the southern boundary of campus
- San Jose Creek (sometimes referred to as Thompson Wash), which runs north–south near South Campus Drive through campus, then trends westerly and becomes North San Jose Creek, which eventually drains to the Whittier Narrows.

The Cal Poly Pomona campus is located within Zone X, defined as an area of minimal flood hazard, and is not located within a 100-year floodplain, as defined by the Federal Emergency Management Agency (FEMA 2008).



SOURCE: World Imagery; USGS 2024

DUDEK

0 500 1,000 Feet

FIGURE 4.11-1

Surface Waters

Cal Poly Pomona Campus Master Plan EIR

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4.11.1.6 Surface Water Quality

Runoff conveyed and discharged by municipal stormwater systems has been identified by local, regional, and national research programs as one of the principal causes of water quality problems in urban areas, such as where the campus is located. This runoff potentially contains a host of pollutants including trash, debris, bacteria, viruses, oil, grease, sediments, nutrients, metals, and toxic chemicals. These contaminants can adversely affect the beneficial uses of receiving creeks, coastal waters, associated wildlife habitat, and public health. Urban runoff pollution is a problem during rainy seasons and throughout the year due to urban water uses that discharge non-stormwater runoff through dry-weather flows to the stormwater conveyance system.

Land development and construction activities introduce the following water quality concerns:

- Contribution of pollutants to receiving waters based on the creation of new impervious surfaces and potential new sources of pollutants (e.g., parking lots and petroleum fuels/oils/lubricants)
- Contribution of pollutants to receiving waters based on the removal or change of vegetation during construction
- Contribution of pollutant-based sediment transport caused by increased impervious cover and the resultant increased erosive force
- Significant alteration of drainage patterns

When areas are developed, new impervious areas are also created (e.g., roads, parking lots, structures). Because the natural landscape's ability to infiltrate and cleanse urban runoff is "capped" by the impervious surfaces, rainfall that would have normally percolated into the soil is instead converted to runoff that flows directly to downstream creeks, bays, and beaches. This phenomenon is especially pronounced during high-intensity rainfall events.

The Clean Water Act, Section 303(d), requires states to develop a list of waters that do not meet water quality standards (see Section 4.11.2, Regulatory Setting, for additional information about this regulatory requirement). These waters are called "water quality limited segments." Reach 1 of San Jose Creek is identified as impaired with identified issues of acidity, bacterial and other microbes, chlorine, and salts (EPA 2024). Reach 2 is identified as impaired by bacteria and other microbes (EPA 2024). South San Jose Creek is listed as being of good water quality condition (EPA 2024).

4.11.1.7 Groundwater

A groundwater basin is a hydrogeologic unit containing one large aquifer and several connected and interrelated aquifers. The campus is located within the San Gabriel Valley Groundwater Basin (No. 4-013) (Basin). The Basin is located in eastern Los Angeles County and includes the water-bearing sediments underlying most of the San Gabriel Valley. The Basin is bounded on the north by the Raymond fault and the contact between Quaternary sediments and consolidated basement rocks of the San Gabriel Mountains. Exposed consolidated rocks of the Repetto, Merced, and Puente Hills bound the Basin on the south and west, and the Chino fault and the San Jose fault form the eastern boundary (DWR 2004). Pursuant to the Sustainable Groundwater Management Act (SGMA), the San Gabriel Valley Groundwater Basin is considered a low-priority basin and not subject to the requirements of SGMA.

The San Gabriel Valley Groundwater Basin was adjudicated in 1973 and divided into six basin areas (subbasins) with a Watermaster appointed for each to manage the operating safe yield. Adjudicated basins are not subject to SGMA as their operating guidelines are court-ordered. The Spadra Subbasin, where Cal Poly Pomona wells draw their water, is a small, very-low-priority, non-adjudicated subbasin within the larger San Gabriel Valley Groundwater

Basin (Appendix G). However, even though not subject to SGMA, the Spadra Basin Groundwater Sustainability Agency (GSA) was formed in 2017 by the City of Pomona and the Walnut Valley Water District (WVWD) in order to better maintain the water supply (Appendix G). As a result, the GSA has voluntarily prepared a Groundwater Sustainability Plan (GSP) with the objectives of maximizing the beneficial use of the Spadra Basin while ensuring long-term sustainability (Spadra Basin GSA 2020). Except for the Spadra Basin, all aquifers in the San Gabriel Valley area are managed. The Rio Hondo and San Gabriel drainages have their headwaters in the San Gabriel Mountains, then surface water flows southwest across the San Gabriel Valley and exit through the Whittier Narrows, a gap between the Merced and Puente Hills. A natural underground water system, originating in the hills above the campus, flows under the campus, and then daylights at the ponds near the student residences and the Classroom/Lab/Administration Building (Building 98). Groundwater levels at the campus are estimated to be approximately 15 to 25 feet below ground surface (Geocon 2011).

The City of Pomona and Cal Poly Pomona utilize the Spadra Basin for domestic water supplies. The campus receives potable water from two sources: directly from Metropolitan and through two existing groundwater wells owned and operated by Cal Poly Pomona, although one of the wells has become inactive due to a high level of volatile organic compounds (Cal Poly Pomona 2023). In addition, Cal Poly Pomona has two other wells located on Spadra Farm which are used for farm irrigation and landscaping. Estimated groundwater pumping from the Spadra Basin has been historically an average of approximately 1,280 acre-feet per year (AFY) from the period of 1977 to 2018 (West Yost 2021). The conversion of agricultural land to urban uses and the lining of San Jose Creek have limited groundwater recharge in the Spadra Basin in the last several decades.

Based on previous water quality assessments in 2001, both groundwater wells are considered most vulnerable to the following activities: illegal and/or unauthorized dumping activities, historical and present applications of fertilizers, and animal grazing (Cal Poly Pomona 2023). Nitrate and perchlorate have been detected in the campus wells because of the potential activities identified. Therefore, the nitrate and perchlorate levels in the on-site groundwater wells are continuously tested and monitored. When the nitrate and perchlorate concentrations reach a certain level, the groundwater is treated through reverse osmosis as well as blended with water supplied by Metropolitan to keep the nitrate and perchlorate levels below the maximum contaminant level, a drinking water standard. Cal Poly Pomona is a state-certified water agency that is permitted to produce its own potable water. Since the 2001 assessments, Cal Poly Pomona has implemented countermeasures to decrease its vulnerability, including increasing security, limiting access, and replacing and upgrading water monitoring systems (Cal Poly Pomona 2023).

In addition, as discussed in more detail in Section 4.10 Hazards and Hazardous Materials, the main campus partially overlaps the Spadra Landfill property, although not the portion that was used for waste disposal. As part of the monitoring effort of that landfill, there are monitoring wells within the main campus boundary along the south side of West Temple Avenue. One of these wells had concentrations of chloroform that exceeded permitted concentration limits; however, it was concluded that the detections were not the result of a release from the landfill.

4.11.2 Regulatory Setting

4.11.2.1 Federal

Clean Water Act

The Clean Water Act (CWA), as amended by the Water Quality Act of 1987, is the major federal legislation governing water quality (33 USC 1251 et seq.). The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." The CWA establishes basic guidelines for regulating discharges of both point and nonpoint sources of pollutants into the waters of the United States. The CWA requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the CWA. Relevant sections of the CWA are as follows:

- Sections 303 and 304 provide for water quality standards, criteria, and guidelines. Under Section 303(d) of the CWA, the State of California is required to develop a list of impaired water bodies that do not meet water quality standards and objectives. California is required to establish total maximum daily loads (TMDLs) for each pollutant/stressor. A TMDL defines how much of a specific pollutant/stressor a given water body can tolerate and still meet relevant water quality standards. Once a water body is placed on the Section 303(d) List of Water Quality Limited Segments, it remains on the list until a TMDL is adopted and the water quality standards are attained, or there is sufficient data to demonstrate that water quality standards have been met, and delisting from the Section 303(d) list should take place.
- Section 401 requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the CWA. This process is known as the Water Quality Certification/Waste Discharge Requirements process.
- Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for the discharge of any pollutant (except for dredged or fill material) into waters of the United States. This permit program is administered by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs), which have several programs that implement individual and general permits related to construction activities, stormwater runoff quality, and various kinds of non-stormwater discharges.
- Section 404 establishes a permit program for the discharge of dredged or fill material into waters of the United States. This permit program, known as the Discharge of Dredged or Fill Material into waters of the United States, is jointly administered by the U.S. Army Corps of Engineers and the U.S. Environmental Protection Agency (EPA).

Numerous agencies have responsibilities for administration and enforcement of the CWA. At the federal level this includes the EPA, the U.S. Army Corps of Engineers, the Bureau of Reclamation, and the major federal land management agencies, such as the U.S. Forest Service and the Bureau of Land Management. At the state level, with the exception of tribal lands, the California Environmental Protection Agency and its subagencies, including the SWRCB, have been delegated primary responsibility for administering and enforcing the certain provisions of the CWA in California. At the local level, the Los Angeles RWQCB, municipalities, and special districts have implementation and enforcement responsibilities under the CWA.

In 1990, EPA promulgated rules establishing Phase I of the NPDES stormwater program. The Phase I program for Municipal Separate Storm Sewer Systems (MS4s) requires operators of "medium" and "large" MS4s, that is, those that generally serve populations of 100,000 or greater, to implement a stormwater management program as a means to control polluted discharges from these MS4s. The stormwater Phase II Rule extends coverage of the NPDES stormwater program to certain "small" MS4s but takes a slightly different approach to how the stormwater management program is developed and implemented. Cal Poly Pomona is regulated under the Phase II program. These regulations require Cal Poly Pomona to develop and implement a stormwater management plan (SWMP). See Section 4.11.2.2, State, below for information about Cal Poly Pomona's SWMP.

Polluted stormwater runoff is often transported to MS4s and ultimately discharged into local waterways (rivers, streams, lakes, and bays) without treatment. EPA's stormwater Phase II Rule establishes an MS4 stormwater management program that is intended to improve the nation's waterways by reducing the quantity of pollutants that stormwater picks up and carries into storm sewer systems during storm events. Common pollutants include oil and grease from roadways and parking lots, pesticides from lawns, sediment from construction sites, and carelessly discarded trash, such as cigarette butts, paper wrappers and plastic bottles. These pollutants are deposited into nearby waterways, discouraging recreational use of the resource, and interfering with the habitat for fish, other aquatic organisms, and wildlife.

NPDES Phase II regulations require operators of small MS4s to develop a program in order to:

- Reduce the discharge of pollutants to the "maximum extent practicable" (MEP)
- Protect water quality
- Satisfy the appropriate water quality requirements of the CWA and Regional Water Quality Control Board Basin Plan

Safe Drinking Water Act

The Federal Safe Drinking Water Act was established in 1974 and sets drinking water standards throughout the country; it is administered by EPA. The drinking water standards established in the act, as set forth in the Code of Federal Regulations (CFR), are referred to as the National Primary Drinking Water Regulations (40 CFR 141, Primary Standards), and the National Secondary Drinking Water Regulations (40 CFR 143, Secondary Standards). According to the EPA, the Primary Standards are legally enforceable standards that apply to public water systems. The Secondary Standards are non-enforceable guidelines regulating contaminants that may cause cosmetic or aesthetic effects in drinking water. The EPA recommends the Secondary Standards for water systems but does not require systems to comply. California passed its own Safe Drinking Water Act in 1986 that authorizes the state's Department of Health Services to protect the public from contaminants in drinking water by establishing maximum contaminants levels (as set forth in the California Code of Regulations (CCR), Title 22, Division 4, Chapter 15) that are at least as stringent as those developed by the EPA, as required by the Federal Safe Drinking Water Act.

Federal Antidegradation Policy

The federal Antidegradation Policy (40 CFR 131.12) is designed to protect water quality and water resources. The policy requires states to develop statewide antidegradation policies and identify methods for implementing those policies. State antidegradation policies and implementation measures must include the following provisions: (1) existing instream uses and the water quality necessary to protect those uses shall be maintained and protected; (2) where existing water quality is better than necessary to support fishing and swimming conditions, that quality

shall be maintained and protected unless the state finds that allowing lower water quality is necessary for important local economic or social development; and (3) where high-quality waters constitute an outstanding national resource, such as waters of national and state parks, wildlife refuges, and waters of exceptional recreational or ecological significance, that water quality shall be maintained and protected. State permitting actions must be consistent with the federal Antidegradation Policy.

California Toxics Rule

The California Toxics Rule (CTR) is a federal regulation issued by the EPA providing water quality criteria for potentially toxic constituents in receiving waters with human health or aquatic life designated uses in the State of California (EPA 2000). The EPA adopted the CTR in 2000 to create legally applicable water quality criteria for priority toxic pollutants for inland surface waters, enclosed bays, and estuaries to protect human health and the environment for all purposes and programs under the CWA. The CTR aquatic life criteria were derived using a CWA Section 304(a) method that produces an estimate of the highest concentration of a substance in water, which does not present a significant risk to the aquatic organisms in the water and their uses (EPA 2000). The CTR water quality criteria provide a reasonable and adequate amount of protection with only a small possibility of substantial overprotection or under protection.

The CTR's numerical aquatic life criteria are expressed as short-term (acute) and long-term (chronic) averages, rather than one number, in order that the criteria more accurately reflect toxicological and practical realities (EPA 2000). Due to the intermittent nature of stormwater runoff, especially in Southern California, the acute criteria are considered to be more applicable to stormwater conditions than chronic criteria and therefore are used in assessing project impacts. Acute criteria represent the highest concentration of a pollutant to which aquatic life can be exposed for a short period of time (1 hour) without deleterious effects; chronic criteria equal the highest concentration to which aquatic life can be exposed for an extended period of time (4 days) without deleterious effects.

4.11.2.2 State

Porter–Cologne Water Quality Control Act

The Porter–Cologne Water Quality Control Act (codified in the California Water Code, Section 13000 et seq.) is the primary water quality control law for California. Whereas the CWA applies to all waters of the United States, the Porter–Cologne Act applies to waters of the state,[1] which includes isolated wetlands and groundwater in addition to federal waters. The Porter–Cologne Act grants the SWRCB and the nine RWQCBs power to protect water quality and is the primary vehicle for implementation of California's responsibilities under the federal CWA and also responsibility to adopt plans and policies, to regulate discharges of waste to surface and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. Further, the Porter–Cologne Act establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil or petroleum product.

The act requires a "Report of Waste Discharge" for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair a beneficial use of surface or groundwater of the state. California Water Code Section 13260 subdivision (a) requires that any person discharging waste or proposing to discharge waste that

[1] "Waters of the state" are defined in the Porter–Cologne Act as "any surface water or groundwater, including saline waters, within the boundaries of the state" (California Water Code, Section 13050(e)).

could affect the quality of the waters of the state (other than to a community sewer system) to file a Report of Waste Discharge with the applicable RWQCB. For discharges directly to surface water (waters of the United States), an NPDES permit is required, which is issued under both state and federal law; for other types of discharges, such as waste discharges to land (e.g., spoils/soils disposal and storage), erosion from soil disturbance, or discharges to waters of the state (such as groundwater and isolated wetlands), Waste Discharge Requirements (WDRs) are required and are issued exclusively under state law. WDRs typically require many of the same best management practices (BMPs) and pollution control technologies as required by NPDES-derived permits.

NPDES Construction General Permit

For stormwater discharges associated with construction activity in the State of California, the SWRCB has adopted the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit [CGP]) (Order No. 2022-0057-DWQ, effective September 1, 2023) to avoid and minimize water quality impacts attributable to such activities. The CGP applies to all projects in which construction activity disturbs 1 acre or more of soil. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling and excavation. The CGP requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which would specify water quality BMPs designed to reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the construction site. Routine inspection of all BMPs is required under the provisions of the CGP, and the SWPPP must be prepared and implemented by qualified individuals as defined by the SWRCB.

To receive coverage under the CGP, a project applicant must submit a Notice of Intent and permit registration documents to the SWRCB. Permit registration documents include completing a construction site risk assessment to determine appropriate coverage level; detailed site maps showing disturbance area, drainage area, and BMP types/locations; the SWPPP; and where applicable, post-construction water balance calculations and active treatment systems design documentation. The projects implemented under the proposed Master Plan would be required to obtain a CGP and prepare a SWPPP.

California Antidegradation Policy

The California Antidegradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High Quality Water in California, was adopted by the SWRCB (State Board Resolution No. 68-16) in 1968. Unlike the federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the state, not just surface waters. The policy requires that, with limited exceptions, whenever the existing quality of a water body is better than the quality established in individual Basin Plans (see description below), such high quality must be maintained, and discharges to that water body must not unreasonably affect any present or anticipated beneficial use of the water resource.

Water Quality Control Plan (Basin Plan) for the Los Angeles Region

The California State Legislature has assigned the primary responsibility to administer and enforce statutes for the protection and enhancement of water quality, including the Porter–Cologne Act and portions of the CWA, to the SWRCB and its nine RWQCBs. The Los Angeles RWQCB implements the Water Quality Control Plan for the Los Angeles and Santa Monica Bay watersheds (Basin Plan), which designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan (California Water Code Sections 13240–13247). The Porter–Cologne Act also provides the RWQCBs with authority to include within their Basin Plan water discharge prohibitions applicable to

particular conditions, areas, or types of waste. The Basin Plan is continually updated to include amendments related to implementation of TMDLs, revisions of programs and policies within the Los Angeles RWQCB region, and changes to beneficial use designations and associated water quality objectives. The Basin Plan is the guiding document that establishes water quality standards for the region.

The Basin Plan for each region provides quantitative and narrative criteria for a range of water quality constituents applicable to certain receiving water bodies and groundwater basins within the Los Angeles region. Specific criteria are provided for the larger, designated water bodies within the region, as well as general criteria or guidelines for ocean waters, bays, and estuaries; inland surface waters; and groundwaters. In general, the narrative criteria require that degradation of water quality not occur due to increases in pollutant loads that will adversely impact the designated beneficial uses of a water body.

General Waste Discharge Requirements for Low Threat to Water Quality

The Los Angeles RWQCB issued the Statewide General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality Region (Order No. 2003-0003-DWQ). The General Order regulates discharges that include discharges associated with well development, monitoring well purge water, boring waste, water main, water storage tank, water hydrant flushing, pipelines/tank hydrostatic testing, swimming pool, small/temporary dewatering (e.g., construction dewatering), and other miscellaneous discharges. The Discharger must comply with this Order or any more stringent standards in the applicable Basin Plan. In the event of a conflict between the provisions of these General WDRs and the applicable Basin Plan, the more stringent provision prevails. Dischargers seeking coverage under these General WDRs must file with the appropriate Regional Board: (a) a Notice of Intent to comply with the terms and conditions of these General WDRs or a Report of Waste Discharge, (b) the applicable first annual fee as required by Title 23, CCR, Section 2200, (c) a project map, (d) evidence of California Environmental Quality Act (CEQA) compliance, and (e) a discharger monitoring plan. Upon review by Regional Board staff, a determination will be made as to whether or not coverage under these General WDRs is appropriate. The Discharger will be notified by a letter from the Regional Board Executive Officer when coverage under these General WDRs has begun. The discharge of waste causing the spread of groundwater contamination is prohibited.

Sustainable Groundwater Management Act

On September 16, 2014, Governor Jerry Brown signed into law a three-bill legislative package—Assembly Bill 1739 (Dickinson), Senate Bill 1168 (Pavley), and Senate Bill 1319 (Pavley)—collectively known as the Sustainable Groundwater Management Act (SGMA), which requires governments and water agencies of high- and medium-priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, sustainability should be achieved by 2040. For the remaining high- and medium-priority basins, 2042 is the deadline. Through SGMA, the California Department of Water Resources provides ongoing support to local agencies through guidance, financial assistance, and technical assistance. SGMA empowers local agencies to form Groundwater Sustainability Agencies to manage basins sustainably and requires those Groundwater Sustainability Agencies to adopt Groundwater Sustainability Plans for crucial (i.e., medium to high priority) groundwater basins in California.

Stormwater Management Plan

In accordance with the CWA and the Porter–Cologne Act, the SWRCB and the RWQCBs administer permit programs that group similar types of activities with similar threats to water quality. These “general permit” programs include

the Phase II Small MS4 Permit. The campus is covered by the SWRCB Phase II MS4 permit (WQ Order No. 2003-0005-DWQ). Besides requiring implementation of construction site BMPs and performance criteria and design guidelines for development within the small MS4s service area, the Small MS4 Permit also requires operators to map their outfalls, properly maintain the storm drain system, educate the public on pollution prevention, and monitor and report on the quality of MS4 discharges to receiving waters so that the effectiveness of the program can be evaluated. Collectively, the program elements are designed to ensure discharges from the storm drain system do not contain pollutant loads at levels that violate water quality standards and Basin Plan objectives and policies (such as a TMDL for a CWA Section 303(d) impaired water body). Implementation of the program elements includes the requirement that Cal Poly Pomona implement a SWMP to control stormwater runoff at the site and ensure that both stormwater quality and quantities are managed in accordance with the MS4 permit,

4.11.3 Thresholds of Significance and Methodology

4.11.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section15064.7). The significance criteria used to evaluate the proposed Master Plan impacts to hydrology and water quality are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to hydrology and water quality would occur if the proposed Master Plan would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    a. result in substantial erosion or siltation on or off site;
    b. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;
    c. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
    d. impede or redirect flood flows.
4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

4.11.3.2 Methodology

Both construction and operation of the proposed Master Plan are considered in the impact analysis. The impact analysis assumes that the proposed Master Plan would be constructed in compliance with a prepared SWPPP

regardless of whether individual development sites exceed 1 acre, because the proposed Master Plan would exceed 1 acre. The analysis assumes adherence to all applicable federal and state regulatory requirements including all drainage control requirements.

In addition, as stated in Chapter 3, Project Description, the following Project Design Features (PDFs) are included in the analytical assumptions for purposes of impact determinations (see Chapter 3, Project Description for the specific text of each applicable PDF). The PDFs will be incorporated into the Master Plan's Mitigation Monitoring and Reporting Program, which will be adopted by the CSU Board of Trustees when they consider approval of the proposed Master Plan:

- PDF-HWQ-1: Develop project-specific BMPs for all projects regardless of acreage.
- PDF-HWQ-2: Implement effective stormwater management practices.
- PDF-HWQ-3: Produce less runoff than pre-development conditions.
- PDF-MWD-1: Coordination with Metropolitan Water District.

4.11.4 Impact Analysis

4.11.4.1 Issues Not Further Evaluated

The proposed Master Plan would have no impact with respect to the following threshold of significance and therefore this topic is not further evaluated:

- Release of Pollutants due to Project Inundation. The campus is not located within a flood hazard area (FEMA 2008). The campus is also located approximately 28 miles inland such that it is outside of any tsunami hazard area. No enclosed or semi-enclosed bodies of water are located in the vicinity of the campus such that there is no risk of seiche-related hazards. In addition, as detailed in Section 4.10, Hazards and Hazardous Materials, all storage and handling of hazardous materials would occur in accordance with federal and state regulatory requirements that minimize risk of inadvertent release. Therefore, neither construction nor operation of the proposed Master Plan would risk the release of pollutants resulting from inundation. As such, no impacts related to pollutant release would occur.

4.11.4.2 Project Impacts

Impact 4.11-1 The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. (Less than Significant)

Program-Level Analysis for Master Plan

Construction activities under the proposed Master Plan, such as grading, excavation, and trenching, would result in disturbance of soils in the proposed Master Plan area. Construction site runoff can contain soil particles and sediments from these activities. Dust from construction sites, in addition to spills or leaks from heavy equipment and machinery, staging areas, or building sites, can also contribute runoff to adjacent water bodies. Typical pollutants could include petroleum products and heavy metals from equipment, as well as products such as paints, solvents, and cleaning agents, which could contain hazardous constituents. Sediment from erosion of graded or excavated surface materials, leaks or spills from equipment, or inadvertent releases of construction

materials could result in water quality degradation of receiving waters if not managed appropriately. As noted above, water quality of Reaches 1 and 2 of San Jose Creek are identified as impaired, so any introductions of the identified pollutants or new pollutants could exacerbate water quality impairments (EPA 2024).

The prevailing standard within the federal and state regulations is to reduce pollutant contributions to the maximum extent practicable regardless of how minor the sediment contribution might be. As discussed in Section 4.11.2, Regulatory Setting, for stormwater discharges associated with construction activity in the State of California, the NPDES CGP must be complied with in order to avoid and minimize water quality impacts attributable to such activities. The CGP applies to all projects in which construction activity disturbs 1 acre or more of soil.[2] Construction activity subject to this permit includes site clearing, grading, and disturbances to the ground, such as stockpiling and excavation. The CGP requires the development and implementation of a SWPPP, which would specify water quality BMPs designed to reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the construction site. Routine inspection of all BMPs is required under the provisions of the CGP, and the SWPPP must be prepared and implemented by qualified individuals, as defined by the SWRCB. Development under the proposed Master Plan would be required to obtain a CGP and prepare a SWPPP and follow required BMPs during construction.

Typical erosion and sediment control features that would be required as part of construction would include: gravel bag silt basins installed immediately upstream of storm drain inlets; silt and mud cleanup on adjacent streets and storm drain systems; silt and debris removal from lined and unlined ditches after each major rainfall event; inclusion of erosion control equipment and workers for emergency work, including stockpiling materials on site, to facilitate rapid construction of temporary devices when rain is imminent; and restoration of erosion/sediment control devices after each runoff producing rainfall. A copy of the applicable SWPPP would be kept at the construction site.

Non-stormwater discharges during construction would include periodic application of water for dust control purposes. Because dust control is necessary during windy and dry periods to prevent wind erosion and dust plumes, water would be applied in sufficient quantities to wet the soil but not so excessively as to produce runoff from the construction site. Water applied for dust control would either quickly evaporate or locally infiltrate into shallow surface soils. These requirements are routine in SWPPPs, which typically state that water would only be applied in a manner that does not generate runoff. Therefore, water applied for dust control would not result in appreciable effects on groundwater or surface water features and thus would not cause or contribute to exceedances of water quality objectives contained in the RWQCB Basin Plan.

If not properly designed and constructed, development and redevelopment under the proposed Master Plan could increase the rate of urban pollutant in off-site discharges. In accordance with the NPDES program requirements, in order to prevent adverse effects to water quality, all proposed Master Plan elements would be designed in compliance with: (1) PDF-HWQ-1 and PDF-HWQ-2 (see above); (2) Section 402(p) of the CWA, which generally mandates that MS4 discharges to surface waters be regulated by an NPDES permit; (3) NPDES Phase II MS4 permit, which regulates the issuance of waste discharge to Los Angeles County drainages and regulates stormwater discharges and non-stormwater discharges; and (4) the Cal Poly Pomona SWMP. In addition, PDF-HWQ-3 requires that post-development runoff, at a minimum, does not exceed pre-development conditions, which can also protect the water quality of receiving waters. As required, all elements of the proposed Master Plan would incorporate source-control BMPs designed to control stormwater runoff contamination. Although some infiltration through

[2] Under the CGP, projects cannot be piecemealed and as a result, because the campus is larger than 1 acre, all projects under the proposed Master Plan regardless of the individual footprint of the project would be subject to the CGP requirements.

landscaped and open space areas would occur, projects implemented by the proposed Master Plan would primarily rely on the implementation of treatment control BMPs to control stormwater runoff contamination.

Based on compliance with the CGP, PDFs, the NPDES Phase II MS4 permit, and the Cal Poly Pomona SWMP, proposed Master Plan construction and operational impacts related to water quality would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Proposed near-term projects under the proposed Master Plan could also potentially violate water quality standards, if not designed and managed appropriately. Near-term projects would be subject to the same drainage control requirements as described above for the proposed Master Plan. As a result, implementation of the PDFs combined with consistency with the NPDES Phase II MS4 permit, and the Cal Poly Pomona SWMP would ensure that potential water quality impacts from the near-term projects would be **less than significant**.

Impact 4.11-2 The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. (Less than Significant)

Program-Level Analysis for Master Plan

As described above, development and redevelopment associated with the proposed Master Plan could result in an increase in impervious areas, which could reduce potential groundwater recharge. However, the inclusion of PDF-HWQ-3 would ensure that runoff is equal to or less than pre-development conditions, which means use of post-construction BMPs that encourage on-site infiltration (e.g., bioretention basins and bioswales). As a result, there should be a negligible change to on-site groundwater recharge due to implementation of the proposed Master Plan.

The campus is located within the Spadra Basin, a non-adjudicated groundwater subbasin of the San Gabriel Valley Basin. According to the designations set by the California Department of Water Resources (DWR) for compliance with SGMA, the San Gabriel Valley Basin is a low-priority basin and not required to prepare or implement a GSP. However, the WVWD and the City of Pomona collectively formed a GSA for the Spadra Basin and voluntarily decided to prepare and adopt a GSP. The GSP will have a goal of attaining sustainability by 2040. The GSP is still being finalized, however the Draft GSP considers groundwater demands from the campus with projections out to 2070 and shows growth in water demands out to 2030 for Cal Poly Pomona (West Yost 2021).

According to the water supply evaluation prepared for the proposed Master Plan, it appears Cal Poly Pomona would be able to meet drinking water demands for the proposed increased headcount as a result of the proposed Master Plan increasing potable water capacity systems (Appendix G). These include the installation of a volatile organic compound wellhead treatment system at Well 02 to expand the availability of source groundwater for potable use and adding an additional reverse osmosis water treatment train to expand the system capacity. Cal Poly Pomona also proposes to continue to purchase water from Three Valleys Municipal Water District as an emergency backup to help meet its demand, under the proposed Master Plan.

Once the proposed Master Plan buildout is complete, the total demand for Cal Poly Pomona would be estimated to be 717 AFY. This estimate is 139 AFY less than the projected 856 AFY that the 2022 GSP anticipates Cal Poly Pomona would use (Appendix G). However, the Spadra Basin is currently in overdraft as of 2020 and will continue to be in overdraft if all three water purveyors (Cal Poly Pomona, WVWD, and the City of Pomona) pump water according to the GSP projections. By 2040, the annual developed yield is anticipated to increase due to a reduction of pumping from the City of Pomona and the potential for greater precipitation events. If Cal Poly Pomona, the City

of Pomona, and WVWD can manage their pumping from the Basin to be below projections, the Basin appears to be able to support their demands. As the Basin currently has no artificial recharge and relies only on deep percolation from precipitation, the groundwater levels must be monitored in order to ensure sustainability. The GSP outlines sustainability criteria for monitoring of groundwater levels and the water supply evaluation concludes that based on available information, it is likely the proposed Master Plan would have sufficient water available from the Basin during normal, single dry, and multiple dry years over a 20-year projection (Appendix G).

Therefore, the proposed Master Plan is already being considered for the Spadra Basin GSP, which includes an estimated demand that is higher than the proposed water demand, and as a result would not conflict with or obstruct implementation of a Groundwater Sustainability Plan. As a result, proposed Master Plan impacts would be **less than significant.**

Project-Level Analysis for Near-Term Projects

Proposed near-term projects under the proposed Master Plan could also potentially result in increases in impervious surfaces, which could reduce groundwater recharge. However, near-term projects would be subject to the same drainage control requirements, as described above for the proposed Master Plan, which would include design features that encourage on-site infiltration as required by PDF-HWQ-3. As with the proposed Master Plan, the near-term projects are considered part of the planning for the Spadra Basin GSP. As a result, the near-term projects would not conflict with or obstruct implementation of a GSP, and impacts would be **less than significant**.

Impact 4.11-3 **The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would (i) result in substantial erosion or siltation on or off site, (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site, or (iii) increase or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. (Less than Significant)**

Program-Level Analysis for Master Plan

Erosion and Siltation

There are no natural stream or river courses within the campus area that would be altered as a result of implementation of the proposed Master Plan. However, development and redevelopment could include earthwork activities and result in an alteration of drainage patterns that potentially expose soils to the effects of erosion or siltation. As described in Impact 4.11-1, all development and redevelopment that introduces new impervious surfaces or replaces existing impervious surfaces would be required to include stormwater control features to reduce the potential for increased runoff and associated erosive scour and siltation of on- or off-site receiving waters. These measures could include the use of retention, biofiltration, vegetation-based, and/or treatment-based stormwater quality measures that are consistent with Phase II MS4 permit requirements and the Cal Poly Pomona SWMP. Therefore, with compliance to existing regulatory requirements and inclusion of PDF-HWQ-1 and PDF-HWQ-2, the proposed Master Plan would not alter the existing drainage pattern of the proposed Master Plan area, resulting in substantial erosion or siltation, on or off site. Impacts would be **less than significant**.

Stormwater Drainage

Future development and redevelopment associated with the proposed Master Plan would be completed in accordance with Phase II MS4 and Cal Poly Pomona SWMP requirements, which would be expected to generate little or no increase in runoff to the existing stormwater drainage system. The inclusion of PDF-HWQ-3 would ensure that runoff is equal to or less than pre-development conditions. Proposed Master Plan related redevelopment could even potentially improve drainage conditions by decreasing off-site flow and reducing potential downstream flooding through adherence to the more current drainage control requirements and PDF-HWQ-3. Such improved drainage conditions would be considered a beneficial impact. Additionally, the campus is located outside of the 100-year flood zone (FEMA 2008) and therefore, development under the proposed Master Plan would not impede or redirect flood flows. Therefore, implementation of the proposed Master Plan would not alter the existing drainage pattern of the proposed Master Plan area or at the site of future redevelopment projects and would not exceed the capacity of existing or planned stormwater drainage systems, result in flooding on- or off site, impede or redirect flood flows, or provide substantial additional sources of polluted runoff. Impacts of the proposed Master Plan would be **less than significant**.

Project-Level Analysis for Near-Term Projects

The near-term projects under the proposed Master Plan would similarly result in changes to drainage patterns. However, as with the proposed Master Plan program elements, near-term projects would be subject to the same drainage control requirements as described above, which would include adherence to drainage control requirements and implementation of the PDFs that would provide management of stormwater runoff to minimize potential impacts associated with exceedance of drainage system capacities, flooding on- or off site, impedance or redirection of flood flows, or providing additional sources of polluted runoff. As with the proposed Master Plan program, the impacts to drainage patterns from the near-term projects would be **less than significant.**

Impact 4.11-4 The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. (Less than Significant)

As described in Impact 4.11-1 and Impact 4.11-3, all construction activities associated with the proposed Master Plan would be required to comply with the CGP, requiring preparation and implementation of a SWPPP to control runoff from construction work sites. The SWPPP would include BMPs to address the transport of sediment and protect properties from erosion, flooding, or the deposition of mud, debris, or construction-related pollutants. Implementation of BMPs, including physical barriers to prevent erosion and sedimentation, construction of sedimentation basins, limitations on work periods during storm events, use of infiltration swales, protection of stockpiled materials, and a variety of other measures, would substantially reduce the potential for impacts to surface water quality occurring during construction, which is consistent with the applicable Basin Plan policies and objectives, as further described below.

The proposed Master Plan would be subject to the requirements of the Water Quality Control Plan for the Los Angeles Region Coastal Watersheds of Los Angeles and Ventura Counties (i.e., Basin Plan), which outlines water quality objectives for all surface water resources within the Basin, including the nearby San Jose Creek and downstream San Gabriel River. Compliance with the Basin Plan is implemented through WDRs for all surface water discharges, including stormwater. As noted above, all development and redevelopment would be required to implement stormwater BMPs that comply with Basin Plan water quality objectives, including capturing and treating stormwater runoff. Therefore, the proposed Master Plan would not conflict with or obstruct implementation of the Basin Plan. Further, as indicated in Impact 4.11-2, the proposed Master Plan would not conflict with or obstruct implementation of a GSP. As a result, proposed Master Plan impacts would be **less than significant.**

Project-Level Analysis for Near-Term Projects

Proposed near-term projects would be constructed and designed to the same drainage control requirements, as described above for the proposed Master Plan, which is consistent with Basin Plan policies. In addition, the near-term projects would also not conflict with the Spadra Basin GSP. As a result, potential impacts from the near-term projects related to consistency with water quality control plans and groundwater management plans would be **less than significant.**

4.11.4.3 Cumulative Impacts

Impact 4.11-5 The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to hydrology and water quality. (Less than Significant)

The geographic context for the cumulative analysis is the San Gabriel River Watershed for surface water and the San Gabriel Valley Groundwater Basin for groundwater. The proposed Master Plan, along with other projects occurring in the area, would be required to comply with applicable federal, state, and local water quality regulations. Cumulative projects of greater than 1 acre (which includes most of the cumulative projects identified in Table 4.0-1, in Section 4.0, Environmental Analysis), would be required to obtain coverage under the NPDES CGP, which requires project proponents to identify and implement stormwater BMPs in a SWPPP that effectively control erosion and sedimentation and other construction-related pollutants. Further, nearly all cumulative projects would be required to adhere to NPDES MS4 Permit requirements. Such cumulative projects are required to implement site design, source control, and, in some cases, treatment control BMPs to control the volume, rate, and water quality of stormwater runoff from the project during long-term operations. Because adverse water quality and major hydrological alterations are linked to large-scale development projects and industrial and agricultural land uses, the provisions within the various NPDES permits seek to address impacts on a regionwide basis. Through compliance with the noted regulatory requirements, the proposed Master Plan would not have a considerable contribution to any potentially significant cumulative impact related to hydrology and water quality. Therefore, the cumulative impact of the proposed Master Plan related to hydrology and water quality would be **less than significant**.

4.11.5 Mitigation Measures

No mitigation measures are required, as impacts would be less than significant.

4.11.6 Level of Significance After Mitigation

All impacts would be less than significant without mitigation.

4.11.7 References

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4.12 Land Use and Planning

The following analysis identifies potential impacts related to land use and planning resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing land use and planning conditions of the proposed Master Plan area and its vicinity, identifies the regulatory setting, evaluates potential impacts, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts.

No comments related to land use and planning were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are provided in Appendix A.

4.12.1 Environmental Setting

The Cal Poly Pomona campus is situated across portions of the cities of Pomona and Walnut and unincorporated area of Los Angeles County. Spanning 860 acres, the main campus is bordered by Interstate 10 to the north, Valley Boulevard to the east, and West Temple Avenue to the south. Key areas within the campus include Innovation Village, University Village, and portions of the Spadra Landfill, although no development is planned for these sites under the proposed Master Plan. The surrounding region is well-connected with significant transportation access via Interstate 10, State Routes 57 and 60, and Metrolink commuter rail. The area around Cal Poly Pomona features a mix of residential neighborhoods, light manufacturing, and commercial establishments. To the northwest, the campus is bordered by single-family homes in the City of Walnut, while the Forest Lawn Cemetery overlooks it from the north. South of the main campus, residential areas along Valley Boulevard separate Cal Poly Pomona from the light industrial and commercial facilities near the Union Pacific railway tracks. The Cal Poly Pomona's 300-acre Lanterman Development Center is situated southwest of the main campus, adjacent to University-owned 159-acre Spadra Farm, neither of which are proposed for development under the proposed Master Plan. Other nearby institutions include Mount San Antonio Community College.

The jurisdictional area surrounding Cal Poly Pomona includes the City of Pomona, the City of Walnut, the City of Diamond Bar, the City of Industry, and several unincorporated areas of Los Angeles County. The main campus's topography is varied, with rolling hills, orchards, and agricultural land, as well as relatively flat areas developed for academic, residential, and student support uses. The campus is home to approximately 160 buildings, including academic colleges, student housing, recreational facilities, and agricultural resources, totaling approximately 5.95 million gross square feet (GSF) of building space. Existing uses are concentrated in specific areas, with student housing spread across the north and south portions of the main campus, and athletic facilities located at the southern end.

The campus's unique features include agricultural facilities such as the W.K. Kellogg Arabian Horse Center and the Voorhis Ecological Reserve, which support its polytechnic focus on agriculture and environmental sciences. The campus's open spaces, such as quads, parks, and gardens provide passive recreational areas and enhance the aesthetic value of the environment. These spaces include the University Quad, Voorhis Park, and the rose garden, alongside agricultural reserves and field laboratories that support research in agriculture and ecological preservation.

Existing infrastructure includes two large parking structures and surface lots, providing ample parking to accommodate the campus community, with shuttle services to further support mobility within the campus.

4.12.2 Regulatory Setting

4.12.2.1 Federal

There are no federal or state plans, policies, or ordinances relevant to land use and planning that are applicable to the proposed Master Plan.

4.12.2.2 State

California Environmental Quality Act Guidelines

The state Environmental Quality Act (CEQA) Guidelines, Section 15125(d) (14 CCR 15000 et seq.), state that the environmental setting of an environmental impact report (EIR) must discuss "any inconsistencies between the project and applicable General Plans, specific plans, and regional plans." An inconsistency with a General Plan or other policy would not necessarily create an environmental impact. In some cases, a General Plan policy lays out the standard by which an environmental impact is judged to be significant or less than significant.

Although the California State University (the CSU) is not subject to local government planning or ordinances, the analysis in this section has been completed for informational purposes.

Existing Cal Poly Pomona Master Plan

Each CSU campus is required to prepare and submit a campus Master Plan for approval by the Board of Trustees of the California State University (CSU Board of Trustees), indicating the facilities needed to meet a specific enrollment milestone over an estimated period of time. The existing Cal Poly Pomona Master Plan, adopted in 2000, planned for the enrollment of 20,000 full-time equivalent students (FTES[1]) on the campus. Chapter 3, Project Description, Figure 3-2 shows the existing adopted Cal Poly Pomona Master Plan. A number of 2000 Master Plan projects have been implemented as originally proposed.

4.12.2.3 Local

Cal Poly Pomona, as a state entity, is not subject to municipal regulations of surrounding governments for uses on property owned or controlled by Cal Poly Pomona that are in furtherance of the University's education purposes, as described in Section 4.0, Environmental Analysis. However, Cal Poly Pomona may consider, for coordination purposes, aspects of local plans and policies for the communities surrounding the proposed Master Plan area when it is appropriate and feasible, but it is not bound by those plans and policies in its planning efforts. Local plans and policies as they relate to land use and planning are summarized below to provide context for the analysis of potential conflicts with local plans and ordinances, which is provided for informational purposes only in Impact 4.12-2 (see Section 4.12.4, Impact Analysis).

City of Pomona General Plan

The City of Pomona's guiding policy for growth is the 2014 General Plan. This document contains chapters that address population growth, economic development, historic preservation, community design, noise, safety,

[1] FTES is a unit of measurement that considers diverse student workloads (i.e., part-time vs. full-time students) and is used to measure the size of an institution and facilities entitlement for a campus.

utilities, conservation, land use, and more. There is also a special chapter on housing that is updated more frequently to comply with state law (known as the "Housing Element"). In addition to the General Plan, the City of Pomona has other companion documents, such as an Active Transportation Plan and Green Plan (City of Pomona 2014). Relevant General Plan policies include:

Goal 6C.G8: Maintain Cal Poly as a vital part of Pomona.

Goal 6C.G9: Attract Cal Poly students and employees to live, shop, and spend time in Pomona, especially Downtown.

Goal 6C.G10: Improve physical connection and business synergies between Cal Poly Pomona and the City.

Policy 6C.P13: Work with Cal Poly to identify how the City's planning can align with campus planning.

City of Walnut General Plan

The Walnut General Plan establishes the policy framework for land use regulations and guides decisions regarding investments in public infrastructure and facilities, how funding for public services is allocated, and initiatives and strategies to be pursued in order to protect local environmental resources. The General Plan reflects the values of residents, business owners, and elected officials, and—through clearly stated goals, policies, and implementation actions—provides a comprehensive strategy that achieves the community's vision. The plan covers a timeframe extending through 2040. Some policy directives may have a near-term implementation horizon, while others require longer periods to achieve. Through the annual budgeting process, appropriate time frames for implementing goals will be achieved (City of Walnut 2018). Relevant General Plan policies include:

Policy C-2.4: Safe Routes to School Plan – Work with school districts to develop a Safe Routes to School plan, creating a plan for each school in Walnut to expand on school safety programs. Encourage Mt. San Antonio College and Cal Poly Pomona to also plan for safer bicycle and pedestrian access by college students, staff, and faculty. Measures can include evaluation of streets around schools and improvements to student drop-off and pick-up zones. Identify engineering, enforcement, education, and evaluation improvements that maximize pedestrian safety.

Goal CFI-10: Managed growth of Mt. San Antoinio College and Cal Poly Pomona that provides benefits to both the City and these institutions.

Policy CFI-10.1: Higher Education - Support Mt. San Antonio College's and Cal Poly Pomona's comprehensive education programs to promote continuing education and career advancement while minimizing negative impacts on surrounding neighborhoods.

Policy CFI-10.2: Supportive Relationships – Encourage Mt. San Antonio College and Cal Poly Pomona to conduct transparent and open processes for allowing community input on decisions related to campus growth and facility and infrastructure improvements.

Policy CFI-10.3: College Development – Continue to enforce City Zoning Code regulations, City General Plan guidelines, and State and land use law as they may pertain to any proposed development or expansion associated with Mt. San Antonio College and Cal Poly Pomona.

Policy CFI-10.5: Joint Education Programs – Explore opportunities for City consultation with Mt. San Antonio College and Cal Poly Pomona to implement joint projects that would mutually benefit the City and these institutions.

Policy LCD-1.10: Complete Neighborhoods – Encourage the creation of complete neighborhoods that place the accessibility of quality-of-life enhancing retail and commercial uses within walking and biking distance.

Policy LCD-1.11: Pedestrian Connections – Provide convenient and accessible pedestrian connections, through design and complete street elements, between residential areas and nearby commercial areas.

Policy LCD-1.12: Gathering Spaces – Encourage public gathering spaces with flexible areas that allow for passive social gatherings and spaces for public events throughout the City. Consider encouraging in commercial and mixed-use developments a central town square with additional plazas and greens for community gathering spaces, public art, and community events.

Policy LCD-1.15: Infill: Utilize land assembly strategies and incentives to promote compatible infill developments.

Policy LCD-1.17: Public Participation – Ensure that land use and development decisions are being made with the participation of residents, property owners, local organizations, and neighborhood groups.

Goal LCD-2: A distinctive residential character that preserves neighborhoods and open spaces.

Policy LCD-2.1: Neighborhood Quality and Character – Ensure that Zoning regulations and design guidelines protect the character of long-established single-family neighborhoods through limitations of building heights, setbacks, and lot coverage, and through provisions requiring landscaping, architectural integrity, and property maintenance.

Policy LCD-3.6: Façade Upgrades – Target design upgrades and other façade enhancements that maintain the City's standards for high-quality and prevailing desired design aesthetics. Help landowners and landlords recognize that quality, maintained, and up-to-date places promote occupancy of tenant spaces that have been vacant for long periods of time. Goal LCD-5: Land use and development patterns that promote a healthy community.

4.12.3 Thresholds of Significance and Methodology

4.12.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section15064.7). The significance criteria used to evaluate the proposed Master Plan impacts to land use and

planning are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to land use and planning would occur if the proposed Master Plan would:

1. Physically divide an established community.
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4.12.3.2 Methodology

Cal Poly Pomona, as a state entity, is not subject to municipal regulations of surrounding governments for uses on property owned or controlled by Cal Poly Pomona that are in furtherance of the University's education purposes, as described in Section 4.0, Environmental Analysis. Consequently, local general plans, zoning codes, and ordinances do not apply to Cal Poly Pomona. The analysis of the proposed Master Plan's conflicts with these local documents is therefore included for informational purposes only.

4.12.4 Impact Analysis

4.12.4.1 Project Impacts

Impact 4.12-1 The project would not physically divide an established community. (Less than Significant)

Program-Level Analysis for Master Plan

The physical division of an established community typically occurs when significant infrastructure, such as a major highway, railroad, or new development, disrupts the flow of movement within an existing community or between the community and surrounding areas. Such disruptions can isolate neighborhoods, limit access to essential services, or create barriers that impede social and economic interaction. The proposed Master Plan does not include any features that would physically divide an established community. The plan would be focused on optimizing existing campus facilities and infrastructure to meet current and future needs, and it does not propose any development that would create new, large-scale obstructions, such as roadways or rail lines, that could isolate areas within or outside the campus.

The proposed Master Plan would involve several key strategies, including the renovation of existing buildings, demolition and replacement of certain structures within the same physical footprint, minimal new construction at the core of the campus, and retention of most buildings in their current locations. Notably, the associated development with the proposed Master Plan would result in a net increase of approximately 600,000 GSF of building space for academic, student support services, and athletic and recreational facilities. It would also add 1,040 new student housing beds. The overall strategy ensures that campus growth is contained within its existing boundaries, avoiding expansion into areas that could potentially disrupt adjacent communities.

Moreover, the proposed Master Plan would include a comprehensive series of mobility and circulation improvements aimed at enhancing campus connectivity. These improvements would be designed to improve access to and from the campus and facilitate the safe movement of students, faculty, staff, and visitors without creating barriers between the campus and its surrounding areas. Additionally, none of the proposed development associated with the proposed Master Plan would involve removing key roads or access points that connect the campus to the surrounding community. The plan specifically avoids creating infrastructure that would sever

connections to surrounding areas. Additionally, the reconfiguration of intersections and the addition of new wayfinding signage would contribute to safer and more efficient movement without isolating any part of the campus or surrounding neighborhoods.

Therefore, the proposed Master Plan would not physically divide an established community. The plan would focus on optimizing existing campus assets and enhancing connectivity through well-thought-out mobility and infrastructure improvements. The proposed developments would occur within the campus's existing boundary, and key access roads and routes would be retained and improved. The impact of implementation of the proposed Master Plan associated with the physical division of any established communities would be **less than significant**.

Project-Level Analysis for Near-Term Projects

The near-term projects would not include any features that would physically divide an established community. The proposed Master Plan identifies near-term projects to be completed within the first five to ten years, including the construction of the Engineering Graduate Building (Building 14), several building renovations, and the renovation of athletic facilities. These near-term projects would be designed to improve the campus's academic and recreational capacity, as well as its overall infrastructure, without introducing new physical barriers. Specifically, the near-term projects include renovations to the Library (Building 15); Classroom/Lab/Administration Building (Building 98B/C/P); College of Letters, Arts, and Social Sciences (Building 5); College of Environmental Design (Building 7); Old Administration Building (Building 1); College of Science (Building 8); Kellogg West (Buildings 76, 76A, 77, 78); College of Engineering (Building 9); Engineering Labs (Building 17), as well as upgrades to existing athletic facilities such as the Darlene May Gymnasium (Building 41) and the Kellogg Gymnasium (Building 43). These renovations would address critical deferred maintenance and enhance the functionality of existing campus buildings, whereas the new Engineering Graduate Building would consolidate graduate programs and provide new research lab spaces.

The proposed near-term mobility and circulation improvements aimed at enhancing campus connectivity include the reconfiguration of Kellogg Drive and East Campus Drive, the creation of a new campus transit hub (the Bronco Mobility Hub [Building 133]), the campus loop improvements and pedestrian malls, and significant improvements to pedestrian, bicycle, and shuttle access. The Kellogg Drive and East Campus Drive roadway improvements would not only improve the internal campus roadways but also reduce vehicular speeds and improve pedestrian safety. These improvements would be designed to improve access to and from the campus and facilitate the safe movement of students, faculty, staff, and visitors without creating barriers between the campus and its surrounding areas. Therefore, the impact of the near-term projects related to the physical division of any established communities would be **less than significant**.

Impact 4.12-2 The project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)

As discussed in Section 4.12.2, Regulatory Setting, the CSU Board of Trustees is the only agency with land use jurisdiction over campus development, such as those on the Cal Poly Pomona campus. The existing Cal Poly Pomona Master Plan, adopted by the CSU Board of Trustees in 2000, is the primary planning document for the Cal Poly Pomona campus. The 2000 Master Plan provides for space and facility needs to support a planned enrollment of 20,000 FTES on the campus. Chapter 3, Project Description, Figure 3-2 shows the existing adopted Cal Poly Pomona Master Plan. The proposed Master Plan would provide renovated, replacement, and new space for academic, student support services, housing, and athletic and recreational facilities, for a total net increase of approximately 600,000 GSF of

building space on the main campus to support 30,000 FTES. Key strategies of the proposed Master Plan include the renovation of existing buildings, demolition and replacement of certain structures within the same physical footprint, minimal new construction at the core of the campus, and retention of most buildings in their current locations. The proposed Master Plan, if adopted, would supersede the current Master Plan as the applicable land use plan for the Cal Poly Pomona campus.

Cal Poly Pomona, being part of the CSU system, is a state agency and is thus not subject to local government planning and land use plans, policies, or regulations, as described in detail in Section 4.0, Environmental Analysis. Consequently, the City of Pomona General Plan and the City of Walnut General Plan, and related policies and regulations do not apply to Cal Poly Pomona. Therefore, because Cal Poly Pomona is exempt from the local land use plans and related policies and regulations, there would be no conflict or inconsistency with such plans. Additionally, given that the proposed Master Plan, if adopted, would supersede the current Master Plan as the applicable land use plan, potential future development under the proposed Master Plan would not conflict the adopted plans, policies and regulations set forth by the CSU Board of Trustees for the Cal Poly Pomona campus. Therefore, the impacts of the proposed Master Plan related to conflicts with land use plans, policies, and regulations would be **less than significant**.

Although Cal Poly Pomona is not directly subject to local regulations, it remains committed to coordinating with surrounding communities in ways that enhance compatibility and minimize potential environmental impacts. The proposed Master Plan aligns with key goals and policies in the local and county General Plans, even though these plans are not binding. In the City of Walnut General Plan, Policy C-2.4 emphasizes the development of safe routes for students, including pedestrian and bicycle access. The mobility and circulation improvements of the proposed Master Plan, including near-term projects, would improve pedestrian and bicycle access on the Cal Poly Pomona main campus. Additionally, Policy CFI-10.1 and Goal CFI-10 emphasize the importance of supporting educational institutions like Cal Poly Pomona while managing growth in a way that benefits both the University and the surrounding community. The proposed Master Plan, including near-term projects, would facilitate this by expanding the campus in a way that accommodates increasing student enrollment without negatively impacting surrounding neighborhoods. Furthermore, Policy CFI-10.3 emphasizes the need for coordination between Cal Poly Pomona and the City in terms of development. Though the University is exempt from local zoning regulations, it has historically engaged in transparent processes with local governments to address concerns regarding campus development.

Similarly, the City of Pomona's General Plan supports the continued integration of Cal Poly Pomona into the community. Goal 6C.G8 recognizes the University as a vital part of Pomona, which is reinforced by the proposed Master Plan's goal of enhancing the University's academic and recreational facilities. Goal 6C.G9 aims to attract Cal Poly Pomona students and employees to live and engage with Pomona, particularly downtown. The proposed Master Plan, including near-term projects, will support this by offering additional housing and student-focused services. Policy 6C.P13 advocates for collaboration between Cal Poly Pomona and the City of Pomona, ensuring that the campus expansion aligns with broader City planning efforts. Although Cal Poly Pomona is not legally required to comply with local planning policies, the proposed Master Plan, including near-term projects, aligns with City of Pomona's objectives by fostering stronger connections between the University and the City.

In conclusion, although Cal Poly Pomona is exempt from local land use plans, policies, and regulations, the proposed Master Plan, including near-term projects, is aligned with the goals and policies of the City of Walnut and the City of Pomona, ensuring that the proposed Master Plan complements the educational mission of the University while minimizing conflicts with surrounding communities.

4.12.4.2 Cumulative Impacts

Impact 4.12-3 The project would not result in a cumulatively significant impact related to land use and planning. (Less than Significant)

The proposed new development under the proposed Master Plan would occur within the existing boundaries of Cal Poly Pomona's main campus. Although the proposed Master Plan includes a net increase in development of 600,000 GSF, such development would occur entirely within the existing Cal Poly Pomona main campus boundaries. The increased development would support a planned enrollment of approximately 30,000 FTES. Proposed Master Plan development would be located in areas such as the campus core and elsewhere on the main campus, providing that any intensification of use would be within existing established development areas and in alignment with Cal Poly Pomona's long-term planning goals.

Given that the proposed Master Plan would not physically divide an established community and would not result in conflicts with the proposed Master Plan, once adopted, as described in Section 4.12.4.1, Project Impacts, it would not contribute to cumulatively significant land use impacts from cumulative development, described in Section 4.0, Environmental Analysis (Table 4.0-1). Off-campus cumulative development would undergo environmental review and would be required to meet current applicable land use regulations and design standards of the relevant local jurisdiction, such that the cumulative projects would not cause a significant cumulative impact resulting from conflicts with local land use plans, policies, and regulations. As a result, significant cumulative land use impacts are not anticipated from off-campus cumulative development. Even if such significant cumulative land use impacts were to occur from off-campus cumulative impacts, the proposed Master Plan would not have a considerable contribution to such an impact and therefore the cumulative impact would be **less than significant**.

4.12.5 Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

4.12.6 Level of Significance After Mitigation

All impacts would be less than significant without mitigation.

4.12.7 References

Cal Poly Pomona (California State Polytechnic University, Pomona). 2023. *Campus Master Plan Update 2020–2040*. Updated October 2023. Accessed December 31, 2024. https://www.cpp.edu/fpm/pdc/docs/cpp-cmp_admin-draft.v7.1.pdf.

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4.13 Noise and Vibration

The following analysis identifies potential noise and vibration impacts resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing noise conditions of the proposed Master Plan area and its vicinity, identifies the regulatory setting, evaluates potential impacts, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts. The analysis is based on sound pressure level measurements that characterize the existing environment, along with noise modeling for the prediction of noise levels that could result from implementation of the proposed Master Plan. The results of the noise measurements and modeling are summarized in this section and provided in Appendix E. Traffic information used in this section is provided in Appendix F.

No comments related to noise and vibration were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are provided in Appendix A.

4.13.1 Environmental Setting

4.13.1.1 Noise Descriptors

The following are brief definitions of terminology used in this section:

- **Sound**. A disturbance created by a vibrating object, which when transmitted by pressure waves through a medium such as air, is capable of being detected by the human ear or a microphone.
- **Noise.** Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
- **Decibel (dB).** A measure of sound on a logarithmic scale.
- **A-Weighted Decibel (dBA).** An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
- **Equivalent Continuous Noise Level (L_{eq}).** The mean of the noise level, energy averaged over the measurement period.
- **L_{max}.** The maximum noise level during a measurement period.
- **Statistical Sound Level (L_n).** The sound level that is exceeded "n" percent of time during a given sample period. For example, the L_{50} level is the statistical indicator of the time-varying noise signal that is exceeded 50% of the time (during each sampling period). This is also called the "median sound level." The L_{10} level, likewise, is the value that is exceeded 10% of the time (i.e., near the maximum) and this is often called the "intrusive sound level." The L_{90} is the sound level exceeded 90% of the time and is often considered the "effective background level" or "residual noise level."
- **Day-Night Sound Level (L_{dn} or DNL).** The energy-average of the sound levels occurring over a 24-hour period, with a 10 dB offset (penalty) added to the hourly average noise levels from 10:00 p.m. to 7:00 a.m. The nighttime offset is intended to aid in accounting for typical ambient/background environmental sound levels being lower during the nighttime when an introduced sound may be more noticeable.
- **Community Noise Equivalent Level (CNEL).** The energy-average of the A-weighted sound levels during a 24-hour period, with 5 dB added to the hourly average noise levels from 7:00 p.m. to 10:00 p.m. and 10 dB

added to the hourly average noise levels from 10:00 p.m. to 7:00 a.m. Note: For general community/environmental noise, CNEL and L_{dn} values rarely differ by more than 1 dB. As a matter of practice, L_{dn} and CNEL values are considered equivalent/interchangeable.

- **Peak Particle Velocity (PPV).** The peak rate of speed at which soil particles move (e.g., inches per second) due to ground vibration.
- **Sensitive Receiver.** Noise- and vibration-sensitive receivers include land uses where quiet environments are necessary for enjoyment and public health and safety. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes are generally considered sensitive receivers.
- **Vibration Decibel (VdB).** A unitless measure of vibration, expressed on a logarithmic scale and with respect to a defined reference vibration velocity. In the U.S., the standard reference velocity is one microinch per second ($1x10^{-6}$ in/sec).

4.13.1.2 Acoustic Fundamentals

Vibrations, traveling as waves through air from a source, exert a force perceived by the human ear as sound. Sound pressure level (referred to as sound level) is measured on a logarithmic scale in decibels (dB) that represents the fluctuation of air pressure above and below atmospheric pressure. Frequency, or pitch, is a physical characteristic of sound and is expressed in units of cycles per second or hertz (Hz). The normal frequency range of hearing for most people extends from about 20 to 20,000 Hz. The human ear is more sensitive to middle and high frequencies, especially when the noise levels are quieter. As noise levels get louder, the human ear starts to hear the frequency spectrum more evenly. To accommodate for this phenomenon, a weighting system to evaluate how loud a noise level is to a human was developed. The frequency weighting called "A" weighting is typically used for quieter noise levels which de-emphasizes the low frequency components of the sound in a manner similar to the response of a human ear. This A-weighted sound level is called the "noise level" and is referenced in units of dBA. Table 4.13-1 provides references for the a-weighted sound level of typical sources in the home and environment.

Table 4.13-1. Typical Sound Levels in the Environment and Industry

Common Outdoor Activities	Noise Level (dB)	Common Indoor Activities
—	110	Rock Band
Jet Fly-over at 300 meters (1,000 feet)	100	—
Gas Lawn Mower at 1 meter (3 feet)	90	—
Diesel Truck at 15 meters (50 feet), at 80 kilometers/hour (50 miles/hour)	80	Food Blender at 1 meter (3 feet) Garbage Disposal at 1 meter (3 feet)
Noisy Urban Area, Daytime Gas Lawn Mower at 30 meters (100 feet)	70	Vacuum Cleaner at 3 meters (10 feet)
Commercial Area Heavy Traffic at 90 meters (300 feet)	60	Normal Speech at 1 meter (3 feet)
Quiet Urban Daytime	50	Large Business Office Dishwasher Next Room
Quiet Urban Nighttime	40	Theater, Large Conference Room (Background)
Quiet Suburban Nighttime	30	Library
Quiet Rural Nighttime	20	Bedroom at Night, Concert Hall (Background)

Table 4.13-1. Typical Sound Levels in the Environment and Industry

Common Outdoor Activities	Noise Level (dB)	Common Indoor Activities
—	10	Broadcast/Recording Studio
Lowest Threshold of Human Hearing	0	Lowest Threshold of Human Hearing

Source: Caltrans 2020a.

Since sound is measured on a logarithmic scale, a doubling of sound energy results in a 3 dB increase in the noise level. Changes in a community noise level of less than 3 dB are not typically noticed by the human ear under normal, quiet outdoor conditions, and changes of 1 to 3 dB are detectable only under quiet, controlled conditions (e.g., indoors with a limited number of sound sources). A 5 dB increase is readily noticeable (Caltrans 2020). The human ear perceives a 10 dB increase in sound level as a doubling of the sound level (i.e., 65 dBA sounds twice as loud as 55 dBA to a human ear).

An individual's noise exposure occurs over a period of time; however, noise level is a measure of noise at a given instant in time. Community noise sources vary continuously, being the product of many noise sources at various distances, all of which constitute a relatively stable background or ambient noise environment. The background, or ambient, noise level gradually changes throughout a typical day, corresponding to distant noise sources, such as traffic volume, as well as changes in atmospheric conditions.

Noise levels are generally higher during the daytime and early evening when traffic (including airplanes), commercial, and industrial activity is the greatest. However, noise sources experienced during nighttime hours, when background levels are generally lower, can be potentially more conspicuous and irritating to the receiver. To evaluate noise in a way that considers periodic fluctuations experienced throughout the day and night, a concept termed "community noise equivalent level" (CNEL) was developed, wherein noise measurements are weighted, added, and averaged over a 24-hour period to reflect magnitude, duration, frequency, and time of occurrence. A complete definition of CNEL and other terminology used to describe noise is provided in Section 4.13.1.1, Noise Descriptors.

Outdoor Noise Behavior (Sound Reduction Over Distance)

Noise sources are classified in two forms: (1) point sources (such as stationary equipment; or a group of construction vehicles and equipment working within a spatially limited area at a given time; or an athletic event with associated spectators that remain at a fixed location such as an athletic field or stadium), and (2) line sources, such as a roadway with a large number of pass-by sources (motor vehicles). Sound generated by a point source typically diminishes (attenuates) at a rate of 6 dB for each doubling of distance from the source to the receiver at acoustically "hard" sites and at a rate of 7.5 dB for each doubling of distance from source to receiver at acoustically "soft" sites. Sound generated by a line source (i.e., a roadway) typically attenuates at a rate of 3 dB and 4.5 dB per doubling of distance, for hard and soft sites, respectively. Sound levels can also be attenuated by human-made or natural barriers. For the purpose of a sound attenuation analysis, a "hard" or reflective site does not provide any excess ground-effect attenuation and is characteristic of asphalt or concrete ground surfaces, as well as very hard-packed soils. An acoustically "soft" or absorptive site is characteristic of unpaved loose soil or vegetated ground.

4.13.1.3 Negative Effects of Noise on Humans

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and

annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. When community noise interferes with human activities or contributes to stress, public annoyance with the noise source increases, and the acceptability of the environment for people decreases. This decrease in acceptability and the threat to public well-being is the basis for land use planning policies directed toward the prevention of exposure to excessive community noise levels. Hearing loss can occur at the highest noise intensity levels. Hearing loss, one of the more severe consequences of exposure to elevated noise, and annoyance which can result from exposure to various noise sources and levels, ae described in greater detail below.

Hearing Loss

While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise. The Occupational Safety and Health Administration has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over 8 hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter, or ear protection is prescribed.

Annoyance

Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. The L_{dn} as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be some disagreement about the relative annoyance of these different sources. A noise level of about 55 dBA L_{dn} is the threshold at which a substantial percentage of people begin to report annoyance (FICON 1992).

Sleep Disturbance

Uninterrupted sleep is a prerequisite for good physiological and mental functioning, and the primary effects of sleep disturbance are: difficulty in falling asleep; awakenings and alterations of sleep stages or depth; increased blood pressure, heart rate and finger pulse amplitude; vasoconstriction; changes in respiration; cardiac arrhythmia; and increased body movements. The difference between the sound levels of a noise event and background sound levels, rather than the absolute noise level, may determine the reaction probability. The probability of being awakened increases with the number of noise events per night. The secondary, or after-effects, the following morning or day(s) are: reduced perceived sleep quality; increased fatigue; depressed mood or well-being; and decreased performance.

The World Health Organization (WHO) is perhaps the best source of current knowledge regarding the health effects of noise impacts because European nations have continued to study noise and its health effects, while the United States Environmental Protection Agency (USEPA) all but eliminated its noise investigation and control program in the 1970s. According to WHO, sleep disturbance can occur when continuous indoor noise levels exceed 30 dBA or when intermittent interior noise levels reach 45 dBA, particularly if background noise is low. With a bedroom window slightly open (a reduction from outside to inside of 15 dB), the WHO criteria suggest that exterior continuous (ambient) nighttime noise levels should be 45 dBA or below, and short-term events should not generate noise in

excess of 60 dBA. WHO also notes that maintaining noise levels within the recommended levels during the first part of the night is believed to be effective for the ability of people to initially fall asleep (Berglund et al. 1999).

WHO recommends that work that must be conducted during nighttime hours should be governed by an 8–hour L_{eq} of 45 dBA; an additional criterion of 60 dBA L_{max} throughout this 8–hour period is also recommended for discrete or single-noise events. The criteria are to be applied at the exterior façade of any occupied residence that could be impacted by the nighttime noise generation (Berglund et al. 1999).

Physiological Functions

For workers exposed to noise, and in people living near airports, industries and noisy streets, noise exposure may have a large temporary, as well as permanent, impact on physiological functions. After prolonged exposure, susceptible individuals in the general population may develop permanent effects, such as hypertension and ischemic heart disease associated with exposure to high sound levels. The magnitude and duration of the effects are determined in part by individual characteristics, lifestyle behaviors and environmental conditions. Sounds also evoke reflex responses, particularly when they are unfamiliar and have a sudden onset (Berglund et al. 1999).

Other Potential Health Impacts

Other potential health effects of high noise levels identified by WHO include decreased performance for complex cognitive tasks, such as reading, attention span, problem solving, and memorization; physiological effects such as hypertension and heart disease (after many years of constant exposure, often by workers, to high noise levels); and hearing impairment (again, generally after long-term occupational exposure, although shorter-term exposure to very high noise levels, for example, exposure several times a year to concert noise at 100 dBA, can also damage hearing). Finally, noise can cause annoyance and can trigger emotional reactions like anger, depression, and anxiety. WHO reports that, during daytime hours, few people are seriously annoyed by activities with noise levels below 55 dBA or moderately annoyed with noise levels below 50 dBA (Berglund et al. 1999).

4.13.1.4 Vibration Fundamentals

Groundborne vibration is a small, rapidly oscillating motion transmitted through the ground. The strength of groundborne vibration attenuates fairly rapidly over distance. Some soil types transmit vibration quite efficiently; other types (primarily sandy soils) do not. The basic measurement unit commonly used to describe the intensity of ground vibration is peak particle velocity (PPV), in units of inches per second (ips). The calculation to determine PPV at a given distance is as follows:

$$PPV_{dist} = PPV_{ref} *(25/D)^{1.5}$$

In the above expression PPV_{dist} = the peak particle velocity in inches per second (ips) of the vibrating equipment (or transient vibration source, such as a pile-driver hammer drop or controlled detonation) adjusted for distance; PPV_{ref} = the reference vibration level in ips at a reference distance of 25 feet; and D = the distance from the vibration source to the receiver.

Los Angeles County uses a “barely perceptible” vibration level of 0.1 ips PPV for their human annoyance threshold. The vibration velocity level at which most residential building occupants will detect and become annoyed with is approximately 0.2 inches per second PPV. The risk level for minor cosmetic damage to typical residential buildings featuring non-engineered timber and masonry is comparable, generally beginning at a

PPV value of 0.2 inches per second (FTA 2018). The structural damage threshold for newer buildings with concrete foundation and heavy timber or steel framing is 0.5 ips PPV (Caltrans 2020a).

4.13.1.5 Existing Noise Environment

Sensitive Receivers

For the purpose of evaluating potential noise and vibration impacts of the proposed Master Plan, sensitive receivers in the proposed Master Plan vicinity have been identified and mapped to allow quantification of proposed Master Plan-related noise and vibration levels at these existing sensitive receivers. Identified sensitive receivers potentially affected by the proposed Master Plan have been broken down into Off-Campus (situated outside of the main campus boundaries) and On-Campus locations, detailed below.

Off-Campus Sensitive Receivers

Receivers considered sensitive to noise and vibration exposure that are situated around the main campus boundary include single-family homes, mobile homes, and an elementary school. Homes (i.e., single and multiple family residences, apartments, mobile homes) are typically most vulnerable to noise exposure in the overnight period, due to the potential for sleep disturbance to occur; sound attenuation (reduction) from the building usually can reduce elevated exterior noise levels during the daytime to interior levels that are compatible with household activities. For schools, daytime exterior (outdoor) noise is the greatest concern due to exposure of students during recess periods and outdoor physical education activities. Excessive daytime noise levels from sources such as construction activities may interfere with outdoor activities as well as leading to exposure levels that are unhealthful for students at school properties and for residents in the yard areas of homes. Refer to Figure 4.13-1 for the location of identified off-campus sensitive receivers. Each grouping of off-campus receivers is described briefly below.

San Dimas Avenue Residences

This is a neighborhood of single-family homes located to the north of the main campus and on the opposite side of the Interstate 10 (I-10) corridor. The homes in this neighborhood closest to main campus are approximately 900 feet north of the proposed Master Plan boundary.

Camino Del Sur Residences

This is a neighborhood of single-family homes located to the north and northwest of the main campus and on the opposite side of the Interstate 10 (I-10) corridor. The homes in this neighborhood closest to the main campus are approximately 550 feet north of the proposed Master Plan boundary.

Ironshoe Court Residences

This is a neighborhood of single-family homes located approximately 3,000 feet southwest of the proposed Master Plan boundary.

E. Fort Bowie Drive Residences

This is a neighborhood of single-family homes located immediately adjacent and west of the proposed Master Plan boundary.



SOURCE: World Imagery

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FIGURE 4.13-1

Sensitive Receivers

Cal Poly Pomona Campus Master Plan EIR

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Pomona Islander and Walnut Hills Mobile Home Communities

These two mobile home parks adjoin one another, located immediately adjacent and south of the proposed Master Plan boundary, between the main campus and campus property to the south (referred to herein as “south campus”).Kellogg Park Residences

This is a single-family residential neighborhood surrounding Kellogg Park and the Kellogg Polytechnical Elementary School. The neighborhood is adjacent and east of the proposed Master Plan boundary, which is generally represented by the South Campus Drive right-of-way in this area of campus.

Kellogg Polytechnical Elementary School

This school is located east of the main campus, between South Campus Drive and Valley Boulevard. The closest point of any sports field or play area within the school property is approximately 250 feet from the proposed Master Plan boundary.

On-Campus Sensitive Receivers

On-campus receivers considered sensitive to noise and vibration exposure include residence halls (dormitories), student apartments, Manor House (official residence of the Cal Poly Pomona President), lodging facilities, library, and a high school. Structures that include sleeping accommodations (i.e., residence halls, student apartments, Manor House and lodging facilities) are typically most vulnerable to noise exposure in the overnight period, due to the potential for sleep disturbance to occur; sound attenuation (reduction) from the building usually can reduce elevated exterior noise levels during the daytime to interior levels that are not disruptive of indoor activities. For schools, daytime exterior (outdoor) noise is the greatest concern due to exposure of students during recess periods and outdoor physical education activities. Excessive daytime noise levels from sources such as construction activities may interfere with use of school sports fields or outdoor amenity areas associated with campus housing as well as leading to exposure levels that are unhealthful for students. The University Library represents a quiet sanctuary allowing concentration and productive study. While libraries are designed to deliver exceptional sound attenuation from exterior to interior, excessive sound levels and/or spikes of sound associated with construction equipment and activities may result in interior noise levels that interrupt library users. Refer to Figure 4.13-2 for the location of identified on-campus sensitive receivers. On-campus receivers are described briefly below.

University Library (Building 15)

The University Library is situated at the southern edge of the campus core (see Figure 4.13-2), adjacent to the south side of the Engineering Annex.

Manor House (Building 111)

The official residence of the Cal Poly Pomona President, Manor House, sits just north of the campus core (see Figure 4.13-2).

Kellogg West Lodge (Buildings 76, 76A. 77 and 78)

Kellogg West Conference Center and Hotel are located just south and west of the campus core. This facility is available to host conferences and provide traditional lodging for members of the public; use is therefore not exclusive to Cal Poly Pomona functions or guests.

Residence Halls

Residence halls are generally clustered near the center of main campus, southeast of the campus core and northwest of the baseball and football stadiums. Refer to Figure 4.13-2 for the location of the residence halls listed below.

- Building 54 - Vista Del Estrellas
- Building 60 - Vista Bonita
- Building 61 - Vista del Sol
- Building 62 - Vista de las Montanas
- Building 63 - Vista de la Luna
- Building 73 - Sicomoro
- Building 74 – Secoya

University Village (Building 200)

Student housing in the form of apartment buildings is clustered within University Village, located in south campus between mobile home communities on the southwest and Temple Drive and Innovation Village research park on the northeast.

International Polytechnic High School (I-Poly) (Building 85)

I-Poly is located along the southern border of the main campus, on the north side of the intersection of West Temple Avenue and South Campus Drive. The I-Poly facility includes a surface parking lot, and interconnected buildings providing interior space for education and administration functions. The athletic program for I-Poly is allowed to use the adjacent sports facilities of CPP; separate outdoor athletic facilities are not located within the I-Poly campus. Classroom buildings are typically not considered a noise-sensitive receiver; however, since a library (an exceptionally noise-sensitive use) is assumed to be housed in the I-Poly buildings, the I-Poly buildings are conservatively treated as a noise-sensitive receiver.

On-Campus Receivers Not Considered Sensitive

In general, commercial spaces are not considered noise sensitive where principal activities are conducted indoors, as the attenuation provided by the building shell (i.e., exterior walls, roof, doors and windows) can achieve interior noise levels compatible with the functional needs of the space and tenants. On-campus buildings that contain classrooms, office and administrative space, labs, dining facilities, athletic space, mechanical systems, and workshops are not considered noise sensitive.



SOURCE: California State Polytechnic University, Pomona 2024; World Imagery

Cal Poly Pomona is in the process of auditing and updating their building information (names/numbers). There may be future inconsistences due to these changes.

FIGURE 4.13-2

On-Campus Noise Sensitive Receivers and Proximity to Proposed Near Term Projects

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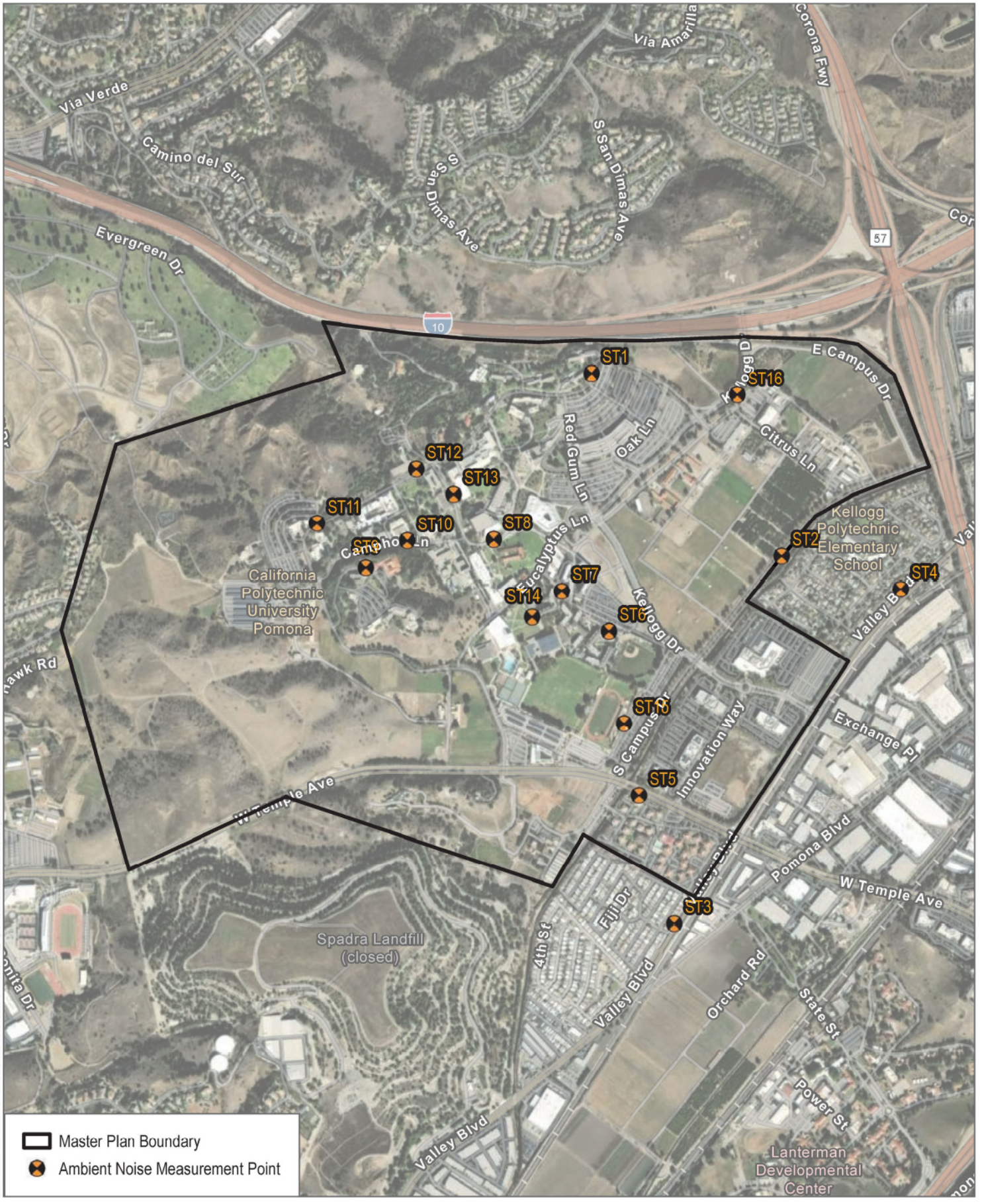
Ambient (Baseline) Community Noise Levels

The primary noise sources in the proposed Master Plan area consist of vehicle traffic on freeways (Interstate 10 [I-10] located as close as 100 feet to the north of the main campus and State Route 57 [SR 57] located as close as 150 feet to the east of main campus), and major roadways bordering the main campus (including South University Drive, Camphor Lane, West Temple Avenue, East Valley Boulevard, and Kellogg Drive). Noise on campus is also generated by mechanical systems, and students and people engaging in educational activities and associated with various events on campus.

Noise measurements were conducted in and around the campus on December 4 and 5, 2024, to determine the existing noise levels. The measurements were made using a calibrated Rion-52 integrating sound level meter, which meets the current American National Standards Institute standard for a Type 1 precision sound level meter. The sound meter was positioned at a height of approximately 5 feet above ground on a tripod, and the measurement microphone was covered with a windscreen. Table 4.13-2 provides relevant data for the existing noise measurements including measurement purpose per location, perceived sound sources during the measurements, time and date of the measurements, and sound level results employing several metrics.

Noise measurement locations 1 through 16 are illustrated in Figure 4.13-3, Ambient Sound Level Measurement Locations. These locations were selected to provide samples of typical ambient noise levels at existing noise-sensitive land uses in the proposed Master Plan vicinity (see Figures 4.13-1 and 4.13-2) and/or to support collection of sound level data and vehicle counts for calibration of the traffic model (see Section 4.13.3.3, Methodology, for additional information). As summarized in Table 4.13-2, the measured outdoor noise level (L_{eq}) ranged from 72.9 dBA at measurement location ST-5 to 52.4 dBA at measurement location ST-13. More detailed field survey data sheets describing these outdoor sound level measurements and the background environmental conditions are provided in Appendix E.

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SOURCE: World Imagery

FIGURE 4.13-3

Ambient Sound Level Measurement Locations

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Table 4.13-2. Measured Ambient Outdoor Noise Levels

ID	Measurement Purpose at Location	Perceived Sound Source(s)	Date	Time	L_{eq}[1]	L_{max}[2]	L_{min}[3]	L_{90}[4]	L_{50}[5]	L_{10}[6]
ST-1	General noise exposure from I-10. Data to calibrate TNM for roadway segment **(S. University Dr.)**	Traffic (near and far), distant aircraft	12/4/24	10:57 a.m. - 11:13 a.m.	65	81.5	54.7	57.1	61.7	66.6
ST-2	Baseline noise for **Kellogg Poly Elem. School** (Off-Campus**).** Data to calibrate TNM for roadway segment **(S. Campus Dr.)**	Traffic, rustling leaves, birds	12/5/24	11:22 a.m. - 11:37 a.m.	65.6	75.4	54.2	56.5	61.3	70
ST-3	Baseline noise for **Mobile Home Communities** (Off-Campus**).** Data to calibrate TNM for roadway segment **(Valley Blvd.)**	Traffic, birds	12/4/24	9:52 a.m. - 10:08 a.m.	68.6	86.6	46.1	50.9	59.9	71.9
ST-4	Baseline noise for **Kellogg Park Residences** (Off-Campus**).** Data to calibrate TNM for roadway segment **(Valley Blvd.)**	Traffic, birds	12/4/24	10:16 a.m. - 10:32 a.m.	65.6	75.6	56.2	58.6	62.6	69.2
ST-5	Baseline noise for **University Village** (On-Campus Apartments**).** Data to calibrate TNM for roadway segment **(W. Temple Ave.)**	Traffic, distant conversation, rustling leaves	12/4/24	3:51 p.m. - 4:06 p.m.	72.9	88.5	50.5	57.6	68.2	76.8
ST-6	Baseline noise for **Vista de la Luna and Vista de las Montanas (Blds 63 and 62)**	Traffic (near and far), distant aircraft, distant conversation	12/4/24	6:18 p.m. - 6:48 p.m.	54	65.5	47.9	50	52.1	57.2
ST-7	Baseline noise for **Sicomoro and Secoya (Blds 73 and 74)**	Nearby conversation	12/4/24	7:27 p.m. - 7:57 p.m.	50.8	60.9	47.6	—	—	—

Table 4.13-2. Measured Ambient Outdoor Noise Levels

ID	Measurement Purpose at Location	Perceived Sound Source(s)	Date	Time	L_{eq}[1]	L_{max}[2]	L_{min}[3]	L_{90}[4]	L_{50}[5]	L_{10}[6]
ST-8	Baseline noise for **University Library (Bld 15)**	Traffic, distant conversation, rustling leaves	12/4/24	12:46 p.m. - 1:16 p.m.	53.6	70.4	44	46	49.3	56.4
ST-9	Baseline noise for **Kellogg West Lodge (Blds 76, 76A, 77, 78)**	Traffic (near and far), distant aircraft	12/4/24	5:30 p.m. - 6:00 p.m.	53.3	72	44.2	45.3	46.8	51.2
ST-10	Baseline noise for **Kellogg West Lodge (Blds 76, 76A, 77, 78)**	Traffic, birds, distant conversation	12/4/24	4:56 p.m. - 5:26 p.m.	57.5	75.4	45.6	46.5	49.4	61
ST-11	Data to calibrate TNM for roadway segment **(S. University Dr.)**	Traffic, distant conversation	12/4/24	4:24 p.m. - 4:44 p.m.	58.3	72.4	46.2	48.6	53.9	62
ST-12	Baseline noise for **Manor House (Bld 111)**	Traffic, birds, distant conversation	12/4/24	11:37 p.m. - 11:52 p.m.	59.6	72.3	51.2	54.1	57.7	62
ST-13	Baseline noise for campus core in general	Traffic, distant conversation	12/4/24	11:59 p.m. - 12:29 p.m.	52.4	63.8	46.3	47.8	50.1	55
ST-14	Baseline noise for **Vista del Estrellas, Vista Bonita, Vista del Sol (Blds 54, 60, 61)**	Traffic, distant aircraft, distant conversation	12/4/24	6:56 p.m. - 7:26 p.m.	53.1	70.6	48.1	49.3	50.8	53.8
ST-15	Data to calibrate TNM for roadway segment **(S. Campus Dr.)**	Traffic, distant traffic, rustling leaves, birds	12/4/24	3:14 p.m. - 3:44 p.m.	57.6	94	48.7	51	53.7	58.7
ST-16	Data to calibrate TNM for roadway segment **(S. Kellogg Dr.)**	Traffic, distant traffic, rustling leaves	12/4/24	1:28 p.m. - 1:44 p.m.	68	81.7	54.9	59	65.9	71.4

Source: Appendix E

Notes:

1 Equivalent continuous sound level; 2 Maximum sound level during the measurement period; 3 Minimum sound level during the measurement period.

4 Sound level exceeded 90% of the time during the measurement period; 5 Sound level exceeded 50% of the time during the measurement period;

6 Sound level exceeded 10% of the time during the measurement period; "- -" Indicates lost data (L90, L50, and L10 data for ST7)

4.13.2 Regulatory Setting

4.13.2.1 Federal

United States Environmental Protection Agency

The USEPA has determined that over a 24-hour period, exposure to an L_{eq} of 70 dBA will result in some hearing loss. Interference with activity and annoyance will not occur if exterior levels are maintained at a L_{eq} of 55 dBA and interior levels are maintained at or below 45 dBA L_{eq}. While these levels are relevant for planning and design and useful for informational purposes, they are not land use planning criteria because they do not consider economic cost, technical feasibility, or the needs of the community; therefore, they are not mandated.

In consideration of the difficulty of achieving a goal of 55 dBA L_{dn} as an exterior noise level exposure standard, most federal and California agencies have settled on 65 dBA L_{dn} level as their standard. At 65 dBA L_{dn}, activity interference is kept to a minimum, and annoyance levels are still low. 65 dBA L_{dn} as an exterior exposure standard has also been widely demonstrated as a level that can realistically be achieved in residential areas; this exposure level also supports the ability to achieve in interior standard of 45 dBA L_{dn} with standard residential construction techniques and materials.

Federal Transit Administration

In its Transit Noise and Vibration Impact Assessment guidance manual, the Federal Transit Administration (FTA) recommends a daytime construction noise level threshold of 80 dBA L_{eq} over an eight-hour period when detailed construction noise assessments are performed to evaluate potential impacts to community residences surrounding a project (FTA 2018). The FTA also recommends using a construction noise threshold of 75 dBA L_{dn} averaged over 30 days for residences exposed to construction noise lasting 30 days or longer. Although this FTA guidance is not a regulation, it can serve as a quantified standard in the absence of such limits at the state and local jurisdictional levels.

Federal InterAgency Committee on Noise

For the assessment of project noise impacts and degradation of the existing ambient noise environment, significance thresholds developed by the Federal Interagency Committee on Noise (FICON) are often employed. FICON specifies a maximum allowable increase in noise level (using CNEL), which is dependent upon the baseline ambient noise level. Under FICON recommended criteria (FICON 1992), as existing ambient noise increases, the threshold level for the allowable increase in noise exposure resulting from a project is reduced (i.e., the allowable increase in noise level has an inverse relationship with the ambient noise levels without a project). Table 4.13-3 illustrates the FICON criteria considered when evaluating noise generated by a project. If sensitive receivers would be exposed to long-term project noise increases exceeding these criteria, impacts may be considered significant.

Table 4.13-3. Significance of Changes in Community Noise Exposure Level

Existing Noise Exposure (dBA CNEL)	Allowable Noise Exposure Increase / Significance Threshold (dBA CNEL)
Less than 60	5
60 - 65	3
Greater than 65	1.5

Source: FICON 1992.

Notes: dBA = A-weighted decibel. CNEL = Community Noise Equivalent Level.

4.13.2.2 State

California Noise Control Act of 1973

Sections 46000 through 46080 of the California Health and Safety Code, known as the California Noise Control Act of 1973, declares that excessive noise is a serious hazard to the public health and welfare and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. It also identifies a continuous and increasing bombardment of noise in the urban, suburban, and rural areas. The California Noise Control Act declares that the State of California has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the state to provide an environment for all Californians free from noise that jeopardizes their health or welfare.

General Plan Guidelines

The State of California, through its General Plan Guidelines, provides guidance on how ambient noise should influence land use and development decisions and includes a table of recommended maximum exterior noise levels by land use, expressed in CNEL. The General Plan Guidelines provide cities with recommended community noise and land use compatibility standards that can be adopted or modified at the local level based on conditions and types of land uses specific to that jurisdiction.

California Building Code Noise Insulation Standards

The California Building Code is Title 24 of the California Code of Regulations (CCR). In 1974, the California Commission on Housing and Community Development adopted noise insulation standards for hotels, motels, dormitories, and multifamily residential buildings (CCR Title 24, Part 2). Title 24 establishes standards for interior room noise (attributable to outside noise sources or adjacent dwelling units). The regulations also specify that acoustical studies must be prepared whenever a multifamily residential building or structure is proposed to be located in an area with a CNEL (or L_{dn}) of 60 dBA or greater without development of the project. Such acoustical analysis must demonstrate that the residence has been designed to limit intruding noise to an interior CNEL (or L_{dn}) of at least 45 dBA (CCR Title 24 Noise Standards, Chap. 2-35).

CALGreen

The State of California's noise insulation standards for nonresidential uses are codified in CCR Title 24, Part 11, California Green Building Standards Code (CALGreen). CALGreen noise standards are applied to new or renovation construction projects in California to control interior noise levels resulting from exterior noise sources. Proposed projects may use either the prescriptive method (Section 5.507.4.1) or the performance method (Section 5.507.4.2) to show compliance. Under the prescriptive method, a project must demonstrate appropriate transmission loss ratings for the wall and roof/ceiling assemblies and exterior windows when located within a noise environment of 65 dBA CNEL or higher. Under the performance method, a project must demonstrate that interior noise levels would not exceed 50 dBA $L_{eq(1hr)}$.

California State University

As a State of California entity, the California State University (CSU) system has "Contract General Conditions for Collaborative Design-Build Major Projects" that include the following Sound Control Requirements of Design-Builders that would construct near-term and other site-specific projects implemented under the proposed Master Plan (CSU 2025):

- The Design-Builder shall comply with all sound control and noise level rules, regulations and ordinances which apply to the work. In the absence of any such rules, regulations and ordinances, the Design-Builder shall conduct its work to minimize disruption to others due to sound and noise from the workers, and shall be responsive to the CSU Board of Trustees' requests to reduce noise levels.
- Design-Builder shall not cause or allow sounds to be produced in excess of 65 decibels measured at the job site between the hours of 7:00 p.m. and 7:00 a.m. Design-Builder shall not cause or allow sounds to be produced in excess of 85 decibels measured at the job site between the hours of 7:00 a.m. and 7:00 p.m. without the consent of the University.
- Each internal combustion engine, used for any purpose on the project or related to the project, shall be equipped with a muffler of a type recommended by the manufacturer. No internal combustion engine shall be operated on the project without a muffler.
- Loading and unloading of construction materials will be scheduled so as to minimize disruptions to University activities. Construction activities will be scheduled to minimize disruption to the University and to University users.

The above 85 dBA threshold for construction noise during daytime hours (7:00 a.m. to 7:00 p.m.) is compatible with the FTA guidance of 85 dBA for nonresidential receiving land uses. Similar standards appear in CSU contract documents for other construction delivery methods.

4.13.2.3 Local

The Cal Poly Pomona campus, which is located partially in the City of Pomona, partially in the City of Walnut, and partially in an unincorporated portion of Los Angeles County (County), would have the potential to impact off-campus noise-sensitive land uses in Pomona, Walnut and the County. While, as a state entity, Cal Poly Pomona is not subject to local government permitting or planning regulations, policies, or ordinances, such as the general plans and ordinances for the City of Pomona, City of Walnut and the County of Los Angeles, this noise and vibration analysis considers these local plans and regulations as guidance to develop appropriate noise and vibration significance thresholds for assessing off-campus impacts. Thus, the following are excerpts from the City of Pomona General Plan, City of Walnut General Plan, and the County of Los Angeles General Plan, which supplement the previously described federal and state guidance for suitable noise and vibration impact significance thresholds. See Section 4.13.3.1, Thresholds of Significance, for additional information about noise and vibration impact significance thresholds.

City of Pomona General Plan Noise and Safety Element Criteria

The City of Pomona General Plan Noise and Safety Element (City of Pomona 2014) is written to ensure compliance with state requirements through a comprehensive, long-range program of achieving acceptable noise levels throughout the City. The Noise Element identifies noise-generating uses and activities within City limits, the most dominant of which include major freeways and highways such as State Route 60, Interstate 10, State Route 57,

and State Route 71; aerial streets; railroads; and the Los Angeles County Fairplex. Brackett Field, a general aviation airport located in the City of La Verne, generates significant noise during flight operations; however, the 65 and 60 dBA CNEL noise contours do not cross City of Pomona boundaries. The City's Noise Element also identifies future growth and development within City limits as a major contributor to future noise increases, particularly with regard to residential and shipping traffic, and downtown infill development.

City of Pomona Noise Ordinance

The City of Pomona's Noise Ordinance provides restrictions for allowable noise levels in specific designated noise zones. As stated in Section 14.9-4 of the City of Pomona Noise Ordinance, the assigned noise zones are (City of Pomona 2021):

- Noise Zone 1—Single-family residential properties
- Noise Zone 2—Multiple-family residential properties
- Noise Zone 3—Commercial properties
- Noise Zone 4—Industrial properties
- Noise Zone 5—High-traffic corridors.

Section 14.9-5 of the City of Pomona Noise Ordinance establishes acceptable exterior and interior noise standards for each noise zone, using the dBA scale, as shown in Table 4.13-4.

Table 4.13-4. City of Pomona Exterior Noise Standards

Noise Zone	Time Interval	One-Hour Average Sound Level (Decibels)
1	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	60 50
2	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	65 50
3	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	65 60
4	Anytime	70
5	Anytime	70

Source: City of Pomona 2021.

Sections 18-311(b) through (e) of the Noise Ordinance state the following:

> (b) It shall be unlawful for any person at any location within the incorporated area of the city to create any noise or to allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person which causes the noise level, when measured on any other property, to exceed the following:
>
> (1) The noise standard for a cumulative period of more than 30 minutes in any hour;
>
> (2) The noise standard plus five dB(A) for a cumulative period of more than 15 minutes in any hour;
>
> (3) The noise standard plus 10 dB(A) for a cumulative period of more than five minutes in any hour;
>
> (4) The noise standard plus 15 dB(A) for a cumulative period of more than one minute in any hour; or

(5) The noise standard plus 20 dB(A) for any period of time.

(c) If the ambient noise level exceeds any of the noise limit categories in subsections (b)(1) through (4) of this section, the cumulative period applicable to such category shall be increased to reflect such ambient noise level. If the ambient noise level exceeds the noise limit category in subsection (b)(5) of this section, the maximum allowable noise level under such category shall be increased to reflect the maximum ambient noise level.

(d) If the measurement location is on a boundary between two different noise zones, the lower noise level standard applicable to the noise zone shall apply.

(e) If the intruding noise source is continuous and cannot reasonably be discontinued or stopped for a time period whereby the ambient noise level can be determined, the measured noise level obtained while the source is in operation shall be compared directly to the allowable noise level standards as specified respective to the measurement location's designated land use and for the time of day the noise level is measured. The reasonableness of temporarily discontinuing the noise generation by an intruding noise source shall be determined by the chief of police for the purpose of establishing the existing ambient noise level at the measurement location.

Section 18-309 of the City's Noise Ordinance addresses groundborne vibration:

Notwithstanding other sections of this article, it shall be unlawful for any person to create, maintain or cause any ground vibration which is perceptible without instruments at any point on any affected property adjoining the property on which the vibration source is located. For the purpose of this article, the perception threshold shall be presumed to be more than 0.05 inch per second RMS vertical velocity.

Exemptions to the above standards are provided in Section 18-305(3) (Exemptions) of the City of Pomona Noise Ordinance, including construction noise and vibration as listed below:

(1) Occasional outdoor gatherings, public dances, shows, and sporting and entertainment events, provided such events are conducted pursuant to a permit or license issued by the city relative to the staging of such events. Notwithstanding the foregoing, any conditional use permit or other permit issued by the City of Pomona requiring the permittee to abide by this article shall not be entitled to an exemption under this section without express action of such exemption.

(2) Except as provided in Section 14-399, any mechanical device, apparatus or equipment used, related to or connected with emergency machinery, vehicle, work or warning alarm or bell, provided the sounding of any bell or alarm on any building or motor vehicle shall terminate its operation within 30 minutes in any hour of its being activated.

(3) Noise sources associated with or vibration created by construction, repair, remodeling or grading of any real property or during authorized seismic surveys, provided such activities do not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or at any time on Sunday or a federal holiday, and provided the noise level created by such activities do not exceed the noise standard of 65 dB(A) plus the limits specified in Section 18-311(b) as measured on residential property and any vibration created does not endanger the public health, welfare and safety.

(4) All mechanical devices, apparatus or equipment associated with agricultural operations, provided:

a. Operations do not take place between 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or at any time on Sunday or a federal or state holiday;

b. Such operations and equipment are utilized for the protection or salvage of agricultural crops during periods of potential or actual frost damage or other adverse weather conditions; or

c. Such operations and equipment are associated with agricultural pest control through pesticide application, provided the application is made in accordance with permits issued by or regulations enforced by the county department of agriculture.

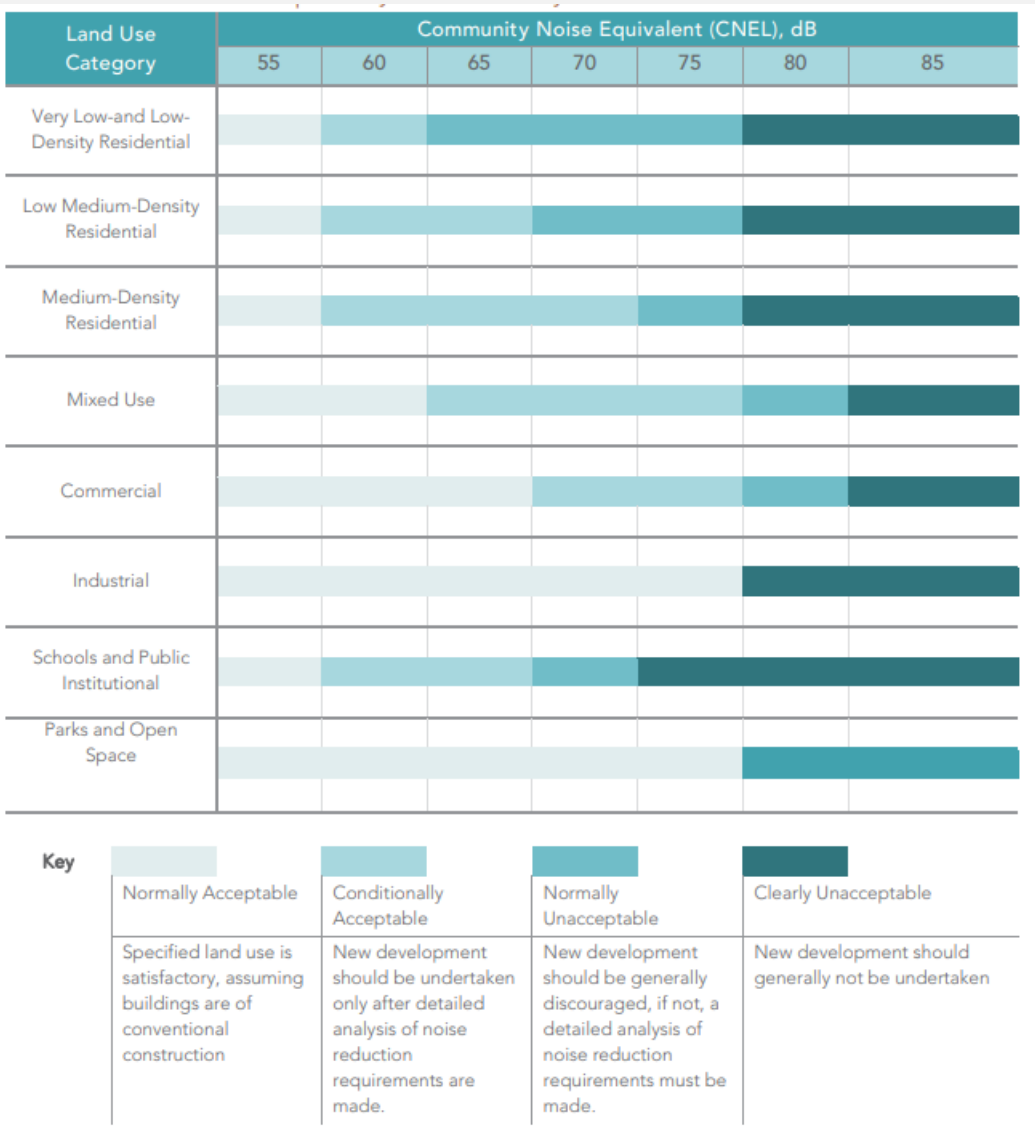
(5) Noise sources associated with the maintenance of real property, provided such activities take place between the hours of 7:00 a.m. and 8:00 p.m. on any day except Sunday or between the hours of 9:00 a.m. and 8:00 p.m. on Sunday.

(6) Any activity to the extent regulation thereof has been preempted by state or federal law.

City of Walnut General Plan Noise Element Criteria

The Walnut Noise Element addresses noise that affects the broader community, rather than noise associated with site-specific conditions. The goals and policies guide decisions concerning how properties are used in relation to roads, the existing railroad within the adjacent City of Industry, and commercial and industrial businesses; as these tend to be the most common sources of noise in an urbanized area. Exhibit N-4 of the Noise Element establishes the noise criteria adapted from the OPR's General Plan Guidelines to reflect Walnut's land uses to be employed in the review of development proposals.

Exhibit N-4 (Walnut General Plan Noise Element)



Relevant Noise Element Policies:

Policy N-1.1: Land Use/Project Evaluation: Use the Land Use Compatibility for Community Noise Environments scale (Figure N-4), the Future Noise Contour Map (Figure N-5) and the WMC to evaluate land use decisions to mitigate unnecessary noise impacts or discourage further unmitigated noise inducing developments.

Policy N-1.3: Minimize Noise Impacts: Minimize noise impacts in the community to ensure that noise does not detract from Walnut's quality of life.

Policy N-1.6: Stationary Noise Sources: Minimize stationary noise impacts on sensitive receptors, and require control of noise from construction activities, private developments/ residences, landscaping activities, and special events.

Policy N-1.7: Noise Mitigation: Require development projects to implement mitigation measures, where necessary, to reduce noise levels to meet adopted standards and criteria. Such measures may include, but are not limited to, berms, walls, and sound-attenuating architectural design and construction methods.

Policy N-1.8: Mixed Use: Require that mixed-use structures and areas be designed to minimize the transfer of noise from commercial uses to residential uses. Policy N-1.9: Industrial Uses and Equipment Require analysis and implementation of techniques to control the effects of noise from industrial sources, utilities, and mechanical equipment.

City of Walnut Municipal Code

Chapter 16 of the Walnut Municipal Code (Noise) sets allowable exterior noise exposure limits per land use.

Table 4.13-5. City of Walnut Exterior Noise Standards

Receptor: Land Use	Time Interval	One-Hour Average Sound Level (Decibels)
Residential	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	50 45
Commercial	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	60 55
Industrial	Anytime	70

Source: City of Walnut.

Los Angeles County Code of Ordinances

Construction Noise

Section 12.08.440, Construction Noise, of the County of Los Angeles Code of Ordinances (County Code) addresses construction noise and vibration restrictions. Table 4.13-6 presents a summary of construction noise limits found in County Code Section 12.08.440 for construction projects lasting more than 10 days.

Table 4.13-6. Los Angeles County Construction Noise Limits

	Single-family Residential	Multifamily Residential	Semi-Residential and Commercial	Business Structures
Mobile Equipment – Less Than 10 Days				
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	75 dBA	80 dBA	85 dBA	85 dBA
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	60 dBA	64 dBA	70 dBA	85 dBA

Table 4.13-6. Los Angeles County Construction Noise Limits

	Single-family Residential	Multifamily Residential	Semi-Residential and Commercial	Business Structures
Stationary Equipment – 10 Days or More				
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	60 dBA	65 dBA	70 dBA	N/A
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	50 dBA	55 dBA	60 dBA	N/A

Source: County of Los Angeles Code, Section 12.08.440.
Notes: dBA = A-weighted decibels; N/A= not applicable.

As presented in Table 4.13-5, construction activity is prohibited between the hours of 8:00 p.m. and 7:00 a.m. Monday through Saturday and all day on Sundays, where the noise would create a disturbance across a residential property line, except by variance issued by a health officer. The most stringent standard applies to single-family residences, which is used in this analysis to address the most conservative case, and because within the unincorporated County area, single-family residences are the closest noise-sensitive use to the proposed Master Plan area. For single-family residences, the disturbance noise level limit between 8:00 p.m. to 7:00 a.m. is defined as greater than 50 dBA for construction equipment at a static location for a duration greater than 10 days (i.e. "stationary equipment," Section 12.08.440[B][1][b], Construction Noise of the County Code). The 7:00 a.m. to 8:00 p.m. limit for noise exposure at any single-family residential property affected by stationary construction noise is 60 dBA (Section 12.08.440[B][1][b], Construction Noise of the County Code). For mobile construction equipment, the 7:00 a.m. to 8:00 p.m. limit for noise exposure at any single-family residential property affected by construction noise is 75 dBA (Section 12.08.440[B][1][b], Construction Noise of the County Code).

For the purposes of interpreting the standards presented in Table 4.13-5, "stationary equipment" would be equipment that is set at a given location and would remain at that location over the course of the construction phase. Equipment, such as generators for electrical power, air compressors, and mixers for cement or mortar represent the primary examples of stationary equipment. "Mobile equipment" refers to dozers, scrapers, front-end loaders, and similar equipment that moves within multiple on-site locations to perform work, and to trucks used to transport equipment and materials to and from the proposed Master Plan area. Hence, mobile-equipment-use and off-site construction traffic noise must not exceed 75 dBA L_{eq} at single-family residences, 80 dBA L_{eq} at multifamily residences, or 85 dBA L_{eq} at commercial properties within Los Angeles County between 7:00 a.m. to 8:00 p.m., Monday through Saturday.

Construction Vibration

Operating or permitting the operation of any device that creates vibration which is above the vibration perception threshold of any individual at or beyond the property boundary of the source is prohibited (County Code Section 12.08.560). The California Department of Transportation (Caltrans) minimum perception level of 0.1 PPV in/sec is used for this threshold.

Exterior Noise Standards

Section 12.08.390, Exterior Noise Standards, of the County Code establishes the maximum exterior noise level that may be generated within each of the designated noise zones, as generated by on-site (stationary) noise sources

and activities. The noise zone descriptions and allowable exterior noise limits from Section 12.08.390 are translated into the County Noise Element as Table 11.2 (reproduced as Table 4.13-7, Los Angeles County Community Noise Criteria, below). Only the residential standard is included below, there are no commercial uses in Los Angeles County adjacent to the Cal Poly Pomona main campus.

Table 4.13-7. Los Angeles County Community Noise Criteria

Noise Zone	Land Use of Receptor Property	Time	Std 1 L50 (30 min/hr)	Std 2 L25 (15 min/hr)	Std 3 L8.3 (5 min/hr)	Std 4 L1.7 (1 min/hr)	Std 5 L0 (at no time)
II	Residential[b]	10:00 p.m. to 7:00 a.m.	45	50	55	60	65
		7:00 a.m. to 10:00 p.m.	50	55	60	65	70

Source: Section 12.08.390 of the Los Angeles County Code (a portion of the Noise Control Ordinance).
Notes:
L50 Equates to the statistical noise level which is exceeded during 50% of the designated time period, or 30 minutes in an hour.
L25 Equates to 12.5 minutes per hour during which the identified limit level is allowed.
L8.3 Equates to 5 minutes per hour during which the identified limit level is allowed.
L1.7 Equates to 1 minute per hour during which the identified limit level is allowed.

Los Angeles County General Plan

The Los Angeles County General Plan was adopted by the Board of Supervisors on October 6, 2015. The Noise Element establishes noise generation limits for each land use type and provides noise management policies to protect residents from excessive noise exposure. According to the General Plan, the County adapted the Governor's Office of Planning and Research Land Use Compatibility for Community Noise Environments Matrix to develop the County's exterior noise standards, which are illustrated in Table 4.13-6. In other words, the General Plan references the County Code exterior noise standards, rather than establishing separate exterior noise limits. By controlling the noise generation from individual properties within a given land use designation (or zone district), all uses should be afforded protection against excessive noise exposure. Section 12.08.390 of the County Code stipulates that if the ambient noise level (as defined by the L_{50} value from an ambient noise measurement) exceeds the Standard 1 noise level allowance, the measured L_{50} becomes the Standard 1 allowance.

4.13.3 Thresholds of Significance and Methodology

4.13.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section15064.7). The significance criteria used to evaluate the proposed Master Plan area impacts related to noise

and vibration are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to noise and vibration would occur if the proposed Master Plan area would:

1. Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
2. Result in generation of excessive groundborne vibration or groundborne noise levels.
3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

In analyzing noise and vibration impacts associated with the project, pertinent noise standards introduced in Section 4.13.2, Regulatory Setting, have been considered and used, where relevant, to develop the following quantified significance thresholds for Thresholds 1 and 2 above.

- **Temporary Construction Noise (Threshold 1):** For temporary construction activities associated with the proposed Master Plan, a significant impact would result if construction noise during daytime hours (7:00 a.m. to 7:00 p.m.) exceeds 80 dBA L_{eq} over an 8-hour period at the exterior of a residential land use (on campus or in City of Pomona or City of Walnut), or 85 dBA L_{eq} over an 8-hour period at the exterior of a noise-sensitive commercial building (including lodging facilities on campus and hospitals, nursing homes, and lodging facilities off-campus), based on FTA guidance. A significant impact would also occur if construction noise during daytime hours (7:00 a.m. to 7:00 p.m.) exceeds 75 dBA L_{eq} at the exterior of a single-family residential land use located in Los Angeles County. Project construction would be anticipated to be carried out as sequential phases but could have concurrent activities across the proposed Master Plan area.
- **Permanent Noise – Stationary Sources (Threshold 1):** For stationary sound source emission (e.g., heating, ventilating, and air conditioning [HVAC] system noise) attributed to the proposed Master Plan, exceedance of 65 dBA CNEL at a sensitive receptor located on the Cal Poly Pomona main campus or within the City of Pomona would be considered significant. Where the source of new stationary noise is expected to be continuous or steady-state in character, such as air conditioning operating 24-hours a day to keep building occupants comfortable, the corresponding hourly L_{eq} would need to be 6.7 dBA less (i.e., 58.3 dBA) to account for the evening and nighttime dB penalties that are part of the CNEL value derivation. In addition, stationary sound source emission noise attributed to the proposed Master Plan exceeding 50 dBA L_{eq} daytime or 45 dBA L_{eq} nighttime at the exterior of a single-family residential land use located in the City of Walnut or Los Angeles County would be considered significant.
- **Permanent Noise – Mobile Sources (Threshold 1):** For project-attributed increases to local roadway traffic volumes, a significant permanent increase to the outdoor sound environment (either described with CNEL or L_{dn}) would be defined as an increase of 5 dBA or greater, where existing noise levels are below 60 dBA CNEL, or 3 dBA where exterior noise levels would already exceed 65 dBA CNEL (an outdoor noise level considered "normally acceptable"); or, if as a result of the proposed Master Plan increase in roadway noise, the predicted with-project noise level exceeds 65 dBA CNEL. An increase of 3 dBA is perceived by the average healthy human ear as barely perceptible.
- **Vibration (Threshold 2):** Due to a lack of quantified vibration level regulation or policy guidance within the City of Pomona or City of Walnut, this impact analysis will apply to buildings and occupants on campus or in adjacent areas of Pomona or Walnut, FTA and Caltrans guidance of 0.2 ips PPV as both an annoyance-based criterion for occupants of inhabited buildings and a risk level for minor cosmetic damage to typical

residential buildings featuring non-engineered timber and masonry (Caltrans 2020b). For multistory modern reinforced-concrete buildings, however, the risk threshold for potential damage would be less stringent—on the order of 0.5 ips PPV. For off-campus residences located in Los Angeles County, an annoyance threshold of 0.1 ips PPV will be used, while the damage threshold of 0.2 ips PPV will be applied to assess potential structural damage.

4.13.3.2 Methodology

The noise and vibration impact analysis in this section includes a program-level analysis under CEQA of the proposed Master Plan, as well as project-level analysis of the near-term projects that would be implemented under the proposed Master Plan, as described in Chapter 3, Project Description. Both construction and operation of the proposed Master Plan are considered in the impact analysis, where relevant. Where significant impacts are anticipated even with incorporation of applicable regulations, mitigation measures are identified to reduce impacts to less than significant.

As described in Section 4.13.1.5, Existing Noise Environment, ambient outdoor sound level measurements were conducted to quantify the existing daytime noise environment at 16 locations (see Table 4.13-2 and Figure 4.13-3) that primarily represent potential sensitive receivers (i.e., noise-sensitive land uses, as defined in Section 4.13.1.5), on the campus or in the adjacent community. The sound measurement locations, which were used for assessing noise impacts in this analysis, represent the following: 1) existing on-campus and off-campus noise-sensitive receivers that would be potentially affected by implementation (i.e., construction and operation) of proposed Master Plan development projects, and 2) roadway segments on which Master Plan implementation would increase trips. Existing daily traffic volumes for roadways on which the proposed Master Plan would increase trips were taken from Appendix F.

Construction Noise

Master Plan Implementation (All Planned Projects Beyond Near Term)

To evaluate potential noise impacts from construction activities associated with long-term implementation of the proposed Master Plan, six typical construction phases were studied, with normally anticipated equipment for each comparable to CalEEMod default inputs (i.e., for analyzing Air Quality impacts) and reference equipment noise levels from industry-accepted FHWA sources. Using an Excel-based prediction model that emulates the FHWA Roadway Construction Noise Model,[1] significant impact screening distances for each phase were estimated to show where future long-range development implemented under the proposed Master Plan would be sufficiently proximate to existing noise-sensitive receptors to cause a significant impact and need for noise and/or vibration mitigation.

Near-Term Project Implementation

Nine near-term projects identified in Chapter 3, Project Description (Table 3-2), involve interior renovations within existing buildings, and five involve infrastructure upgrades (traffic circulation improvements and water system improvements). These projects would employ a very limited set of construction equipment to be used outdoors; with the limited use of equipment, the potential for significant construction noise impacts affecting on-campus receivers would be minimal, and these impacts are evaluated with simple standard equations based on a few

[1] Although the Roadway Construction Noise Model was promulgated by the FHWA, it is often used for non-roadway projects because the same types of construction equipment used for roadway projects are often used for other types of construction.

equipment pieces. Because of greater separation distances between these limited intensity construction projects and the closest off-campus sensitive receivers, there would not be the potential for significant construction noise impacts affecting off-campus receivers associated with these limited intensity construction efforts. The only major near-term projects involve demolition of the Art Department/Engineering Annex Building (Building 13), and construction of a new Engineering Graduate Building (Building 14); a detailed construction noise evaluation employing the same Excel-based prediction model as described above was completed to address demolition of the Art Department/Engineering Annex Building, and construction of a new Engineering Graduate Building.

Separation distances between near-term projects and the closest sensitive receivers were identified for the evaluation of construction-related noise levels at sensitive receivers on campus. The separation distances used for construction noise evaluation at on-campus sensitive receivers are described below.

University Library (Building 15)

The University Library is situated at the southern edge of the campus core (see Figure 4.13-2), adjacent to the south side of the Engineering Annex. Demolition of the Engineering Annex and construction of the Graduate Engineering Building would occur within approximately 75 feet from the University Library. Planned interior renovations of buildings included in near-term projects would be no closer than approximately 200 feet from the University Library.

Manor House (Building 111)

The official residence of the Cal Poly Pomona President, Manor House, sits just north of the campus core (see Figure 4.13-2). Planned interior renovations of buildings included in near-term projects would be no closer than approximately 225 feet from Manor House. Demolition of the Art Department/Engineering Annex Building and construction of the Graduate Engineering Building would occur no closer than approximately 800 feet from Manor House.

Kellogg West Lodge (Buildings 76, 76A. 77 and 78)

Kellogg West Conference Center and Hotel are located just south and west of the campus core. Kellogg West Lodge itself is planned to undergo interior renovations as part of the near-term projects; planned interior renovations of other buildings would be no closer than approximately 200 feet from Kellogg West Lodge. Demolition of the Art Department/Engineering Annex Building and construction of the Graduate Engineering Building would occur no closer than approximately 1,100 feet from Kellogg West Lodge; there are also several intervening buildings between Kellogg West Lodge and the engineering buildings demolition/construction area.

Residence Halls (Buildings 54, 60, 61. 62. 63, 73, and 74)

Residence halls are generally clustered near the center of main campus, southeast of the campus core and northwest of the baseball and football stadiums. The planned interior improvements of several gymnasiums would occur within approximately 50 feet of the closest residence halls. Demolition of the Art Department/Engineering Annex Building and construction of the Graduate Engineering Building would occur no closer than approximately 1,000 feet from the closest residence hall.

University Village (Building 200)

Student housing in the form of apartment buildings is clustered within University Village, located in south campus between mobile home communities on the southwest and Temple Drive and Innovation Village research park on

the northeast. The closest project on the near-term project list is a parking lot improvement no closer than approximately 575 feet from University Village. Demolition of the Art Department/Engineering Annex Building and construction of the Graduate Engineering Building would occur no closer than approximately 3,400 feet from University Village; there are also multiple intervening buildings between University Village and the engineering buildings demolition/construction area.

International Polytechnic High School (I-Poly) (Building 85)

I-Poly is located along the southern border of the main campus, on the north side of the intersection of West Temple Avenue and South Campus Drive. The high school facility includes a surface parking lot, and interconnected buildings providing interior space for education and administration functions. The athletic program for the high school is allowed to use the adjacent Cal Poly Pomona sports facilities; separate outdoor athletic facilities are not located within the high school campus. Classroom buildings are typically not considered a noise-sensitive receiver; however, since a library (an exceptionally noise-sensitive use) is assumed to be housed in the high school buildings, the high school buildings are conservatively treated as a noise-sensitive receiver. The closest near-term project is the Bronco Mobility Hub (Building 133) no closer than approximately 635 feet from the nearest classroom building at the high school. Demolition of the Art Department/Engineering Annex Building and construction of the Graduate Engineering Building would occur no closer than approximately 2,400 feet from the nearest classroom building at the high school; there are also multiple intervening buildings between the high school and the engineering buildings demolition /construction area.

Roadway Traffic Noise

Master Plan Implementation (All Planned Projects)

As appropriate, the collected existing outdoor ambient sound level data at selected ambient noise measurement locations (see notations in Table 4.13-2) were used to validate the predictive modeling of roadway traffic noise along each of the studied roadway segments (see Figure 4.13-4). With the traffic noise model thus calibrated, Existing (2024) and Future with Project Buildout (2040) traffic noise levels were modeled using average daily trip data for these two scenarios. This noise analysis uses Excel-based spreadsheets emulating the algorithms from the FHWA Traffic Noise Model (version 2.5) to estimate these existing and future roadway traffic noise levels for the studied roadway segments.

Mechanical Noise

Master Plan Implementation (All Planned Projects Beyond Near Term)

In addition to acoustical contributions due to changes in area roadway traffic, the proposed Master Plan has the potential to change the campus outdoor ambient sound environment due to the creation of new stationary sources of noise, such as anticipated rooftop HVAC systems and other electro-mechanical or fluid-handling equipment that tend to operate continuously and would be exposed to the outdoors. This category of potential stationary noise emitters would also include intermittent operation of standby generators that require regular testing to help ensure operation during actual emergencies. Without information on site-specific development projects (and their component noise-producing mechanical systems) that may be implemented with the proposed Master Plan, assessment of stationary source noise can be done qualitatively to determine conditions under which detailed quantitative analyses of HVAC noise (and refinement of noise-reducing design features) would be needed. The more detailed analysis of the HVAC equipment for the proposed Engineering Graduate Building (Building 14) (described

below) is used as a representative example in the qualitative discussion of long-term future development projects operational noise.

Near-Term Project Implementation

Nine near-term projects identified in Chapter 3, Project Description (see Table 3-2), involve the interior renovation of existing buildings; it is assumed that replacement HVAC equipment for the renovated buildings would have no substantially different noise-generating characteristics as compared to existing systems, and therefore these buildings are not analyzed for new operational noise. Three other near-term projects consist of roadway infrastructure upgrades (including Bronco Mobility Hub [Building 133], Kellogg Drive and East Campus Drive Roadway Reconfiguration, and the Campus Loop Improvements and Pedestrian Malls), which would not involve noise-generating elements. While some of the Kellogg Drive Improvements could shift on-campus traffic patterns, the magnitude of traffic increases on certain roadway segments would not be anticipated to lead to noticeable traffic noise level changes (a doubling of traffic trips would be needed for there to be a noticeable change). The new Lower Reservoir Tank Replacement (Building 144) and Well Water and Water Treatment Plant Expansion (Building 27) would involve new mechanical equipment, noise from which is discussed qualitatively. The estimates of stationary noise emission attributed to the new Engineering Graduate Building (Building 14) are calculated using an Excel-based model that relies on input parameters that include building gross square footage, interior space usage or function, and the proximity of sensitive receptors to expected major HVAC equipment noise producers (e.g., air-handling unit fans).

Vibration

Master Plan Implementation (All Planned Projects)

Vibration from construction activities is of the greatest concern relative to assessment of proposed new development projects. Caltrans has assembled vibration generation data for the most common heavy equipment used in construction and also identifies a calculation to determine vibration levels at various distances between construction equipment and potential nearby structures/receivers. Using the Caltrans construction equipment vibration data and attenuation equation, the distance from construction equipment to the vibration level significance threshold of 0.2 ips PPV was determined. The distance to the Los Angeles County annoyance threshold of 0.1 ips PPV was also determined for off-campus receptors in the County. Operational vibration potential was not quantitatively assessed as academic buildings and residential dormitories do not include sources of substantial vibration generation.

4.13.4 Impact Analysis

4.13.4.1 Issues Not Further Evaluated

The proposed Master Plan would have no impact with respect to the following threshold of significance and therefore this topic is not further evaluated:

- **Airport Noise.** Threshold C addresses the potential for exposure of people residing or working in the proposed Master Plan area to excessive noise from airports or private airfields in the vicinity. Two airports exist in the subregion containing Cal Poly Pomona; Brackett Airfield is located approximately 2.25 miles to the northeast, while Ontario International Airport is located approximately 10 miles due east. Noise contour figures from the 2015 *Brackett Airfield Airport Land Use Compatibility Plan* (Los Angeles County Airport

Land Use Commission 2015) show that the Cal Poly Pomona main campus is outside the 55 - 60 dBA CNEL aviation noise contour. Similarly, noise contour figures from the *Ontario International Airport Land Use Compatibility Plan July 2018 Amendment* (Ontario City Council 2018) show that the Cal Poly Pomona main campus is well outside the 60 - 65 dBA CNEL aviation noise contour. Consequently, airport operations and aircraft activities associated with Bracket Airfield and Ontario International Airport do not have the potential to expose Cal Poly Pomona students or employees to excessive noise levels. Therefore, the proposed Master Plan would have no impact on related to airport noise.

4.13.4.2 Project Impacts

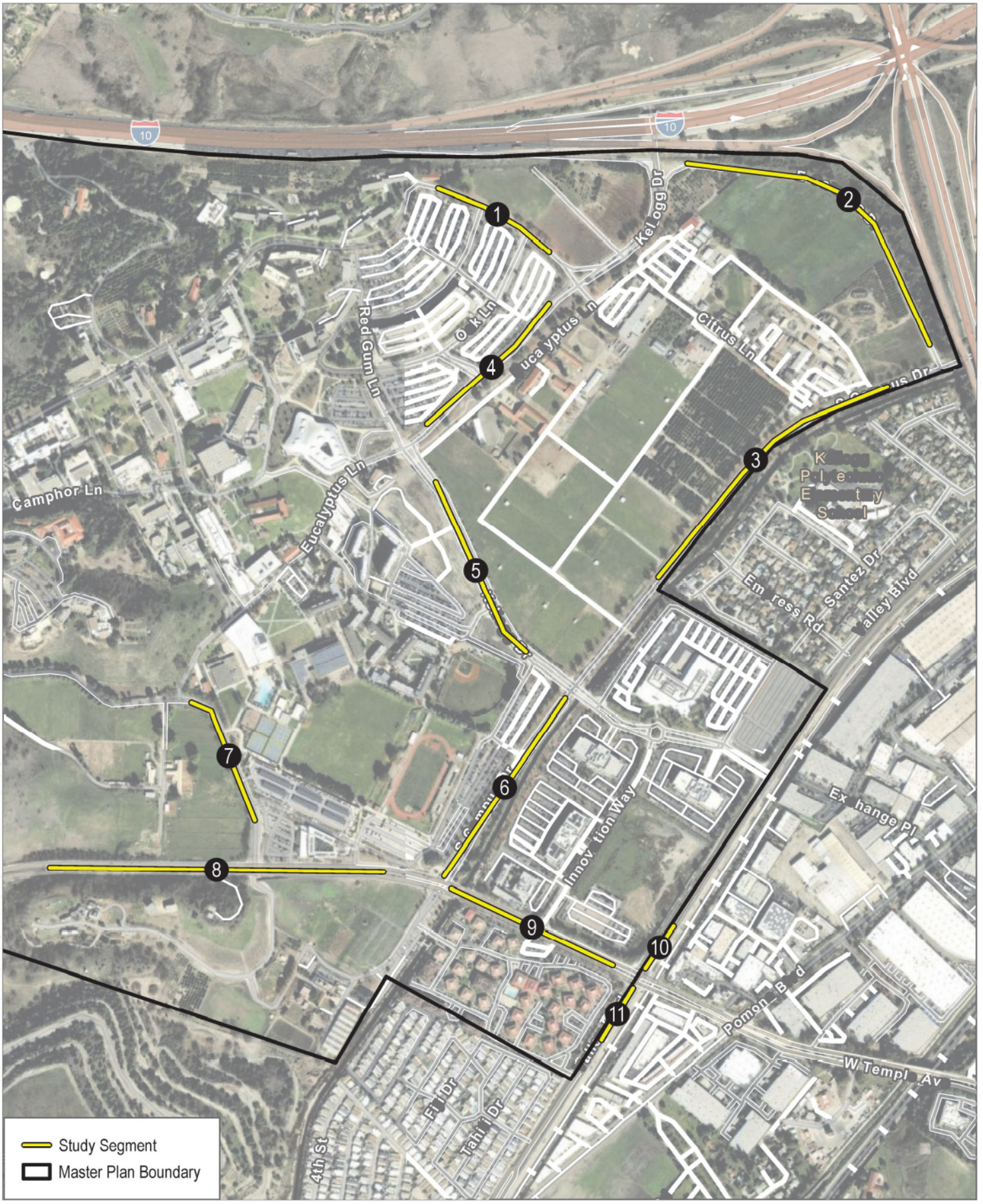
Impact 4.13-1 **The project could result in generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; however, the project would not result in a substantial permanent increase in ambient noise levels. (Potentially Significant)**

Program-Level Analysis for Master Plan (All Planned Projects Beyond Near Term)

Temporary Construction Noise

The construction of new facilities on the main campus under implementation of the proposed Master Plan would result in construction noise. Construction of proposed Master Plan facilities would temporarily generate noise that could expose nearby receivers to elevated noise levels that may disrupt communication and routine activities. The magnitude of the impact would depend on the type of construction activity, equipment, duration of the construction, distance between the noise source and receiver, and intervening structures.

Construction equipment would vary day-to-day depending on the phase of construction and the activities occurring. Typical construction activities would include grubbing/clearing of on-site areas, excavation, and relocation of soil/rock on the site, backfilling and compaction of soils, construction of utilities (i.e., potable and non-potable water conveyance, wastewater conveyance, stormwater drainage facilities, and electrical and natural gas infrastructure), and construction of proposed buildings. Equipment that would be in use during construction would include, in part, graders, backhoes, rubber-tired dozers, loaders, cranes, forklifts, cement mixers, pavers, rollers, and air compressors. Typical noise levels generated by various types of construction equipment likely to be used are identified in Table 4.13-8.



SOURCE: World Imagery; Fehr & Peers

FIGURE 4.13-4

Traffic Noise Roadway Study Segments

Cal Poly Pomona Campus Master Plan EIR

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Table 4.13-8. Typical Construction Equipment Maximum Noise Levels

Equipment Type	Typical Equipment Noise Level (L_{max}, dBA at 50 feet)
All Other Equipment > 5 HP	85
Backhoe	78
Compressor (Air)	78
Concrete Mixer Truck	79
Concrete Saw	90
Crane	81
Dozer	82
Front-End Loader	79
Generator	72
Grader	85
Man Lift	75
Paver	77
Roller	80
Scraper	84
Slurry Trenching Machine	80
Tractor	84
Welder / Torch	73

Source: D0T 2006
Note: L_{max} = maximum sound level; dBA = A-weighted decibels

Maximum noise levels at a reference distance of 50 feet tend not to exceed 85 dBA L_{max} for common equipment and vehicles anticipated for this kind of academic, residential and mixed-use development on a college campus. Exceptions typically include impact-type equipment, concrete saws, drills and other processes where the noise generated is not merely due to engine or motor performance, but from the forceful and/or rapid contact of the equipment tool on the worked material. Hourly L_{eq} values at this reference distance, however, would vary depending on duty cycle. For instance, an air compressor at a stationary position on a construction site may operate continuously, but the pneumatic hammer it is powering may only be active and performing work for a fraction of a given hour during a typical work-shift.

Construction noise in a well-defined area typically attenuates at approximately 6 dB per doubling of distance, as each piece of equipment can be approximated as an individual point-type source. Alternately, a set of equipment in proximity to one another could be considered geographically a common point source; or, on average with respect to time, a set of operating equipment with uncertain positions within a defined area could be considered a common point source.

The geographical common-point consideration is comparable to the FTA "general assessment" guidance for evaluating construction noise at a sensitive receiver near a construction site when the specific locations of individual operating equipment are unknown. The technique assumes noise from the two loudest pieces of equipment (operating at full power and thus exhibiting L_{max} corresponding with the comparable equipment types and values shown in Table 4.13-8) on a construction site will be dominant, and that the acoustic combination can be treated as a single point source from which sound would propagate toward the off-site receptor of interest. Emulating this FTA-based "two-loudest" method, Table 4.13-9 presents the source-to-receiver distances, for each of five construction phases, within which predicted noise from construction site activity would likely exceed the 8-

hour L_{eq} FTA-based thresholds at the exteriors of residential and nonresidential commercial (i.e., lodging uses) receivers. The FTA-based thresholds are applied to on-campus receivers as well as to adjacent residential and commercial (i.e., hospital, nursing homes, and lodging facility) receivers in the City of Pomona and Walnut.

Table 4.13-9. Predicted Construction Noise Impact Screening Distances for Cal Poly Pomona Master Plan Projects

Typical Construction Phase	Anticipated Two Loudest Noise-Producing Equipment[1]	Distance (feet) to Residential Receiver[2,3]	Distance (feet) to Commercial (lodging, hospital, nursing home) Receiver[2,4]
Demolition	concrete saw, dozer	175	100
Site Preparation	grader, scraper	125	70
Grading	grader, tractor	125	70
Building Construction	crane, tractor	100	55
Paving	roller, tractor	100	55
Architectural Finishes	air compressor (2)	60	35

Notes:

1 Assumes two pieces of equipment operating at full power (L_{max}) all eight hours; noise from other phase equipment neglected.

2 Assumes the distance is between the construction site acoustical centroid (AC) and the receptor exterior façade.

3 Federal Transit Administration (FTA) guidance threshold for construction noise received by Residential land use is 80 dBA 8-hour equivalent sound level (L_{eq}).

4 FTA guidance threshold for construction noise received by Commercial land use is 85 dBA 8-hour L_{eq}.

Construction projects carried out within the Cal Poly Pomona main campus would not have the potential to result in significant construction noise impacts to Los Angeles County residences, as there are no residences in the County located closer than approximately 2,000 feet from future construction zones and the applicable 75 dBA daytime limit that applies in the County would not be exceeded at this distance. This is consistent with the lack of identified sensitive receivers in the unincorporated Los Angeles County area extending westward from the main campus along the south side of I-10 (see Figure 4.13-1).

Similarly, future campus construction activities would not be anticipated to occur within 175 feet of existing sensitive receivers in the San Dimas Avenue or Camino del Sur neighborhoods (900 and 550 feet north of the Master Plan boundary, respectively, within the City of San Dimas), E. Fort Bowie Drive neighborhood (235 feet west of the Master Plan boundary, in the City of Walnut), or sensitive receivers in the City of Pomona consisting of the Pomona Islander or Walnut Hills Mobile Home Communities (700 feet southwest of the Master Plan boundary), Kellogg Park neighborhood, or the Kellogg Polytechnic Elementary School (approximately 1,200 feet from the Arabian Horse Center Renovation and Event Center (Building 29), the closest proposed Master Plan development), and therefore construction noise levels at these sensitive receivers would not be expected to exceed the FTA threshold.

However, construction activity and associated temporary noise levels from implementation of the proposed Master Plan (i.e., all planned projects beyond the near-term projects) within the indicated distances shown in Table 4.13-8 could exceed the FTA construction noise thresholds for on-campus sensitive receivers including the University Library (Building 15) and residence halls (Buildings 54, 60, 61. 62. 63, 73, and 74). Impacts at these sensitive receivers would therefore be **potentially significant**.

Implementation of MM-NOI-1 (Construction Noise Measures) would avoid substantial temporary increases in ambient noise levels during construction of buildings and infrastructure improvements of the project by: limiting

construction noise to the less sensitive times of day; properly maintaining all construction equipment; ensuring all equipment is properly equipped with noise-reducing air intakes, exhaust mufflers, and engine shrouds; using electrical power to run power tools and to power temporary structures; siting all stationary construction equipment and staging areas as far away as feasible from residences and educational land uses; and implementing special procedures when construction activities are expected to occur less than 175 feet from existing residences. With the implementation of MM-NOI-1 the construction noise impact of the proposed Master Plan would be reduced to **less than significant**. (See Section 4.13.5, Mitigation Measures, for the full text of this mitigation measure.)

Permanent Noise

Roadway Noise. To assess the proposed Master Plan's potential operational impacts relative to vehicle traffic noise, a roadway noise analysis was conducted to establish baseline conditions and quantify the potential increases in roadway noise resulting from implementation of the proposed Master Plan. Roadway noise levels were predicted with the FHWA Traffic Noise Model, using inputs based on traffic projections provided in Appendix F. The roadway segments are illustrated on Figure 4.13-2.

The roadway segments illustrated in Figure 4.13-2 and identified in Table 4.13-9 represent the major thoroughfares in and around the Cal Poly Pomona main campus where the highest project-attributed roadway noise level increases were anticipated on the basis of predicted increase in future traffic volumes. Roadway intersections and segments further from the Cal Poly Pomona main campus (where all the proposed Master Plan's capital improvements would be located) would be expected to experience less project-related traffic increases and thus correspondingly less likelihood of potential impact due to project-related roadway noise increases.

Consistent with Section 4.17, Transportation, noise levels were modeled for two scenarios: Existing (2024) and Future with Project Buildout (2040). The results of the noise modeling predictions are shown on Table 4.13-9, which lists the following for each of the 11 representative roadway segments: the represented roadway segment, the existing conditions roadway noise level (using the CNEL descriptor), and future with proposed Master Plan buildout conditions roadway noise, and the arithmetic difference between the two estimated noise levels. Note that for the existing conditions (i.e., without contribution from the proposed Master Plan) predicted levels have been validated with the field-collected data presented in Table 4.13-2.

The predicted CNEL values shown in Table 4.13-9 are considered conservative estimates because they do not account for acoustical shielding from existing buildings or the noise-reducing effects of path-intervening terrain. Compared to existing conditions, predicted roadway noise levels in and around the Cal Poly Pomona main campus were estimated to increase by up to 0.8 dBA CNEL.

As described in Section 4.13.3.1, Thresholds of Significance, an increase in ambient noise levels of 3 dBA CNEL or more attributable to the proposed Master Plan would be considered a significant impact only when the existing or future outdoor ambient sound level already exceeds 65 dBA CNEL; or, if as a result of the proposed Master Plan increase in roadway noise, the predicted with-project noise level exceeds 65 dBA CNEL. An exterior sound level of 65 dBA CNEL is considered "normally acceptable" for high-density residential use such as existing student residences on campus and campus student housing proposed as part of implementation of the proposed Master Plan.

As reported in Table 4.13-10, proposed Master Plan traffic would result in a maximum increase of 0.8 dBA CNEL along any studied roadway segment. As stated in Section 4.13.1.2, Acoustic Fundamentals, a change in average outdoor noise levels of less than 3 dBA is usually considered not discernible to the general population, a change of less than one dBA is not discernible to the human ear even in a laboratory setting. Therefore, proposed Master Plan

traffic would not result in a noise increase discernible to humans along any studied roadway segment. However, the proposed Master Plan would marginally increase the existing roadway noise level to greater than 65 dBA CNEL along one segment (segment 9, West Temple Avenue east of South Campus Drive); the resulting noise level would increase from just below 65 dBA (64.8 dBA) to 65.5 dBA, which would exceed the 65 dBA CNEL limit for residential land uses in Pomona. However, this traffic noise impact along roadway Segment 9 was pre-mitigated at the time of construction of University Village student housing with installation of a solid 6-foot concrete block wall along the West Temple Avenue frontage of the University Village property. The wall achieves a minimum of 5 dBA reduction for receivers in University Village, lowering exposure below the 65 dBA CNEL limit for residential land uses in Pomona. University Village is the only residential land use or noise-sensitive receiver along roadway Segment 9. No further mitigation would be necessary for this traffic noise impact. Therefore, the impact of the proposed Master Plan related to roadway noise would be **less than significant**.

Table 4.13-10. Roadway Traffic Noise Analysis Results (CNEL)

Segment ID	Description of Segment	Existing Noise Level 2024 (CNEL dBA)	Proposed Master Plan Buildout Noise Level 2040 (CNEL dBA)	Increase (CNEL dBA)	Significant Impact?
1	University Drive West of Kellogg Drive	59.4	60.1	0.7	NO
2	East Campus Drive east of Kellogg Drive	55.0	55.7	0.7	NO
3	South Campus Drive north of Kellogg Drive	61.0	61.7	0.7	NO
4	Kellogg Drive between Red Gum Lane and University Drive	63.3	64.0	0.7	NO
5	Kellogg Drive between Eucalyptus Lane and South Campus Drive	63.9	64.6	0.7	NO
6	South Campus Drive south of Kellogg Drive	62.2	62.9	0.7	NO
7	South University Drive north of West Temple Avenue	56.3	57.0	0.7	NO
8	West Temple Avenue west of South Campus Drive	63.7	64.4	0.7	NO
9	West Temple Avenue east of South Campus Drive	64.8	65.5	0.7	NO[a]
10	Valley Boulevard east of West Temple Avenue	61.7	62.5	0.8	NO
11	Valley Boulevard west of West Temple Avenue	63.7	64.4	0.7	NO

Source: Dudek, Appendix E.
Notes: CNEL = Community Noise Equivalent Level; dBA = A-weighted decibels.
[a] The proposed Master Plan contribution would be less than 1 dBA and therefore would not result in a perceptible change in traffic noise. The traffic noise modeling does not account for the presence of an existing 6-foot soundwall along the West Temple Avenue frontage of University Village, the only noise-sensitive receiver along Segment 9. The existing wall would reduce Proposed Master Plan Buildout Noise Level 2040 exposure for University Village receivers to below 65 dBA CNEL; therefore a significant impact would not occur.

Mechanical Equipment Noise. Mechanical equipment associated with the operation of new campus facilities could include HVAC equipment, back-up generators, and various fans, pumps, and compressors that often can be significant noise sources. Emergency/back-up generators would be used for continued periods of time during power outages or building equipment malfunctions and, therefore, do not substantially contribute to increases in average ambient noise levels. Further, back-up equipment would be tested periodically for short periods of time during the daytime hours, consistent with typical work shifts of maintenance personnel. Therefore, due to the infrequent, intermittent, and temporary use characteristics of these noise sources, in combination with the fact that typical maintenance activity would occur during the less sensitive times of the day, noise generated from new emergency/back-up generators would not be considered a substantial permanent increase in noise that could disturb nearby receptors.

The loudest sources of continuous noise from a building are typically the operation of HVAC systems and other electro-mechanical equipment, which emit sound levels that can exceed noise thresholds and thus create a noise impact when located in sufficient proximity to noise-sensitive receptors such as residences, campus housing, classrooms, or the library, if not properly designed. Anticipated new on-site stationary operating mechanical equipment associated with future buildings under the proposed Master Plan are typical major producers of relatively continuous or "steady-state" outdoor noise that include rooftop air-handling units that supply air conditioning to occupied structures, and exhaust fans for new laboratories or parking structures having subsurface levels.

Although project-level design details are not known at this time, the air-handling units and other equipment featuring fans would possibly be located on the top of proposed buildings and surrounded by rooftop parapet walls or be otherwise partially enclosed (or fully enclosed, such as a basement or penthouse dedicated for housing central HVAC systems); thus, it is unlikely that most noise-sensitive receivers would have a direct view of such equipment. Based upon a detailed assessment of HVAC noise for the Engineering Graduate Building (discussed below in the near-term project analysis), it appears unlikely that HVAC systems for even larger buildings would result in noise levels at nearby uses that exceed the threshold of 65 dBA CNEL (58 dBA $L_{eq\ hr}$). Therefore, the noise impact associated with permanent mechanical noise sources for proposed Master Plan development projects would be **less than significant**.

Athletic and Event Facilities. Proposed Master Plan development projects in this category include expansion of the Arabian Horse Center Renovation and Event Center (Building 29), Soccer Field and Kellogg Stadium Replacement (Project C), Recreational Fields and Support Facilities (Project B), and construction of a new Softball Facility (Project A). Activities at these facilities would primarily occur outdoors, with the potential to generate noise levels audible in the surrounding area.

The closest noise-sensitive receivers to the Arabian Horse Center Renovation and Event Center are Secoya residence hall (Building 74) at approximately 900 feet and the Kellogg Park residential neighborhood at approximately 1,500 feet (see Figures 4.13-1 and 4.12-2). Equestrian events do not typically involve cheering by spectators, but even assuming typical crowd noise for a sporting event, a group of up to 200 spectators would generate an anticipated noise level of approximately 91 dBA L_{eq} at 1 meter, or 3.28 feet (Hayne 2011). If a sound amplification system were used for announcing results, sound levels could reach up to 96 dBA L_{eq} at 3.28 feet (a sound level 5 dBA greater than the crowd noise ensures the announcements can be heard). At 900 feet (the distance from the Horse Center to the closest residence hall), noise levels from the above example event would attenuate to approximately 46 dBA L_{eq}, compared to a measured daytime ambient level of 51 dBA L_{eq}. At 1,500 feet (the distance from the Horse Center to the Kellogg Park residences), noise levels from the above example event would attenuate to approximately 42 dBA L_{eq}, compared to a measured daytime ambient level of 66 dBA. Arabian Horse Center Renovation and Event Center event noise levels would therefore remain below the ambient noise

levels at these sensitive receivers. Therefore, noise impacts associated with the Arabian Horse Center Renovation and Event Center would be **less than significant.**

Residence halls (Buildings 60, 61, 62 and 63) are within 50 to 500 feet of the Soccer Field and Kellogg Stadium Replacement and are within 150 to 600 feet from the proposed Softball Facility. Based upon even a modest 200 spectator crowd, sporting event noise at 50 feet (representing the closest residence hall to the recreation fields or soccer stadium) could reach up to 72 dBA L_{eq} and at 150 feet (representing the closest residence hall to the Softball Facility) could reach up to 62 dBA L_{eq}. Noise from these athletic facilities could be up to 21 dBA L_{eq} greater than the measured daytime ambient level at these residences halls; with a 10 dB increase perceived as twice as loud (reasonably representing a "substantial" increase). A 21 dBA increase would exceed the substantial increase threshold, and therefore the impact would be **potentially significant.**

Implementation of MM-NOI-2 (Athletic Facilities Noise Measures) would avoid substantial increases in ambient noise levels during the hosting of large competitive matches (i.e., events involving more than 200 participants and spectators) at the Soccer Field and Kellogg Stadium Replacement, Softball Facility, and Recreational Fields and Support Facilities by: incorporating facility design components to shield noise propagation, ensuring loudspeakers are oriented properly to face away from adjacent noise-sensitive receivers, employing noise barriers at the perimeter of the facility boundary as appropriate, and/or other methods and procedures identified as necessary in a facility-specific noise assessment to avoid a substantial increase over ambient noise levels at the residence halls. With the implementation of MM-NOI-2 the noise impacts of new or replacement athletic facilities under the proposed Master Plan would be reduced to **less than significant**. (See Section 4.13.5, Mitigation Measures, for the full text of this mitigation measure.)

Project-Level Analysis for Near-Term Projects

Temporary Construction Noise

As discussed in 4.13.3.2, Methodology, most of the near-term development components would not involve substantial construction equipment operating outdoors. Interior building renovations would be expected to employ equipment primarily indoors, minimizing construction noise outdoors. For most near-term projects, and for infrastructure improvements, equipment operating outdoors would likely be limited to a backhoe and dump truck or flatbed truck and forklift. A backhoe and dump truck operating together would have a combined average noise level of 74 dBA L_{eq} at 65 feet. Separation distance between construction activities and the closest receptors would not be less than 65 feet, which would result in noise levels of 74 dBA L_{eq} or less and would not exceed the temporary construction noise limits. As a result, construction associated with most of the near-term projects would not be anticipated to result in significant temporary noise impacts on any of the identified sensitive receivers.

However, demolition of the Art Department/Engineering Annex Building (Building 13) and construction of the Engineering Graduate Building (Building 14), two of the near-term projects, would require more extensive construction activities. A construction equipment list by construction phase was developed based upon CalEEMod for the size and type of structure. As described in Section 4.13.3.2, Methodology, based on this construction list, construction noise levels were predicted using an Excel-based prediction model that emulates the FHWA Roadway Construction Noise Model. The distances to construction noise receivers assessed in the construction noise model include the adjacent existing engineering buildings (Buildings 9 and 17 [represented as R1 in the construction noise model] at a distance of 75 feet, the Library Building (Building 15 [R2 in the model] at a distance of 165 feet), the closest residence hall on campus (Building 73 [R3 in the model] at a distance of 1,200 feet), and the closest off-site residence in Los Angeles County (R4 at a distance of 5,000 feet, or nearly a mile to the northwest; this receiver

is not included in the identified vicinity noise-sensitive receivers, due to the large distance from campus). The Los Angeles County receiver is a single-family home accessed by Covina Hills Road, on the north side of I-10; it is included for comparison of construction noise levels against the Los Angeles County limit. Buildings 9 and 17 contain classrooms and departmental offices, uses that are not classified as noise sensitive. However, at a distance of only 75 feet from heavy construction equipment operations and major construction activities, exterior noise levels from construction could result in interior noise levels that are disruptive for exams; construction noise exposure level at the Buildings 9 and 17 is therefore included in the assessment, and compared against the FTA commercial building limits to provide a conservative analysis. Table 4.13-11 presents the results of the construction noise modeling for the demolition of the Art Department/Engineering Annex Building and construction of the Engineering Graduate Building.

Table 4.13-11. Predicted Construction Noise Levels for Engineering Graduate Building

	Sensitive Receiver Locations			
Construction Phase	Modeled R1 Blds. 9 and 17 (75 feet) dBA $L_{eq\ 8hr}$	Modeled R2 Bld. 15 (165 feet) dBA $L_{eq\ 8hr}$	Modeled R3 Bld. 73 (1,200 feet) dBA $L_{eq\ 8hr}$	Modeled R4 LA County Residence (5,000 feet) dBA $L_{eq\ 8hr}$
Demolition	81	71	52	35
Site Preparation	78	69	49	32
Grading/Excavation	83	73	53	37
Building Construction	75	65	45	28
Paving	77	67	47	30
Architectural Coating	70	60	41	24

Source: Appendix E

As reported in Table 4.13-10, construction noise levels for the closest buildings (Buildings 9 and 17, adjacent engineering classroom buildings) would remain below the FTA standard for commercial buildings of 85 dBA L_{eq}. Even applying the more conservative residential limit of 80 dBA L_{eq}, construction noise levels at the Library Building (Building 15) and on-campus residence hall (Building 73) would remain well below the threshold. Similarly, construction noise levels at the closest residence in Los Angeles County (R4) would remain no more than approximately 50% of the applicable 75 dBA L_{eq} threshold. Consequently, temporary construction noise impacts associated with the near-term projects would be **less than significant**.

Permanent Noise

Roadway Noise. The analysis of roadway traffic noise for the proposed Master Plan presented above also considers traffic noise from the near-term projects. As indicated above, predicted project-related traffic noise increases along all studied road segments would be considered **less than significant**.

Mechanical Equipment Noise. As discussed in 4.13.3.2, Methodology, nine near-term projects would entail interior renovations to existing buildings, with any replacement mechanical equipment having similar noise generation to the existing equipment. Therefore, operational noise from mechanical equipment associated with most of the near-term projects would not be anticipated to be altered from existing conditions.

The one of the near-term projects with the potential to introduce substantial new mechanical equipment sound sources is the Engineering Graduate Building (Building 14). Using guidance from the American Society of Heating, Refrigerating and Air-Conditioning Engineers, each 360 square feet of the proposed 60,000 square foot building was estimated to require a one-ton capacity HVAC package unit. For the total building, the HVAC packages would need a combined total 167-ton capacity. A Carrier Weathermaker 25-ton model was used as the representative sound source, which has a published sound level rating of 78 dBA at 1 meter (3.28 feet). A total of seven of these 25-ton package units would be needed for the building size. The 60,000 square feet of floor area was assumed to be divided into three equal floors, with a roof deck plane at 36 feet above ground elevation, and with a parapet wall extending up 4 feet from the roof plane.

Using an Excel-based model that incorporates industry-accepted point-source sound propagation algorithms and the estimated reference noise levels due to stationary sources described above, outdoor sound exposure levels were predicted at the nearest noise-sensitive receiver locations to the Engineering Graduate Building site (see Table 4.13-12).

Table 4.13-12. Predicted Mechanical Equipment Operational Noise Levels for Engineering Graduate Building

Receiver Locations			
R1 (Engineering Classroom Buildings 9 and 17) dBA $L_{eq\ hr}$	R2 (Library Bld, 15) dBA $L_{eq\ hr}$	R3 (On-Campus Residence Hall Bld. 73) dBA $L_{eq\ hr}$	R4 (Nearest LA County Residence) dBA $L_{eq\ 8hr}$
38	33	11	1

Source: Appendix E

Under these analysis conditions, the predicted hourly L_{eq} values at the nearest noise-sensitive receiver type (i.e., classroom, library, residence hall, and off-site residence) to the new Engineering Graduate Building would be far below 58 dBA, and would thus result in CNEL values much less than the identified threshold of 65 dBA (on the basis of a continuous sound source having that steady hourly L_{eq} sound level causing the CNEL to be 7 dB greater). Additionally, Table 4.13-11 shows that predicted operational noise levels from the Engineering Graduate Building at the closest Los Angeles County residence would be well below the more stringent nighttime limit of 45 dBA L_{eq} imposed by the County.

Furthermore, Table 4.13-11 demonstrates the anticipated operational noise levels from the new Engineering Graduate Building would be at least 13 dBA L_{eq} below the lowest measured daytime ambient level on the Cal Poly Pomona main campus. Consequently, the operational noise from the new Engineering Graduate Building would not result in an increase in measured exiting ambient noise levels in the project area.

Based on the foregoing discussion, the operational noise level from the new Engineering Graduate Building would not permanently increase ambient noise levels and would not exceed adopted standards. Therefore, the permanent noise impact of the near-term projects would be **less than significant**.

Impact 4.13-2 **The project would not result in generation of excessive groundborne vibration or groundborne noise levels. (Less than Significant)**

Analysis for the Master Plan and Near-Term Projects

Caltrans has been assembling data for vibration levels generated by heavy construction equipment operation during the building of transportation projects for many years. The vibration levels from use of such equipment are representative for other types of construction efforts, not just transportation projects, and are therefore widely employed to assess vibration levels from heavy equipment use for any effort. According to Caltrans (2020b) the most important equipment relative to generation of vibration, and the vibration levels produced by such equipment, is illustrated in Table 4.13-13.

Table 4.13-13. Vibration Velocities for Typical Construction Equipment

Equipment	PPV at 25 Feet (Inches Per Second)
Vibratory Roller	0.210
Large Bulldozer	0.089
Loaded Trucks	0.076
Drill Rig / Auger	0.089
Jackhammer	0.035
Small Bulldozer	0.003

Source: Caltrans 2020b.

The FTA and Caltrans use a human annoyance threshold of 0.2 ips PPV; the FTA also uses 0.2 ips PPV as the threshold for damage to older residential structures. Caltrans uses a structure damage threshold of 0.5 ips PPV for commercial buildings. Los Angeles County uses a human annoyance threshold of 0.1 ips PPV. Using the vibration level value for each of the equipment listed in Table 4.13-12, the distance to the more stringent vibration levels of 0.1 ips PPV (LA) and 0.2 in/sec PPV were determined, using the following formula:

$$\text{Peak particle velocity at distance (d)} = \text{peak particle velocity}(d_{ref}) * (d_{ref}/d)^{1.5}$$

In the above equation, "d" is the distance between the receiver and a vibration source, "d_{ref}" is the reference distance that applies for the indicated vibration magnitude. The calculated distance to a vibration level of 0.1 ips PPV represents the radius from each equipment type within which potentially significant vibration annoyance impacts to residents in Los Angeles County could occur from proposed Master Plan and near-term project construction. The calculated distance to a vibration level of 0.2 ips PPV represents the radius from each equipment type within which potentially significant vibration annoyance impacts (Caltrans/FTA) or residential structural damage (FTA) could occur from proposed Master Plan and near-term project construction. Table 4.13-14 presents the results of applying the above equation to the equipment in Table 4.13-13.

As illustrated in Table 4.13-14, ground borne vibration levels for anticipated construction equipment would attenuate to less than 0.2 in/sec PPV within approximately 26 feet from the equipment. At a distance of 40 feet, ground borne vibration levels for anticipated construction equipment would attenuate to less than 0.1 in/sec PPV.

Table 4.13-14. Distance Radius from Construction Equipment to Vibration Level of 0.1 and 0.2 ips PPV

Equipment	Distance From Equipment Where Vibration Level is Reduced to 0.1 in/sec PPV (Feet)	Distance From Equipment Where Vibration Level is Reduced to 0.2 in/sec PPV (Feet)
Vibratory Roller	40	26
Large Bulldozer	24	15
Loaded Trucks	20	13
Drill Rig / Auger	24	15
Jackhammer	12	8
Small Bulldozer	1.5	2

Source: Caltrans 2020b

A 40-foot radius for any future construction effort on the Cal Poly Pomona main campus would not be expected to extend beyond the campus boundary toward any residences in Los Angeles County. Therefore, construction would not be anticipated to result in significant vibration annoyance for Los Angeles County residents. It is also very unlikely that existing structures on the Cal Poly Pomona main campus would be located closer than 24 feet from the construction boundary for future proposed Master Plan development projects. Consequently, proposed Master Plan and near-term project impacts from construction-related vibration levels and associated vibration annoyance or structural damage would be **less than significant**.

4.13.4.3 Cumulative Impacts

Impact 4.13-3 **The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to noise and vibration. (Less than Significant)**

Temporary Construction Noise and Vibration

Development of one or more off-campus cumulative projects concurrent with implementation of the proposed Master Plan, including near-term development components, would create the potential for a cumulative construction noise and vibration impact only when such sites are sufficiently proximate. Since sound is only energy that attenuates naturally and rapidly with increasing distance traveled from a source, a potentially impacted noise-sensitive receptor would need to be physically near multiple concurrent projects. Therefore, unless construction of cumulative projects occurs at the same time and in close proximity to project development sites (i.e., less than 500 feet), noise and vibration from individual construction projects would not likely combine to create cumulative impacts. For these reasons, cumulative noise and vibration impacts from construction are generally less than significant.

Noise and vibration associated with construction of new buildings and campus facilities associated with the proposed Master Plan would be intermittent, temporary, and would fluctuate over the years as new buildings are constructed and existing buildings are maintained or repaired. Additionally, MM-NOI-1 (Construction Noise Measures) would require that: construction noise be limited to the less sensitive times of day; proper maintenance of construction equipment; all equipment is properly equipped with noise-reducing air intakes, exhaust mufflers, and engine shrouds; electrical power be used to run power tools and to power temporary structures; siting all stationary construction equipment and staging areas as far away as feasible from residences and educational land uses; and implementing special procedures when construction activities are expected to occur less than 175 feet from existing residences.

Given that construction activities associated with the proposed Master Plan would be dispersed throughout the campus and off-campus cumulative projects listed in Chapter 4.0, Environmental Analysis (see Table 4.0-1 and Figure 4.0-1) are not located within 500 feet of the campus, proposed Master Plan construction activities would not combine with construction noise and vibration from other construction activities in the area to result in a substantial increase in cumulative noise and vibration levels. Further, such off-campus cumulative projects would need to comply with municipal or County requirements for controlling construction noise. Given the above, cumulative impacts related to construction noise and vibration are not expected to be significant and the proposed Master Plan would not have a considerable contribution to any potentially significant cumulative construction noise and vibration impact. Therefore, the cumulative impact of the proposed Master Plan related to construction noise and vibration would be **less than significant**.

Permanent Noise

Roadway Noise. The roadway traffic data provided in Appendix F, includes not only proposed Master Plan trip contributions, but also foreseeable contributions from projects in the region. Noise levels modeled for Future Project Buildout 2040 accounted for roadway traffic from cumulative projects. As indicated in Table 4.13-9, roadway traffic noise levels on examined roadway segments would increase by no greater than 0.8 dBA CNEL over existing conditions, which is not a discernible noise level increase and is therefore not considered substantial. Also, even though the predicted 0.7 dBA CNEL increase on Segment 9 would technically result in a noise level over 65 dBA CNEL, the value would round down to 65 dBA. As such, the cumulative impact of the proposed Master Plan related to roadway noise would be **less than significant**.

Mechanical Equipment Noise. Cumulative developments would include stationary equipment associated with building mechanical equipment. However, noise from these sources would be localized and would not combine with noise sources from other related cumulative projects in the area given the likely distance between sources. Further, off-campus cumulative projects would need to comply with municipal or County requirements for controlling stationary noise. Therefore, substantial increases in cumulative noise levels from stationary sources would not be expected and the cumulative noise impact from stationary sources would be **less than significant**.

Athletic Facilities Noise. Proposed Master Plan development projects include new or replacement athletic facilities, that have the potential to increase ambient noise at nearby sensitive receivers. MM-NOI-2 (Athletic Facilities Noise Measures) would require noise assessments for these facilities, and incorporation of measures and controls to prevent substantial increases in ambient noise levels at nearby sensitive receivers. Noise from these athletic facility sources would not combine with noise sources from other cumulative projects in areas surrounding the campus given the likely distance between sources. Therefore, substantial increases in cumulative noise levels from stationary sources would not be expected and the cumulative noise impact from stationary sources would be **less than significant**.

4.13.5 Mitigation Measures

MM-NOI-1: Construction Noise Measures. Cal Poly Pomona shall require that construction contractors implement the following practices and measures:

- Construction activity shall generally be limited to the daytime hours between 7:00 a.m. and 7:00 p.m. on weekdays and between 8:00 a.m. and 8:00 p.m. on weekends and holidays. If nighttime construction is required, noise levels shall not exceed 65 dB L_{max} (slow response)

when measured at the construction site boundary between the hours of 7:00 p.m. and 7:00 a.m. Loud construction activity (e.g., asphalt removal, large-scale grading operations) shall not be scheduled during finals week and preferably will be scheduled during holidays, summer/winter break, etc.

- All construction equipment shall be properly maintained and equipped with noise-reducing air intakes, exhaust mufflers, and engine shrouds in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.
- Electrical power, rather than diesel equipment, shall be used to run compressors and similar power tools and to power any temporary structures, such as construction trailers.
- All stationary construction equipment (e.g., electrical generators, pumps, refrigeration units, and air compressors) and equipment staging areas shall be located as far as feasible from occupied residences or educational land uses.
- When anticipated construction activities are expected to occur less than 175 feet from an existing on-campus or off-campus residential land use, one or more of the following techniques shall be employed to keep noise levels below an eight-hour A-weighted energy-equivalent level (L_{eq8h}) of 80 dBA at the potentially affected sensitive receptors:
  - Reduce construction equipment and vehicle idling and active operation duration.
  - Install or erect on site a temporary, solid noise wall (or acoustical blanket having sufficient mass, such as the incorporation of a mass-loaded vinyl skin or septum) of adequate height and horizontal extent so that it linearly occludes the direct sound path between the noise-producing construction process(es) or equipment and the sensitive receptor(s) of concern.
  - Where impact-type equipment is anticipated on site, apply noise-attenuating shields, shrouds, portable barriers or enclosures, to reduce the magnitudes of generated impulse noises.

MM-NOI-2: Athletic Facilities Noise Measures. Cal Poly Pomona shall require that new or replacement athletic facilities implement the following design measures:

- New or replacement athletic facilities intended to host outdoor athletic events, including but not limited to the Soccer Field and Kellogg Stadium Replacement, Softball Facility, and Recreational Fields and Support Facilities, shall have an operational noise assessment prepared that quantifies noise levels generated by typical and maximum capacity facility events at noise-sensitive receivers within 1,500 feet of the facility. The assessment shall be prepared by an appropriately qualified acoustical consultant, and shall include any sound control design or measures necessary to avoid a substantial increase in ambient noise levels (a greater than 3 dBA CNEL increase) at noise-sensitive receivers within 1,500 feet of these facilities. The following features have been demonstrated to be effective for athletic facility noise reduction, and shall be specified, as warranted, based on the conclusions of the noise assessment.
  1. Incorporate facility design components to shield noise propagation, such as solid walls at the rear of stadium or facility seating.
  2. Ensure loudspeakers are oriented properly to face away from adjacent noise-sensitive receivers.
  3. Incorporate volume limiters in the sound amplification system.
  4. Employ noise barriers at the perimeter of the stadium or facility boundary.

4.13.6 Level of Significance After Mitigation

Implementation of MM-NOI-1 and MM-NOI-2 would reduce all potentially significant impacts of the proposed Master Plan, including near-term projects, to **less than significant**.

4.13.7 References

California State University. 2025. Contract General Conditions for Collaborative Design-Build Major Projects. Revised March 2025.

Caltrans. 2020a. Technical Noise Analysis Protocol for New Highway Construction, Reconstruction, and Retrofit Barrier Projects. California Department of Transportation Division of Environmental Analysis. April 2020.

Caltrans. 2020b. Transportation- and Construction Vibration Guidance Manual. California Department of Transportation Division of Environmental Analysis. April 2020.

City of Pomona. 2014. General Plan Noise and Safety Element

City of Walnut. 2018. General Plan Noise and Safety Element

County of Los Angeles. 2011. General Plan Noise Element

Federal Highway Administration (FHWA). 2006a. Construction Noise Handbook. August 2006.

FHWA. 2006b. Roadway Construction Noise Model, Version 1.1. February, 2006.

FHWA. 2004. Traffic Noise Model, Version 2.5. August 2004

Hayne, M.J., J.C. Taylor, R.H. Rumble, and D.J. Mee. 2011. "Prediction of Noise from Small to Medium Sized Crowds." Paper Number 133, Proceedings of Acoustics 2011. November 2–4, 2011, Gold Coast, Australia.

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4.14 Population and Housing

The following analysis identifies potential impacts related to population growth and housing availability resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing conditions in the proposed Master Plan area, discusses the regulatory setting, evaluates potential impacts to population and housing, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts.

No comments related to population and housing were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are provided in Appendix A.

4.14.1 Environmental Setting

The study area for the evaluation of population and housing impacts includes the Cal Poly Pomona main campus and the Southern California Association of Governments (SCAG) region, which includes Los Angeles, Orange, Riverside, Imperial, San Bernardino, and Ventura Counties, because this region is the basis for growth forecasts and various regional plans that relate to population and housing impacts. The following discussion presents existing conditions and growth rates relevant to the project's proposed horizon year of 2040.

Table 4.14-1 represents SCAG's population and household forecasts for the years between this EIR's environmental baseline (2024) and the horizon year (2040). As demonstrated below, the region and County growth projections are anticipated to increase over the course of the next 15 years.

Table 4.14-1. SCAG Regional Population and Households Forecasts

	2025	2035	2040	Total Change from 2025 to 2040	Percent Change from 2025 to 2040
SCAG Region					
Population	19,068,000	19,946,000	20,346,000	**+1,278,000**	**+6.7%**
Households	6,632,000	7,311,000	7,538,000	**+906,000**	**+13.6%**
Los Angeles County					
Population	10,040,000	10,449,000	10,640,000	**+600,000**	**+5.9%**
Households	3,594,000	3,933,000	4,053,000	**+459,000**	**+12.7%**

Source: SCAG 2024a (Table 12)
Notes: SCAG's projections are rounded to the nearest 1,000, which are based on modeling plus household totals provided by local jurisdictions. The year 2025 was used to demonstrate existing conditions.

4.14.1.1 Population and Population Growth

Regional Population

Cal Poly Pomona's main campus is located partially within the cities of Pomona and Walnut and in unincorporated Los Angeles County and surrounded by the cities San Dimas, Diamond Bar, and Industry. Table 4.14-2 represents existing conditions and population projections for each of the cities surrounding Cal Poly Pomona.

Table 4.14-2. Existing Conditions and Population Projections of Surrounding Cities

		Surrounding Cities				
		Pomona	Walnut	San Dimas	Diamond Bar	Industry
Existing Conditions (2024)						
Total Population [a]	**267,714**	152,166	27,867	33,920	53,335	426
Projections (2045)						
Total Population [b]	**319,000**	187,600	31,300	35,000	64,700	400
Growth (2024 - 2045)						
Total Population	**51,286**	35,434	3,433	1,080	11,365	-26

Sources:
[a] DOF 2024a
[b] SCAG 2020a
Note: Current population projections are not available for 2040; thus, projections for 2045 are used as the next best estimate.

As demonstrated in Table 4.14-2, the cities surrounding Cal Poly Pomona have a total population of 267,714, which is anticipated to increase by 19% between 2024 and 2045.[1]

Current Campus Population

Table 4.14-3 breaks out student enrollment and staff and faculty under existing conditions. During the Fall 2023 academic term, Cal Poly Pomona's total enrollment was 22,847 full-time equivalent students (FTES) and 2,231 full-time equivalent (FTE) faculty and staff members.

Table 4.14-3. Existing Student, Staff, and Faculty Campus Population

	Existing Campus Population (Fall 2023)
Students (FTES)	22,847
Students (Headcount)	26,415
Staff and Faculty (FTE)	2,231
Staff and Faculty (Headcount)	2,762

Source: Cal Poly Pomona, 2024a and 2024b.

Cal Poly Pomona underwent a comprehensive revision to the Master Plan in 2000, which was intended to guide campus development through 2010. Since then, a number of minor and major Master Plan revisions have been approved by the CSU Board of Trustees. The 2000 Master Plan provided a framework for land use, development, open space, and circulation to accommodate projected enrollment of 20,000 FTES on the campus by 2010. Under existing conditions, the campus population exceeds the 2010 projections. As such, the proposed Master Plan is required to update campus conditions, as presented in Chapter 3, Project Description.

Additionally, International Polytechnic High School (I-Poly), which is located in the southern portion of the Cal Poly Pomona main campus, is a specialized, public, college-prep high school that has been in operation since 1993 on the campus (I-Poly 2024) through a ground lease with the University. Approximately 525 students attend I-Poly (LACOE 2024). Planned improvements under the Master Plan include an expansion of I-Poly's

[1] ((319,000 - 267,714) / 267,714) x 100 = 19% (rounded to the nearest whole number)

Multi-Purpose Recreational Center. However, I-Poly's student and faculty population is not anticipated to increase as a result of this change. Therefore, the summary presented in Table 4.14-3 is not inclusive of I-Poly's existing campus population.

4.14.1.2 Housing

Regional Housing

Similar to the discussion above regarding population, Cal Poly Pomona is partially located within as well as surrounded by multiple cities, including the cities of Pomona, Walnut, San Dimas, Diamond Bar, and Industry. Table 4.14-4 represents existing conditions and housing projections for each of these cities.

Table 4.14-4. Existing Conditions and Housing Projections of Surrounding Cities

		Surrounding Cities				
		Pomona	Walnut	San Dimas	Diamond Bar	Industry
Existing Conditions (2024)						
Total Housing Units[a]	**85,848**	44,503	9,283	13,115	18,873	74
Projections (2045)						
Total Housing Units[b]	**96,800**	52,800	9,200	12,300	22,400	100
Growth (2024 - 2045)						
Total Housing Units	**10,952**	8,297	-83	-815	3,527	26

Sources:
[a] DOF 2024a
[b] SCAG 2020a
Note: Current population projections are not available for 2040, thus projections for 2045 are used as the next best estimate. Additionally, although the projections for the Cities of Walnut and San Dimas represent a decrease in housing stock when compared to 2045 conditions, it is important to note that SCAG projects increase in housing stock overtime (SCAG 2020a).[2]

Collectively, the housing stock surrounding Cal Poly Pomona is anticipated to increase. As demonstrated in Table 4.14-4, the cities surrounding Cal Poly Pomona have an existing housing stock of approximately 85,848 housing units, and between 2024 and 2045, these cities are anticipated to increase to a total of 10,952 units in 2045 (13%).[3]

Regional Housing Needs Allocation

As detailed further in Section 4.14.2, Regulatory Setting, the SCAG region is currently within the 6th Regional Housing Needs Allocation (RHNA) cycle, which spans October 2021 to October 2029. RHNA is mandated by the State Housing Law as part of a periodic process of updating local Housing Elements in city and county General Plans. RHNA is produced by SCAG and contains a forecast of housing needs within each jurisdiction within the SCAG region for a period of eight years. The RHNA provides an allocation of the existing and future housing needs by

[2] The cities of Walnut and San Dimas are anticipated to increase in housing stock over time. However, due to differing data sources presented in Table 4.14-4, existing conditions (2024) provided by DOF exceeds SCAG's 2045 projections. When considering other projection years, SCAG's Connect SoCal 2020 anticipates the City of Walnut would increase in housing stock by 500 units between 2016 and 2045 (SCAG 2020a). Similarly, the City of Walnut is anticipated to increase housing stock by 200 units within the same timeframe.
[3] ((96,800 - 85,848) / 85,848) x 100 = 13% (rounded to the nearest whole number)

jurisdiction that represents the jurisdiction's fair share allocation of the projected regional population growth. The future housing needs allocations are broken down by income level so that each jurisdiction is responsible for the development of affordable housing units to meet future housing needs.

SCAG determined the existing regional need for housing was 836,857 units and the regional projected need for 2029 is 504,970 units (SCAG 2020b). As such, the total regional need for 2029 is 1,341,827 units (SCAG 2020b). The total regional need or regional determination of 1,341,827 exceeds SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) household growth forecast of 1,297,000 by 3.46% (SCAG 2020b). SCAG's 6th Cycle RHNA allocation to local jurisdictions is based on the Regional Council-approved Final RHNA Methodology, which is shown in Table 4.14-5. As shown, the cities surrounding Cal Poly Pomona are required to collectively plan for 15,637 housing units by 2029.[4]

Table 4.14-5. SCAG's 6th Cycle Final RHNA Allocation

Total	Very-Low Income	Low Income	Moderate Income	Above Moderate Income
SCAG Region				
1,341,827	351,796	206,807	223,957	559,267
Los Angeles County				
812,060	217,273	123,022	131,381	340,384
City of Pomona				
10,558	2,799	1,339	1,510	4,910
City of Walnut				
1,293	427	225	231	410
City of San Dimas				
1,248	384	220	206	438
City of Diamond Bar				
2,521	844	434	437	806
City of Industry				
17	6	4	2	5

Source: SCAG 2021

Campus Housing

Under existing conditions, campus housing is located throughout the Cal Poly Pomona main campus. There are the Traditional Halls, including the "Reds" (Encinitas Hall [Building 20], Montecito Hall [Building 21], Alamitos Hall [Building 22], and Aliso Hall [Building 23]); and the "Greys" (Palmitas Hall [Building 57] and Cedritos Hall [Building 58]), which are in the north of the main campus. Sicomoro Hall (Building 73) and Secoya Hall (Building 74) are two mid-rise Residential Hall buildings, located in the southern portion of the main campus, east of University Plaza. In addition, the existing Residential Suites (Estrellas [Building 54], Bonita [Building 60], Del Sol [Building 61], Montanas [Building 62], and Luna [Building 63]), are located in the southern portion of the main campus, north of the recreational fields. The University Village Apartments, which are operated by Foundation Enterprises, are located in the southeast portion of the main campus and include apartment style student housing. The Greys are vacant

[4] 10,558 + 1,293 + 1,248 + 2,521 + 17 = 15,637

due to seismic concerns, and are planned for removal under separate environmental review. Currently, there is a total of 4,043 beds[5] on the main campus. Cal Poly Pomona does not maintain any off-campus housing.

4.14.2 Regulatory Setting

4.14.2.1 Federal

There are no federal regulations regarding population or housing that are applicable to the proposed Master Plan.

4.14.2.2 State

California Education Code

The California Education Code contains provisions to ensure that the California State University (CSU) system can accommodate all eligible California resident students. Section 66202.5 of the Education Code states the following:

> The State of California reaffirms its historic commitment to ensure adequate resources to support enrollment growth, within the systemwide academic and individual campus plans to accommodate eligible California freshmen applicants and eligible California Community College transfer students, as specified in Sections 66202 and 66730.
>
> The University of California and the California State University are expected to plan that adequate spaces are available to accommodate all California resident students who are eligible and likely to apply to attend an appropriate place within the system. The State of California likewise reaffirms its historic commitment to ensure that resources are provided to make this expansion possible, and shall commit resources to ensure that students from enrollment categories designated in subdivision (a) of Section 66202 are accommodated in a place within the system.

Section 66011(a) of the California Education Code provides that all resident applicants to California institutions of public higher education, who are determined to be qualified by law or by admission standards established by the respective governing boards, should be admitted to either (1) a district of the California Community Colleges, in accordance with Section 76000; (2) the CSU; or (3) the University of California.

Housing Element Law

California's Housing Element Law (Government Code Sections 65580 through 65589.8) contains the State Housing Element requirements. The law was enacted to ensure that counties and cities recognize their proportionate responsibilities in the attainment of state housing goals, to establish the requirement that all counties and cities adopt Housing Elements as part of their General Plans, to acknowledge that local government should determine how best to contribute to attainment of state housing needs, and to encourage cooperation between local governments to address regional housing needs. Section 65583 states that Housing Elements shall "consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, [and] quantified objectives … for the preservation, improvement, and development of housing" and "shall identify adequate sites for housing, including rental housing … and shall make adequate provision for the existing and projected needs of all economic segments of the community."

[5] The total beds on campus are calculated as the sum of beds from each residence hall currently on campus, excluding the "Greys" which are not currently occupied.

The State of California requires each local jurisdiction to periodically develop a new RHNA to plan for its share of the state's housing need for people of all income levels. The RHNA process is a state mandate designed to address each jurisdiction's "fair share" of the statewide housing need for an eight-year planning period. The RHNA process requires the State Department of Housing and Community Development (HCD) to determine the total housing need for each region in the state, and each region's Council of Governments (e.g., SCAG for Los Angeles County) is then responsible for distributing this need to local governments. Each jurisdiction's Housing Element must include a strategy to meet its share of the region's housing need for four income categories that encompass all levels of housing affordability and must be certified by the HCD. See Table 4.14-5, SCAG's 6th Cycle Final RHNA Allocation, for a breakdown of the allocations for the SCAG region, Los Angeles County, and the cities surrounding Cal Poly Pomona (Pomona, Walnut, San Dimas, Diamond Bar, and Industry).

CSU Enrollment and Operating Budget

To meet future demand for higher education from students, and the longer-term workforce needs of California for more baccalaureate degrees, the CSU Board of Trustees has directed each campus of the CSU to take the necessary steps to accommodate additional enrollment increases. The CSU Board of Trustees requires each CSU campus to prepare a Master Plan depicting existing and anticipated facilities "necessary to accommodate a specified enrollment at an estimated planning horizon, in accordance with approved educational policies and objectives" (CSU 2023). Master Plans are based on annual FTES college year enrollment targets prepared by each campus in consultation with the CSU Board of Trustees (CSU 2020). FTES, rather than student headcount, is used to characterize the campus student population.

Each year, the CSU works with the State of California to identify needed funding in support of planned enrollment growth as part of the annual state budget process. The annual state budget identifies anticipated enrollment growth systemwide for the CSU each year. Once funding has been finalized by the state, the CSU allocates enrollment growth funding for California residents according to an enrollment target for each of the 22 CSU campuses. Campuses are expected to manage their enrollments within a small margin of error around the target, as they receive state/CSU funding only for the targeted number.

Cal Poly Pomona Housing Policies

Cal Poly Pomona has an on-campus residential requirement for first-year freshmen who graduated high school from outside the local service area. However, University Housing Services has paused the first-year student residential requirement for the 2025-2026 academic year. As such, incoming first-year students will not be required to complete the housing application process unless they choose or need to live on campus (Cal Poly Pomona 2024c). Therefore, for the purposes of this EIR, the on-campus student population does not correspond to the freshman class of incoming students who are outside the local service area.

4.14.2.3 Local

Connect SoCal 2024

SCAG is the Metropolitan Planning Organization (MPO) for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. As the designated MPO, SCAG is mandated to research and develop plans for transportation, growth management, hazardous waste management, and air quality. SCAG is responsible for planning efforts that result in the RTP and the Federal Transportation Improvement Program. SCAG also develops the SCS to reduce greenhouse gas emissions as required by the Sustainable Communities and Climate Protection Act (Senate Bill 375). The RTP is a long-range transportation plan that is developed and updated by SCAG every four years to guide transportation investments throughout the region. The SCS is a required element of the RTP that integrates land

use and transportation strategies to achieve California Air Resources Board emissions reduction targets pursuant to Senate Bill 375. Together, SCAG's RTP/SCS is known as Connect SoCal 2024.

The SCAG Regional Council adopted the Connect SoCal in April 2024. As part of Connect SoCal, SCAG develops population and housing forecasts for the SCAG region and for the jurisdictions that make up the SCAG region. SCAG is responsible for developing demographic projections; developing land use, housing, employment, transportation programs and strategies for South Coast Air Quality Management District; ensuring that the RTP and the Federal Transportation Improvement Program conform to the State Implementation Plans for transportation-related criteria pollutants, per the Clean Air Act; preparing the RHNA, including planning for future population, housing, and employment growth throughout the SCAG region; and preparing the Southern California Hazardous Waste Management Plan. SCAG is the responsible agency for developing and adopting regional housing, population, and employment growth forecasts within the SCAG region. SCAG's demographic data is developed to enable the proper planning of infrastructure and facilities to adequately meet the needs of the anticipated growth.

According to SCAG, for the purpose of determining consistency with Connect SoCal under the California Environmental Quality Act (CEQA), lead agencies have the sole discretion in determining a local project's consistency; consistency should be evaluated using the goals and policies of Connect SoCal and its associated program environmental impact report. Connect SoCal does not supersede or otherwise affect a local jurisdiction's authority or decisions on future development. There is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be consistent with Connect SoCal (SCAG 2024b).

4.14.3 Thresholds of Significance and Methodology

4.14.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section15064.7). The significance criteria used to evaluate the proposed Master Plan's impacts to population and housing are based on CEQA Guidelines Appendix G. For the purposes of this proposed Master Plan, a potentially significant impact to population and housing would occur if the proposed Master Plan would:

1. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

4.14.3.2 Methodology

To evaluate the potential impacts of the proposed Master Plan on the local and regional population and housing availability, the projected campus population was compared to projected regional and local population, and housing supplies.

Under existing conditions, the Cal Poly Pomona main campus supports a student and faculty population. Student enrollment at Cal Poly Pomona is measured using FTES. One undergraduate FTES is equal to 15 units at Cal Poly Pomona. For the purposes of this EIR, FTES is generally the most appropriate measure of student population at the campus, as opposed to headcount, because it provides a more accurate representation of the population that will be on campus at a given time. Headcount totals assume that every enrolled student is on campus full time, which can lead to an overstatement of the campus's student population and, consequently, the associated environmental impacts. Potential impacts associated with the on-campus population (i.e., vehicle miles traveled, demand for water or public services, solid waste generation), are analyzed proportionate to the amount of time any one student or faculty member may be on campus based on their unit loads, or staff based on their responsibilities.

However, student, faculty, and staff headcount is considered the preferred metric for the purposes of analyzing population changes for a project of this nature (i.e., a Master Plan). Part-time students enrolling at the University could relocate from outside the area and would be considered new residents. For this reason, the use of fall headcount is considered more appropriate than FTES when considering population-based analysis. This EIR, where appropriate, uses Fall 2023 headcount data because enrollment is generally highest during the fall term, decreases slightly during the spring semester, and decreases substantially during the summer. As such, in order to provide a conservative estimate of existing conditions in relation to the release of the NOP on April 8, 2024, the modified environmental baseline is used as the basis for assessing population growth against the projected 2040 buildout year.

In addition to the student population, the proposed Master Plan projects the associated faculty and staff, which includes employees and auxiliary employees, that would be necessary to support students at Cal Poly Pomona. Employees include the following occupational groups: faculty, professional/technician, office/administrative support, service occupations, construction/maintenance/transportation, and management. The total number of employees excludes student employees, other intermittent or casual employees, and faculty teaching in extension, special sessions, and summer sessions.

This analysis conservatively assumes that all population growth associated with the proposed Master Plan would be new to the study area (i.e., would relocate into Los Angeles County from other areas). For the purposes of the impact analysis, students are assumed to have no household members given that the number of student families is relatively low, and faculty and staff are assumed to have 2.73 household members, which is the average household size in Los Angeles County reported by the California Department of Finance (DOF 2024b).

4.14.4 Impact Analysis

4.14.4.1 Project Impacts

Impact 4.14-1 The project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). (Less than Significant)

Direct population growth related to the proposed Master Plan and near-term projects could result from development of academic and student support services, and other campus uses that would allow Cal Poly Pomona to increase its student enrollment. An increase in student enrollment would also result in an increase in faculty, staff, and their families. Indirect population growth related to the proposed Master Plan and near-term projects could result if roads

or infrastructure were extended into currently unserved off-campus areas or if the capacity of the facilities, roadways, or utilities exceeds that required to serve proposed growth. Direct and indirect population growth is evaluated below.

Program-Level Analysis for Master Plan

Direct Growth

Population. The Master Plan is a long-range planning document that guides the development and use of campus lands to accommodate projected growth in student enrollment and in fulfillment of Cal Poly Pomona's academic mission. Implementation of the Master Plan would accommodate a projected increase in the total on-campus population. In response to the projected increase in total on-campus population, implementation of the Master Plan proposes an increase in on-campus building space. Development proposed under the Master Plan would be consistent with the direction of the CSU Board of Trustees, described in Section 4.14.2, Regulatory Setting, that each campus of the CSU take the necessary steps to accommodate additional systemwide enrollment increases. The Master Plan proposes increases in on-campus housing, academic space, and supporting uses, related to the projected increase in student enrollment and associated faculty/staff increases. In that respect, the Master Plan would accommodate planned population growth, which is inherent to a long-term campus plan, much like a city or county General Plan.

Implementation of the proposed Master Plan would provide for new facility space, an increase in student enrollment, and an associated increase in faculty and staff. Table 4.14-6, below, shows the proposed Master Plan is anticipated to support 34,500 students (headcount) by 2040. As of Fall 2023, the Cal Poly Pomona campus supported 26,415 students, along with 2,762 faculty and staff. The proposed Master Plan would result in an increase of 8,085 students from Fall 2023 conditions, which represents a growth rate of approximately 31% over 15 years, or 2% per year. Similarly, an increase of 879 faculty and staff from Fall 2023 conditions would represent a growth rate of 32% over 15 years, or 2% per year.

Table 4.14-6. Existing and Projected Student, Staff, and Faculty Campus Population

	Existing Campus Population (Fall 2023)	Projected Buildout Campus Population (2040)	Net Increase (% Increase)
Student Population			
Students (FTES)	22,847	30,000	7,153 (31%)
Students (Headcount)[a]	26,415	34,500	8,085 (31%)
Staff and Faculty Population			
Staff and Faculty (FTE)	2,231	2,941	710 (32%)
Staff and Faculty (Headcount)[b]	2,762	3,641	879 (32%)

Source: Cal Poly Pomona, 2024a and 2024b.
Notes: Rounded to the nearest whole number.
[a] The projected student headcount was based on existing ratios of FTES to headcount, calculated as follows: Student Headcount = 1.15 * X FTES.
[b] The projected staff and faculty headcount was based on existing ratios of FTE to headcount, calculated as follows: Staff and Faculty Headcount = 1.238001 * X FTE.

As demonstrated above, implementation of the proposed Master Plan would be growth inducing in that increases in student, faculty, and staff populations would occur over the next 15 years. Additionally, population levels are

anticipated to be associated with household members and dependents of Cal Poly Pomona affiliates, as described in Section 4.14.3.2, Methodology. Under existing conditions, the campus is associated with approximately 33,955 students, faculty, staff, and family members (assuming 2.73 persons per household), based on the headcount population numbers.[6] Upon buildout of the proposed Master Plan in 2040, the campus population is anticipated to increase by approximately 10,485 students, faculty, staff, and family members.[7] This net population growth is conservatively assumed to be new to the study area (i.e., would relocate into Los Angeles County from other areas) even though many new Cal Poly Pomona students and staff already live in Los Angeles County at the time of their enrollment or employment. Given this assumption, the campus growth rate over the next 15 years is anticipated to be 31%, or 2% per year.[8]

Under a conservative scenario, the anticipated population growth would be greater than the growth rate of the surrounding cities of Pomona, Walnut, San Dimas, Diamond Bar, and Industry, which is anticipated to have a collective growth rate of 19%, or 1% per year, over a similar timeframe (between 2024 and 2045, see Table 4.14-2).[9] However, the population growth associated with the proposed Master Plan would represent approximately 0.10% of the total 2040 projected population in Los Angeles County (10,640,000) and 3.3% of the total 2040 projected population in the surrounding cities of Pomona, Walnut, San Dimas, Diamond Bar, and Industry, collectively. Although the proposed Master Plan's anticipated population growth would be greater than the growth rate of the surrounding cities within SCAG, the campus population is accounted for in the SCAG regional demographics and growth forecasts in Connect SoCal 2024. Given this, the proposed Master Plan would represent planned population growth.

As further detailed below, the proposed Master Plan identifies new housing projects on campus to support the on-campus student population. Although there are no plans for the construction of faculty or staff housing on campus, regional plans such as SCAG's Connect SoCal and the region's efforts to achieve RHNA goals would support off-campus students, faculty, and staff. Given the nature of the proposed Master Plan, the population growth anticipated is not considered substantial unplanned population growth. Impacts would be **less than significant**.

Housing. The current student housing program includes on-campus, mostly traditional student housing, as well as University Village Apartments, which are located in the southeast portion of the main campus. The proposed Master Plan would facilitate the construction of new on-campus housing. Additionally, the buildout projections on campus include separate projects, including the demolition of existing on-campus housing and construction of new on-campus housing, which are analyzed under separate environmental review. Table 4.14-7 summarizes existing housing and buildout projections.

6 26,415 students (assumed no additional household members) + (2,762 faculty and staff x 2.73 household members) = 8,085 + 7,540 (rounded to the nearest whole number) = 33,955 people

7 8,085 students (assumed no additional household members) + (879 faculty and staff x 2.73 household members) = 8,085 + 2,400 (rounded up to the nearest whole number) = 10,485 people

8 Calculation: [(33,955 + 10,485) - 33,955] / 33,955 = 10,485/33,955 = 0.308 × 100 = 31% (rounded to the nearest whole percentage)

9 See Table 4.14-2 for data. Calculation: [(319,000 – 267,714) / (267,714)] = (51,286/267,714) = 0.1915 x 100 = 19% (rounded to the nearest whole percentage)

Table 4.14-7. Existing and Projected Campus Housing

Phase	Number of Beds
Existing Occupied Space	
Student Housing[1]	4,043
Already Approved but Not Yet Constructed Projects	
Student Housing Replacement Project (Phase II)	840
The "Reds" Traditional Halls Demolition and Site Restoration Encinitas Residence Hall (Building 20) Montecito Residence Hall (Building 21) Alamitos Residence Hall (Building 22) Aliso Residence Hall (Building 23)	-814
Proposed Master Plan Development	
Student Housing Replacement Project (Phase III)	1,040
Total Existing and Already Approved	*4,069*
Total New Master Plan Building	*1,040*
Total Net Campus Building (Master Plan Buildout)	*1,040*
Total Cal Poly Pomona (Existing and Approved plus Proposed Master Plan)	***5, 109***

Source: Cal Poly Pomona, 2024a and 2024b.

Notes: Rounded to the nearest whole number.

1 The total beds on campus are calculated as the sum of beds from each residence hall currently on campus, excluding the "Greys" (Palmitas and Cedritos Halls).

As demonstrated above, the Master Plan proposes Student Housing Replacement Project (Phase III), which would provide 1,040 beds. With the existing beds on the main campus, and the 840 new beds proposed as part of a previously approved housing project, the proposed Master Plan would provide for a total of 5,109 beds.

For planning purposes, with an increase of 8,085 students (headcount) and a buildout of approximately 5,109 student beds from the proposed Master Plan, this EIR conservatively assumes 2,976 students would be accommodated in off-campus housing. Additionally, some portion of the anticipated increase of 879 faculty and staff at Master Plan buildout can be expected to reside off-campus. The California Department of Finance estimated that the City of Pomona contained 44,503 housing units as of May 2024, with a vacancy rate of 3% and an average occupancy of 3.40 persons per household (DOF 2024b). In addition, SCAG projects housing growth in Pomona to reach 52,800 units by 2045 (a net increase of 8,297 units over 21 years, or 18.6%). Additionally, the 6th RHNA Cycle requires the City to accommodate the development of 10,558 additional units by 2029. This represents a housing goal that would adequately accommodate the future growth associated with the proposed Master Plan. In the event development potential does not meet housing goals, the Cal Poly Pomona campus is surrounded by additional cities with housing supply and projections, as detailed in Table 4.14-4. Together, the cities of Pomona, Walnut, San Dimas, Diamond Bar, and Industry are projected to collectively account for 96,800 units (an increase of 10,952 units) by 2045. Similarly, the cities surrounding Cal Poly Pomona are required to collectively plan for 15,637 housing units by 2029 with the implementation of the 6th RHNA Cycle. Given these considerations, housing projections and goals are anticipated to fully accommodate the additional population from the proposed Master Plan over the 2040-horizon. Thus, the projected housing need associated with the proposed Master Plan does not constitute unplanned growth, and the impact would be **less than significant**.

Indirect Growth

Indirect growth occurs beyond a project site, stimulated by a project's increased investment and spending associated with new direct growth. The discussion below discusses possible indirect growth outside of the Master Plan area (for example, through extension of roads or other infrastructure) resulting from the proposed Master Plan.

Development under the proposed Master Plan would consist of activities within Cal Poly Pomona's main campus, including construction, demolition, renovation, and infrastructure improvements. Several projects are proposed as part of the Master Plan and are summarized in Chapter 3, Project Description, Table 3-2. The mobility/circulation and utility infrastructure improvements are not considered external improvements. All internal campus roadway improvements would serve the proposed Master Plan components and would not indirectly induce additional unplanned development. Moreover, the proposed construction and renovation would be accommodated by existing utility connections and planned improvements (see Section 4.19, Utilities and Service Systems). As such, no new external roads would be constructed as part of the proposed Master Plan. Therefore, the proposed Master Plan would not result in indirect inducement of substantial unplanned population growth, and the impact would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Direct Growth

Population. The proposed Master Plan identifies priority projects to be implemented in the near term, which are specific development components identified in the Master Plan and are expected to be constructed in the first 5 to 10 years following proposed Master Plan approval. A list of the near-term projects is provided in Table 3-2, Proposed Master Plan Development, as shown in Chapter 3 of this EIR. For example, implementation of the proposed Master Plan would result in the construction of the Engineering Graduate Building (Building 14) and the renovation of the Library (Building 15) and Classroom/Lab/Administration Building (Buildings 98B/C/P). None of the near-term projects would result in an increase in the student population. Additionally, no new student housing on campus is proposed in the near-term. Therefore, impacts associated with substantial unplanned population growth would be **less than significant.**

Housing. No student housing projects are proposed for the near-term. Therefore, impacts associated with substantial unplanned population growth from new housing would be **less than significant**.

Indirect Growth

As discussed above, the proposed Master Plan would not directly induce unplanned population growth. Indirect growth occurs beyond a project site, stimulated by a project's increased investment and spending associated with new direct growth. The discussion below discusses possible indirect growth outside of the Master Plan area (for example, through extension of roads or other infrastructure) resulting from the proposed Master Plan.

In the near-term, new construction, renovation, and infrastructure improvements are planned under the proposed Master Plan. Near-term renovation is planned for the Library (Building 15), Classroom/Lab/ Administration Building (Buildings 98B/C/P), College of Letters, Arts, and Social Sciences (Building 5), College of Environmental Design (Building 7), Old Administration (Building 1), College of Science (Building 8), Kellogg West (Buildings 76, 76A, 77, 78), College of Engineering (Building 9), Engineering Labs (Building 17), Darlene May Gymnasium (Building 41), Kellogg Gymnasium (Building 43), and Art Department/Engineering Annex (Building 13).

New construction is planned for the Engineering Graduate Building (Building 14) and for the following mobility/circulation and utility infrastructure improvements: the New Campus Transit Center (Bronco Mobility Hub [Building 133]), Kellogg Drive and East Campus Drive Roadway Reconfiguration (including I-10 Gateway), Campus Loop Improvements and Pedestrian Malls, Well Water and Water Treatment Plant Expansion (Building 27), and Lower Reservoir Tank Replacement (Building 144).

The aforementioned mobility/circulation and utility infrastructure improvements are not external improvements. All internal campus roadway improvements would serve proposed near-term development components and would not indirectly induce unplanned development. Moreover, the proposed construction and renovation would be accommodated by existing utility connections and planned improvements (see Section 4.19, Utilities and Service Systems). As such, no new external roads would be constructed in the near term. Therefore, the proposed near-term projects would not result in indirect inducement of substantial unplanned population growth, and the impact would be **less than significant**.

Impact 4.14-2 **The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. (Less than Significant)**

Program-Level Analysis for the Master Plan

Development of the proposed Master Plan would not result in the permanent removal of any housing on campus, nor would it result in the substantial displacement of people on the campus. As discussed above, the proposed Master Plan proposes Student Housing Replacement Project (Phase III), which would provide 1,040 beds. With the existing beds on the main campus, and the 840 new beds proposed as part of a previously approved housing project, the proposed Master Plan would provide for a total of 5,109 beds.

Given the above analysis, implementation of the proposed Master Plan would not displace significant numbers of existing people or housing such that construction of additional housing would be needed. Impacts of the proposed Master Plan would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Development of the near-term projects would not result in the permanent removal of any housing on campus, nor would it result in the substantial displacement of people on the campus. Additionally, no student housing projects are proposed for the near-term. Therefore, implementation of the near-term projects would not displace significant numbers of existing people or housing such that construction of additional housing would be needed. Impacts of the near-term projects would be **less than significant**.

4.14.4.2 Cumulative Impacts

Impact 4.14-3 **The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to population and housing. (Less than Significant)**

The proposed Master Plan describes the land uses and building space requirements to support 30,000 FTES (34,500 headcount), an increase of nearly 7,153 FTES (8,085 headcount) from 2023 conditions. This represents a growth rate of approximately 31% over 15 years, or 2% per year, based on student headcount. Additionally, an

increase of 879 faculty and staff (headcount) from 2023 conditions represents a growth rate of 32% over 15 years, or 2% per year.

In May 2024, the Department of Finance estimated the City of Pomona contained 44,503 housing units with a vacancy rate of 3%. In addition, SCAG projects housing growth in Pomona to reach 52,800 units by 2045 (a net increase of 8,297 units over 21 years, or 18.6%). Additionally, the 6th RHNA Cycle requires the City to accommodate the development of 10,558 additional units by 2029. This represents a housing goal that would adequately accommodate the future growth associated with the proposed Master Plan, as explained in Impact 4.14-1. In the event development potential does not meet housing goals, the Cal Poly Pomona campus is surrounded by additional cities with housing supply and projections, as detailed in Table 4.14-4 above. Together, the cities of Pomona, Walnut, San Dimas, Diamond Bar, and Industry are projected to collectively account for 96,800 units (an increase of 10,952 units) by 2045. Similarly, the cities surrounding Cal Poly Pomona are required to collectively plan for 15,637 housing units by 2029 with the implementation of the 6th RHNA Cycle.

As previously discussed, housing projections for the cities surrounding Cal Poly Pomona are anticipated to fully accommodate the additional population from the proposed Master Plan over the 2040 horizon year. Therefore, the proposed Master Plan would not induce any construction of housing in the surrounding community that would potentially induce indirect population growth. The proposed Master Plan would not induce substantial unplanned population growth in the area, either directly or indirectly, such that there would be significant environmental effects. With the anticipated amount of new housing that would be built in the communities surrounding Cal Poly Pomona (see Table 4.0-1, Pending or Approved Reasonably Foreseeable Projects), and the forecasted population increase throughout 2045 (Tables 4.14-2 and 4.14-4), the proposed Master Plan would not result in a cumulatively considerable contribution to population and housing impacts. Thus, cumulative impacts would be **less than significant**.

4.14.5 Mitigation Measures

Mitigation measures are not required because a significant impact has not been identified.

4.14.6 Level of Significance After Mitigation

All impacts would be less than significant without mitigation.

4.14.7 References

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4.15 Public Services

The following analysis identifies potential impacts to public services resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing public services in the proposed Master Plan area including fire protection, police protection, schools. Parks and recreation, and libraries; discusses the regulatory setting, evaluates potential impacts to public services; and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts.

No comments related to public services were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are provided in Appendix A.

4.15.1 Environmental Setting

4.15.1.1 Fire Protection

Los Angeles County Fire Department

The Los Angeles County Fire Department and specifically Station 187 is the primary responder to fire and emergency medical calls on the Cal Poly Pomona campus. Fire Station 187 is located at 3325 Temple Avenue, approximately 0.3-mile from campus (City of Pomona 2025a). The station is staffed with four sworn personnel, including one captain, two firefighters, and one fire fighter specialist. Average response times to the campus vary, depending on the location of the incident and available resources. According to the City of Pomona's 2014 General Plan, the average response time in 2012 for the first-arriving unit was approximately 4 minutes and 46 seconds (City of Pomona 2014a). This is under the national guideline used by Los Angeles County Fire Department of 5-minute response times for the first-arriving unit for fire and emergency medical services responses and 8 minutes for the advanced life support unit in urban areas (City of Pomona 2014a).

In addition to Station 187, the Los Angeles County Fire Department serves the City of Pomona (City) and operates six fire stations within the City, including Fire Stations 182, 183, 184, 185, 186, and 188 (City of Pomona 2025a). Additional support from these facilities may be solicited in the event that Station 187 cannot meet the immediate needs of a call for services independently or does not have the capability to address the full extent of a larger incident. Table 4.15-1 identifies the three closest fire stations to the main campus.

Table 4.15-1. Existing Fire Stations

Station	Address/Location	Apparatus	Distance from Cal Poly Pomona (miles)
187	3325 W. Temple Avenue, Pomona, California 91768	1 captain, 1 fire fighter specialist, and 2 fire fighters	0.7
184	1980 W. Orange Grove Avenue, Pomona, 91768	1 captain, 1 fire fighter specialist, and 3 fire fighters	2.4
121	346 Armitos Place, Diamond Bar, California 91765	1 captain, 1 fire fighter specialist, and 1 fire fighter	2.7

Source: City of Pomona 2014a; City of Diamond Bar 2019.

The Emergency Medical Services section of the Los Angeles County Fire Department is responsible for all basic and advanced emergency medical services (Los Angeles County Fire Department 2025).

4.15.1.2 Police Protection

University Police

The University Police Department is a full-service, sworn police agency that operates 24 hours a day, year-round. The department provides law enforcement and emergency response, conducts criminal investigations, and offers crime prevention and educational programs, support for special events, and a range of other services. The University Police Department is located at 3801 W. Temple Avenue, Building 109 (Cal Poly Pomona 2024a). University Police officers are the first responders for all law enforcement–related incidents within campus boundaries. The University Police Department receives all 9-1-1 calls made from on-campus land lines. Calls made from cell phones are routed to the California Highway Patrol or local law enforcement.

University Police officers are vested with the same powers and responsibilities as other police officers within the State of California. Their authority is granted through legislative action defined in the California Education and Penal Codes. University Police officers meet the California Peace Officer's Standards and Training Commission requirements, which are mandated for all California law enforcement officers, and they have full arrest authority (Cal Poly Pomona 2024b).

An Administrative Agreement (MOU) between the University Police Department, City of Pomona Police Department, and Los Angeles Sheriff's Department defines and details operational authority pursuant to the Kristin Smart Campus Safety Act of 1998, Education Code SB 1729. This agreement designates which law enforcement agency has operational responsibility for the investigation of alleged violent crimes (Part 1 crimes) and defines the specific geographical boundaries of each agency's operational responsibility. The University Police Department has mutual aid agreements and cooperates fully with local and state law enforcement agencies, including the City of Pomona Police Department, the Los Angeles County Sheriff and Fire Departments, and the California Highway Patrol. University Police Department investigators meet with area law enforcement representatives to share information regarding criminal activity, law enforcement intelligence, and trends. The University Police Department also collaborates with other California State University campus law enforcement, public safety, and security offices to enhance investigations and crime prevention activities (Cal Poly Pomona 2024a). In addition to emergency medical services provided by the Los Angeles County Fire Department, it is the policy of the University Police Department that all officers and other designated members be trained to provide emergency medical aid and to facilitate an emergency medical response (Cal Poly Pomona 2024b).

City of Pomona

Police protection services for the City of Pomona are provided by the City's Police Department. The City's Police Department headquarters is at 490 West Mission Boulevard, approximately 4.6 miles east of the Cal Poly Pomona main campus. At the time of drafting the City of Pomona 2014 General Plan EIR, the City's Police Department had 163 sworn personnel and 106 non-sworn personnel, which represented a ratio of 1.1 officers per 1,000 people. In 2012, the average emergency response time was 3.96 minutes for life threatening calls and 9.68 minutes for crime in progress calls (City of Pomona 2014a). Based on the City's estimated 2024 population of 152,166 (DOF 2024),

the City's approximately 163 sworn personnel (officers) would still represent 1.1 officers per 1,000 residents.[1] Patrol officers respond to calls Citywide 24 hours a day 7 days a week.

City of Walnut

Police protection for the City of Walnut is provided by the Los Angeles County Sheriff's Department. The closest Los Angeles County Sheriff's Department station is located at 21695 East Valley Boulevard, approximately 2.5 miles south-southwest of the Cal Poly Pomona main campus. At the time of drafting the City of Walnut 2018 General Plan EIR, response times averaged at 4.2 minutes, with priority calls at 8.1 minutes and routine calls at 21 minutes (City of Walnut 2018a).

4.15.1.3 Schools

The Cal Poly Pomona area is served by the Pomona Unified School District. Table 4.15-2 provides a list of schools within the Pomona Unified School District and their associated enrollment and enrollment capacity. As shown in Table 4.15-2, Pomona Unified School District Schools have a total remaining capacity of 12,368 students.

International Polytechnic High School (I-Poly High School) is a specialized public college prep high school located on the Cal Poly Pomona campus that is operated by the Los Angeles County Office of Education in collaboration with the College of Education and Integrative Studies and Cal Poly Pomona. I-Poly High School enrolls approximately 500 high-school students (I-Poly High School 2025).

Table 4.15-2. Pomona Unified School District Schools

School Name[a]	Location[a]	Enrollment[b]	Enrollment Capacity[a]	Remaining Capacity
High Schools				
Diamond Ranch High	100 Diamond Ranch Drive	1,567	1,970	403
Ganesha High	1151 Fairplex Drive	943	1,680	737
Garey Senior High	321 West Lexington Avenue	1,604	2,180	576
Pomona Senior High	475 Bangor Street	1,105	1,835	730
	High School Subtotal	*5,219*	*7,665*	*2,446*
Middle Schools				
Emerson Middle	635 Lincoln Avenue	677	1,170	493
Fremont Academy of Engineering and Design (7-10)	725 West Franklin Avenue	631	990	359
Lorbeer Middle	501 Diamond Bar Boulevard, Diamond Bar CA 91765	676	930	254
Marshall (John) Middle	1921 Arroyo Avenue	273	1,030	757
Simons Middle	900 East Franklin Avenue	623	1,050	427
	Middle School Subtotal	*2,880*	*5,170*	*2,290*

[1] (163 officers/152,166 City residents) per (1,000 residents/1 officer) = 1.07 or 1.1 officers per 1,000 residents.

Table 4.15-2. Pomona Unified School District Schools

School Name[a]	Location[a]	Enrollment[b]	Enrollment Capacity[a]	Remaining Capacity
Elementary Schools				
Alcott Elementary	1600 South Towne Avenue	634	1,178	544
Allison Elementary	1011 Russell Place	436	608	172
Armstrong Elementary	22750 Beaverhead Drive Diamond Bar, CA 91765	249	620	371
Arroyo Elementary	1605 West Arroyo Avenue	481	1,092	611
Barfield (C. Joseph) Elementary	2181 North San Antonio Avenue	282	782	500
Cortez Mathematics and Science Magnet School (Pre K-8)	1300 North Dudley Street	619	717	98
Decker Elementary	20 Village Loop Road	432	678	246
Golden Springs (Pre K-8)	245 South Ballena Drive Diamond Bar, CA 91765	394	862	468
Harrison School (K-8)	425 East Harrison Avenue	314	667	353
Kellogg Polytechnic Elementary	610 Medina Street	368	709	341
Kingsley Elementary	1170 Washington Street	713	1,006	293
Lexington Elementary (Pre K-8)	550 West Lexington Avenue	535	840	305
Lincoln Elementary	1200 North Gordon Street	363	738	375
Lopez Elementary	701 South White Avenue	406	438	32
Madison Elementary	351 West Phillips Boulevard	370	914	544
Pantera Elementary School	801 Pantera Drive Diamond Bar, CA 91765	484	457	-27
Philadelphia Elementary	600 East Philadelphia Street	521	1,040	519
Ranch Hills Elementary	2 Trabuco Place	416	596	180
Roosevelt Elementary	701 North Huntington Boulevard	502	1,042	540
San Jose Elementary	2015 Cadillac Drive	552	667	115
Vejar Elementary	950 West Grand Avenue	750	1,227	477
Washington Elementary	975 East Ninth Street	664	739	75
Westmont Elementary	1780 West Ninth Street	352	852	500
	Elementary School Subtotal	*10,837*	*18,469*	*7,632*
	Total	**18,936**	**31,304**	**12,368**

Source:
[a] City of Pomona 2014a
[b] California Department of Education 2025
Notes: N/A = Not Available
All schools are located in the City of Pomona, unless otherwise indicated.

4.15.1.4 Parks and Recreation

Campus Facilities

Cal Poly Pomona maintains various outdoor quadrangles, courtyards, plazas, parks, open spaces, and active recreational facilities that provide opportunities for gathering places, student activities, organized events, and other academic uses.

The Association of Physical Plant Administrators has established six levels of grounds attention. When staffed and funded appropriately, Cal Poly Pomona Facilities Planning & Management Department's Landscape Services Division strives to achieve and maintain a Level 2, High level of maintenance, which is approximately 7 to 14 acres per 1.0 FTE staff. Under existing conditions, Cal Poly Pomona is only staffed and funded to maintain a Level 3, Moderate level of maintenance, or approximately 17 acres per 1.0 FTE staff.

Table 4.15-3 delineates each existing resource, its associated size by square footage and acres, and its current use type (passive, active, recreation, or open space).

Passive Recreation

On-campus passive open space that can be used for passive recreation under existing conditions, includes the W.K. Kellogg Arabian Horse Center (Building 29), the John T. Lyle Center for Regenerative Studies, the Voorhis Ecological Reserve, AGRIscapes Discovery Farm, and other areas of open space in the hillsides on the north and northwest of the main campus. Cal Poly Pomona maintains multiple passive recreational spaces throughout the campus, including University Quad, University Park, Japanese Garden, Rose Garden, BioTrek Ethnobotany Garden, Bronco Commons, Engineering Meadow, Voorhis Park, and The Park at 98. University Housing Services manage on-site open space for passive recreational use, including Residential Hall Lawn, Encinitas Hall Lawn, and Suites Courtyard. In addition, passive open space on campus includes Bronco Commons, which serves as an outdoor performance venue with a stage and a recreational field.

Active Recreation

On-campus active recreational facilities include the Bronco Recreation and Intramural Complex (BRIC) (Building 42), which operates both outdoor and indoor recreation. Outdoor facilities consist of a 10-lane recreational lap pool and leisure pool. Indoor facilities consist of five multipurpose rooms, a climbing wall, three basketball/volleyball courts, two racquetball courts, one multi-activity enclosed court, flexible fitness equipment space for cardio and strength training, and an indoor track. In addition to the BRIC, the campus includes the Bronco Student Center (Building 35), which provides space for a Games Room and TV Lounge. Campus Athletics contain multiple on-campus active recreational facilities, including the Kellogg Gymnasium (Building 43), Darlene May Gymnasium (Building 41), Scolinos Baseball Field, Kellogg Track and Infield, a soccer field, and tennis courts. University Housing Services maintains on-campus facilities, such as an outdoor sand volleyball court, and the Montecito Hall Basketball Court.

Table 4.15-3. Existing Campus Open Space and Recreational Facilities

Facility Name	Approximate Square Feet	Approximate Acres
Passive Open Space		
AGRIscapes Discovery Farm	300,000	6.9
Voorhis Ecological Reserve	3,000,000	68.9
W.K. Kellogg Arabian Horse Center	2,498,815	57.36
John T. Lyle Center for Regenerative Studies	1,437*	0.03
Passive Recreational Space		
Engineering Meadow	76,000	1.7
BioTrek Ethnobotany Garden	30,000	0.7
Japanese Garden	34,000	0.8
Rose Garden	37,000	0.9
University Park	56,327	1.3
Voorhis Park	60,000	1.4
The Park at 98	12,194	0.3
Bronco Commons	67,000	1.5
University Quad	217,000	5.0
Suites Courtyard (Building 62)	14,978	0.3
Residential Hall Lawn (Building 74)	13,799	0.3
Encinitas Hall Lawn (Building 20)	31,269	0.7
Total Passive Space	**6,449,819**	**148.1**
Active Recreational Space		
Outdoor		
Bronco Recreation and Intramural Complex (BRIC) – Swimming Pools	—	—
Kellogg Track and Infield	130,000	3.0
Outdoor Basketball Courts and Surrounding Surface Space	16,000	0.4
Scolinos Baseball Field	123,000	2.8
Soccer Field/Open Recreational Field	494,000	11.3
Tennis Courts and Surrounding Surface Space	66,000	1.5
Indoor		
BRIC ▪ 5 multipurpose rooms ▪ Climbing wall with roped climbing and bouldering ▪ 3 basketball/volleyball courts and 1 multi-activity court enclosed with partial height dasher boards ▪ Flexible fitness equipment space for cardio and strength training track ▪ 2 racquetball courts	119,382	2.7
Bronco Student Center	18,000	0.4

Table 4.15-3. Existing Campus Open Space and Recreational Facilities

Facility Name	Approximate Square Feet	Approximate Acres
Darlene May Gym and Kellogg Gym	123,000	2.8
La Cienega Center (closed)	1,700	less than 0.1
Total Active Recreational Space	**1,091,082**	**24.9**

Source: Cal Poly Pomona 2011, 2024a and 2025.
* Square footage is only for the outdoor auditorium space.

A total of 173 acres of recreation and open space resources exists on campus. The existing network of park and open space facilities on the Cal Poly Pomona campus is generally available to the general public. Given the extensive amount of passive open space (i.e., the Voorhis Ecological Reserve), local community members often utilize these spaces for hiking and gathering spots. Cal Poly Pomona leases recreational fields to local soccer and little league organizations.

Local and Regional Parks

Off-campus parks surround the Cal Poly Pomona campus and are located within the cities of Pomona, Walnut, and San Dimas. Table 4.15-4, below identify parks within one mile of the campus. As shown below, approximately 15 acres of parkland are within the local vicinity of the Cal Poly Pomona campus.

Table 4.15-4. Local and Regional Parks

Facility Name	Location	Approximate Acres
Parks		
Kellogg Park	610 Medina Avenue, Pomona, CA 91768	2.53
Cesar Chavez Park	2720 Barjud Avenue, Pomona, CA 91768	1.07
Frank G. Bonelli Regional Park	120 East Via Verde Drive, San Dimas, CA 91773	4.42
Snow Creek Park	21610 Snow Creek Drive, Walnut, CA	7.00
	Total Park Space	**15.02**

Source: City of Pomona 2014a; DPR 2016; City of Walnut 2025

4.15.1.5 Libraries

Under existing conditions, the Cal Poly Pomona campus is supported by an on-campus University Library (Building 15), which is located in the center of campus. The Library is six stories and has a total building area of 218,000 gross square feet. The Library's resources are for the campus community, which includes campus faculty, staff, students, and emeritus. However, the general public is able to use the Library space to utilize Library resources such as the Bronco Family Space, the Library physical materials collection, Special Collections and Archives (with a reservation), and attend Library programming. Other resources, such as digital collections, course reserves, borrowing books, media/maker space studio, reflection room, are only available to members of the campus community.

The American Library Association and the Association of College and Research Libraries (ACRL) maintains standards and guidelines that are often referenced to determine standards for various library services and initiatives. Integrated Postsecondary Education Data Systems reporting and the CSU system-wide libraries, often in consultation with the Council of Library Deans, also develop policy and practices employed by CSU libraries. CSU policy provides library

space standards for CSU campuses that are based on the approved student enrollment. At 20,000 full-time equivalent students (FTES) a campus should provide 100,000 assignable square feet (ASF) of library space and at 25,000+ FTES a CSU campus should provide 120,000 ASF of library space (CSU 2020). The existing Cal Poly Pomona Library meets these requirements as it has approximately 172,000 ASF of space.

Local libraries surrounding the Cal Poly Pomona campus include the Pomona Public Library, the Walnut Public Library, the Covina Public Library, and the San Dimas Library. Given the extensive on-campus library resources, Cal Poly Pomona students would be unlikely to use local libraries to any significant extent.

4.15.2 Regulatory Setting

4.15.2.1 Federal

There are no federal public services laws, regulations, plans, ordinances, or policies applicable to the proposed Master Plan.

4.15.2.2 State

California Occupational Safety and Health Administration

In accordance with California Code of Regulations, Title 8, Sections 1270 and 6773, the California Occupational Safety and Health Administration has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

Emergency Response/Evacuation Plans

The State of California passed legislation authorizing the Office of Emergency Services to prepare a Standard Emergency Management System program, which sets forth measures by which a jurisdiction should handle emergency disasters. Non-compliance with the Standard Emergency Management System could result in the state withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster.

California Fire Code

The California Fire Code is Chapter 9 of Title 24 of the California Code of Regulations. The California Fire Code provides regulations for safeguarding life and property from fire and explosion hazards derived from the storage, handling, and use of hazardous substances, materials, and devices. The provisions of this code apply to construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenance connected or attached to such building structures throughout the state.

California Building, Fire, and Health and Safety Codes

CSU policy provides required procedures to be used during planning, design and construction of buildings and other facilities on CSU campuses (CSU 2024). Based on these procedures Cal Poly Pomona is required to comply with current California Building, Fire, and Health and Safety Code regulations intended to reduce risk of damage to property

and persons for all new development. Applicable regulations address building standards including roofing and roof access, fire flow (water) infrastructure, design of hydrant systems, fire protection systems (sprinklers and alarms), fire extinguishers, and structure egress. New development must also comply with access requirements (primary and secondary), provide adequate fire lanes, and maintain defensible space. The CSU's Office of Fire Safety is responsible for reviewing plans to ensure compliance with applicable California Fire Code standards (CSU 2024).

California Health and Safety Code

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, including regulations for building standards (also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

Mutual Aid Agreements

The California Disaster and Civil Defense Master Mutual Aid Agreement, as provided by the California Emergency Services Act, provides statewide mutual aid between and among local jurisdictions and the state. The statewide mutual aid system exists to ensure that adequate resources, facilities, and other supports are provided to jurisdictions whenever resources prove to be inadequate for a given situation. Each jurisdiction controls its own personnel and facilities but can give and receive help whenever needed.

Leroy F. Greene School Facilities Act

A qualified agency, such as a local school district, may impose fees on new residential construction to compensate for the impact that a residential[2] project will have on existing school facilities or services. The California Legislature passed Senate Bill (SB) 50 in 1998 to insert new language into California Government Code Section 65995.5-65985.7, which authorized school districts to impose fees on new residential construction in excess of mitigation fees authorized by California Government Code Section 66000. School districts must meet a list of specific criteria, including the completion and annual update of a School Facility Needs Analysis, in order to impose additional fees under the Government Code. Under the terms of this statute, payment of statutory fees for new residential construction is considered to mitigate in full, for the purposes of compliance with the California Environmental Quality Act (CEQA), any impacts to school facilities associated with a qualifying project. The fees are assessed based upon the proposed square footage of the new or expanded residential development. These statutory fees do not apply because as a state entity, CSU/Cal Poly Pomona is not subject to these fees for this type of development at CSU campuses.

California Government Code Section 66477 (The Quimby Act)

California Government Code Section 66477, commonly known as the Quimby Act, was intended to help local communities generate the resources necessary to provide park and recreational facilities. The Quimby Act preserves open space and parkland in urbanizing areas of the state by authorizing local governments to establish ordinances that require private developers of new subdivisions to dedicate land for parks, pay an in-lieu fee, or a

[2] "Residential units" and "residences" as used in the related Government Code sections means the development of single-family detached housing units, single-family attached housing units, manufactured homes and mobile homes, as defined in subdivision (f) of Section 17625 of the Education Code, condominiums, and multifamily housing units, including apartments, residential hotels, as defined in paragraph (1) of subdivision (b) of Section 50519 of the Health and Safety Code, and stock cooperatives, as defined in Section 4190 of the Civil Code.

combination of the two. The Quimby Act was designed to ensure "adequate" open space acreage in jurisdictions adopting Quimby Act standards. The Act requires 3 acres of park area per 1,000 persons residing within a subdivision, unless the amount of existing neighborhood and community park area already exceeds that limit, in which case the City may adopt a higher standard not to exceed 5 acres per 1,000 residents. The Act requires that standards for recreational facilities be adopted in the local general plan recreation element if a parkland dedication/fee ordinance is to be enacted. The Quimby Act does not apply to CSU, including Cal Poly Pomona, as the CSU is not a local government entity, does not assess fees from private developers, and therefore, is exempt.

While the Quimby Act does not apply to the CSU system, standards under the Act are used as a proxy for what would constitute adequate park and recreational space for proposed Master Plan-related on-campus residents in the impact analysis presented in Section 4.15.4, Impacts Analysis.

4.15.2.3 Local

As a state entity, Cal Poly Pomona is not subject to local government permitting and planning regulations, policies or ordinances, such as the general plans and ordinances for the cities of Pomona and Walnut and the County of Los Angeles. However, local plans relating to public services are summarized below to provide context for the analysis of off-campus public service facilities in Section 4.15.4, Project Impacts.

Los Angeles County 2035 General Plan Update – Parks and Recreation Element

The purpose of the Parks and Recreation Element of the Los Angeles 2035 General Plan update is to plan and provide for the existing and future development of the County's parks and recreation system for residents throughout the Los Angeles region. The County's park system, including facilities that are owned, operated, and maintained by the County, totals 69,594 acres. Parks and recreational resources throughout the County, and as described in the General Plan update, fall under two categories: Local Parks and Regional Parks. These categories are in addition to the various trails systems and indoor recreational facilities maintained by the County (Los Angeles County 2022). Frank G. Bonelli Regional Park is a regional park managed by the County's Department of Parks and Recreation.

City of Pomona General Plan Open Space Network Component

The Open Space Network Component of the 2014 City of Pomona General Plan Update identifies important local, regional resources and establishes guidelines for balancing the demands placed on the City's parks, open space, and recreational resources over the next 20 years. The 2014 General Plan established a park service goal of 3 acres of parkland for every 1,000 residents. The City of Pomona currently provides approximately 1.3 acres of park space per 1,000 residents, and has a goal of providing 3 acres of parkland per 1,000 residents (City of Pomona 2014b).

City of Walnut General Plan Conservation, Open Space, and Recreation Element

The City of Walnut Conservation, Open Space, and Recreation Element includes provisions and guidance for parks and recreational resources within the City. The City of Walnut General Plan establishes a parkland per resident ratio based on 2017 conditions (City of Walnut 2018b). The City maintains a total of approximately 105 acres of existing and future parkland. As such, the City establishes a standard of 2.95 acres per 1,000 persons (City of Walnut 2018b).

4.15.3 Thresholds of Significance and Methodology

4.15.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section 15064.7). The significance criteria used to evaluate the proposed Master Plan's impacts to public services are based on CEQA Guidelines Appendix G. For the purposes of this project, a potentially significant impact to public services would occur if the proposed Master Plan would:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
    a. Fire protection.
    b. Police protection.
    c. Schools.
    d. Parks.
    e. Other public facilities.

4.15.3.2 Methodology

This section is based on a review of available studies and documents provided by the Los Angeles County Fire Department, University Police Department, City of Pomona Police Department, Pomona Unified School District, University Library, City of Pomona Parks and Recreation Department, City of Walnut Parks and Recreation Department, and the County of Los Angeles Department of Parks and Recreation.

4.15.4 Impact Analysis

4.15.4.1 Project Impacts

Impact 4.15-1: **The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services. (Less than Significant)**

Program-Level Analysis for the Master Plan – Fire Protection

On-Campus Population

The provision of new or physically altered government facilities for fire protection is typically associated with unplanned population growth or new residential development. As discussed in Section 4.14, Population and Housing, the net increase in the on and off-campus population resulting from the proposed Master Plan would not be considered substantial unplanned population growth. Growth accommodated by the proposed Master Plan would result in an increase in total campus population of approximately 8,085 student headcount and 879 staff and faculty headcount, through the proposed Master Plan 2040 horizon year. On-campus housing is projected to increase by 1,040 net student beds. The increased on-campus population could result in an incremental increase in demand for fire protection services. However, an increase in campus population by itself does not determine whether a new or expanded fire facility is needed; rather, additional services and facilities are considered when an expansion of geographic distribution that may impair emergency response times, or new concentrations of people, occurs.

One consideration in evaluating the need for new fire stations or the relocation of existing stations is based on travel distance from the station to a project location. This is especially important for areas with large concentrations of people or areas with a higher risk for fire protection services. Fire Station 187 currently provides existing fire protection services to the Cal Poly Pomona campus and is located less than one mile from the campus. The travel distance from the existing fire stations to the campus would not change with implementation of the proposed Master Plan, because the proposed Master Plan would not result in an expansion of the campus beyond its existing boundaries. While many of the projects that would be developed under the proposed Master Plan would be renovated or demolished and replaced, implementation of the proposed Master Plan would result in the continuation of existing academic programs, extracurricular activities, and similar housing and instructional facilities, and thus, would not fundamentally change the nature of campus operations that would result in a substantial increase in the demand for fire protection.

The proposed Master Plan would not expand the service area of the Los Angeles County Fire Department and the distance from existing fire station would not change, as the Master Plan is considered infill development and would occur within the existing campus boundaries. Nor would the proposed Master Plan create a new population center where previously none exists. Thus, implementation of the proposed Master Plan is not anticipated to result in a substantial increase in on-campus service calls or response times.

In accordance with CSU policy, all new buildings under the proposed Master Plan would be designed to meet minimum fire and emergency safety requirements identified in the California Building, Fire, and Health and Safety Codes (CSU 2024). These requirements include appropriate fire safety measures and equipment, including but not limited to, the following: fire retardant building materials; roof access; emergency water infrastructure (fire hydrants and sprinkler systems) and adequate fire flow (water); smoke detectors, fire extinguishers and fire alarms; emergency response notification systems; adequate building egress; adequate emergency access ways for emergency vehicles; and maintenance of defensible space. The CSU's Office of Fire Safety is responsible for reviewing building plans to ensure compliance with applicable California Fire Code standards (CSU 2024). Thus, the demand for fire protection from any new net square footage on campus would be minimized and would not result in a substantial increase in demand for fire protection. Therefore, implementation of the proposed Master Plan would not result in the need for new or physically altered fire protection facilities and impacts would be **less than significant**.

Off-Campus Population

As discussed in Section 4.13, Population and Housing, growth accommodated by the proposed Master Plan would result in an increase in total campus population of approximately 8,085 student headcount and 879 staff and faculty headcount, through the proposed Master Plan 2040 horizon year. On-campus housing is projected to increase by 1,040 net student beds. Therefore, the proposed Master Plan would result in an increase in students, faculty, and staff who would live off campus.

Housing for the anticipated increase in students, faculty and staff that are expected to live off campus is likely to comprise a combination of already existing dwelling units and new units to be constructed in the future by unaffiliated third parties. Any prediction about the specific extent and location of the area's overall future housing patterns would be speculative, although a summary of planned housing projects in proximity to the campus is presented in Section 4.0, Environmental Analysis. To the extent the population increase associated with the proposed Master Plan would reside off campus in already existing dwelling units, the Master Plan would not result in an increase in demand for fire services and, correspondingly, the Master Plan would not require the construction of new or physically altered fire protection facilities in order to maintain acceptable response times. As to any new housing that might indirectly result from the proposed Master Plan's increase in off-campus population, when new housing is built, fees for fire protection services are typically included in building permits as part of the jurisdiction's development fee impact program. Through the use and collection of development impact fees from private developers, any potential increases in the demand for public services associated with Master Plan-related off-campus housing located in new housing tracts, including fire protection facilities, would be addressed in the respective jurisdiction in which the new population resides. Such fees would provide for new or physically altered fire protection facilities, if needed, to maintain response times. Moreover, to the extent new housing is constructed in the future, such construction would undergo its own environmental review under CEQA. As part of the review, the need for new or expanded fire protection facilities would be assessed and would be required to comply with applicable regulatory requirements and permits at the time that such fire stations are proposed; any assessment of such future need at this time would be speculative. Therefore, the proposed Master Plan's impact associated with the provision of new or physically altered fire protection facilities to serve the Master Plan's off-campus population would be **less than significant**.

Project-Level Analysis for Near-Term Projects – Fire Protection

Near-term projects include new construction, renovation, demolition, mobility and circulation improvements, and utility infrastructure improvements. These components would be developed as part of the proposed Master Plan and as such comprise infill development and would not result in an expansion of the main campus beyond its existing boundaries. Additionally, the near-term projects would be designed to meet minimum fire and emergency safety requirements identified in the California Building, Fire, and Health and Safety Codes, as required by CSU policy. These requirements include appropriate fire safety measures and equipment, including but not limited to, the following: fire retardant building materials; roof access; emergency water infrastructure (fire hydrants and sprinkler systems) and adequate fire flow (water); smoke detectors, fire extinguishers and fire alarms; emergency response notification systems; adequate building egress; adequate emergency access ways for emergency vehicles; and maintenance of defensible space. The CSU's Office of Fire Safety would review near-term project building plans to ensure compliance with applicable California Fire Code standards (CSU 2024).

As part of the proposed Master Plan analyzed in the previous subsection, these near-term projects are not anticipated to result in a substantial increase in on-campus service calls. Accordingly, construction and operation of the near-term development components would not result in the need for new or physically altered fire protection

facilities, the construction of which could cause significant environmental impacts, to maintain acceptable on-campus response times and the impact would **be less than significant**.

As for off-campus impacts, given the limited scope of the near-term projects, the increased off-campus populations associated with these components would not result in the need for additional fire protection facilities to maintain response times and, therefore, impacts would be **less than significant**.

Program-Level Analysis for the Master Plan – Police Protection

On-Campus Population

As explained in Section 4.15.1, Environmental Setting, the University Police Department provides law enforcement services to Cal Poly Pomona. The University Police Department has mutual aid agreements with local law enforcement agencies (e.g., City of Pomona Police Department, Los Angeles County Sheriff) to provide additional law enforcement resources if a significant incident occurs that requires additional assistance from other agencies.

Campus growth under the proposed Master Plan, described in Impact 4.15-1 (Fire Protection), could result in an incremental increase in the demand for University Police protection services by increasing the call volume for services on campus. As described below in the project-level analysis for near-term projects, a University Police satellite station would be constructed as part of the Bronco Mobility Hub project (Building 133). Expansion of police facilities to support the proposed Master Plan would be therefore accommodated by new building space planned under the proposed Master Plan, the impacts of which are evaluated in this EIR. Thus, the provision of new or physically altered police protection facilities is included in the Master Plan and evaluated throughout this EIR as a component of development under the proposed Master Plan. The impact of the proposed Master Plan associated with the need for new or physically on-campus police protection facilities would be **less than significant**.

Off-Campus Population

As described in Impact 4.15-1 (Fire Protection), the proposed Master Plan would result in an increase in students, faculty, and staff who are anticipated to live off campus. Housing for the anticipated increase in students, faculty and staff that are expected to live off campus is likely to comprise a combination of already existing dwelling units and new units to be constructed in the future by unaffiliated third parties. Any prediction about the specific extent and location of the area's overall future housing patterns would be speculative, although a summary of planned housing projects in proximity to the campus is presented in Section 4.0, Environmental Analysis.

To the extent the population increase associated with the proposed Master Plan would reside off campus in already existing dwelling units, the Master Plan would not result in an increase in demand for police services and, correspondingly, the Master Plan would not require the construction of new or physically altered police protection facilities in order to maintain acceptable response times. As to any new housing that might indirectly result from the proposed Master Plan's increase in off-campus population, when new housing is built, fees for police protection services typically are included in building permits as part of the jurisdiction's development fee impact program. Through the use and collection of development impact fees from private developers, any potential increases in the demand for public services associated with Master Plan-related off-campus housing located in new housing tracts, including police protection facilities, would be addressed in the respective jurisdiction in which the new population resides. Such fees would provide for new or physically altered police protection facilities, if needed, to maintain response times or other performance objectives. Moreover, to the extent new housing is constructed in the future, that housing would undergo its own environmental review under CEQA. As part of the review, the need for new or expanded police protection facilities would

be assessed and would be required to comply with applicable regulatory requirements and permits at the time that such police stations are proposed; any assessment of such future need at this time would be speculative. Therefore, the proposed Master Plan's impact associated with the need for new or physically altered police protection facilities to serve the Master Plan's off-campus population would be **less than significant**.

Project-Level Analysis for Near-Term Projects – Police Protection

Near-term projects include new construction, renovation, demolition, mobility and circulation improvements, and utility infrastructure improvements. The Bronco Mobility Hub, a near-term project, would include the construction of a University Police satellite station. This facility is mean to accommodate growth associated with the proposed Master Plan and near-term projects. The Bronco Mobility Hub has been evaluated in this EIR as a component of development under the proposed Master Plan. The impact of the near-term projects associated with provision of new or physically altered on-campus police protection facilities would be **less than significant**.

As for off-campus impacts, given the limited scope of the near-term projects, the increased off-campus population associated with these components would not result in the need for additional police protection facilities to maintain response times and, therefore, impacts would be **less than significant**.

Program-Level Analysis for the Master Plan - Schools

Children (other than Cal Poly Pomona students under the age of 18) would not be permitted to live in campus housing. Therefore, on-campus growth associated with the proposed Master Plan would not generate additional demand for elementary and secondary schools in the surrounding community.

As discussed in Section 4.14, Population and Housing, growth accommodated by the proposed Master Plan would result in an increase in total campus population of approximately 8,085 student headcount and 879 staff and faculty headcount, through the proposed Master Plan 2040 horizon year. With an increase of 879 faculty and staff at buildout would require off-campus housing. The growth in off-campus faculty and staff may introduce school-aged children that may attend local schools.

For the purposes of this analysis, a conservative approach was used which assumes that all school-aged children associated with the projected increase faculty and staff would be served by Pomona Unified School District. It is assumed that school-aged children associated with the faculty and staff would attend various schools throughout Pomona Unified School District and would not impact a particular individual school. Student generation rates developed for Pomona Unified School District are provided in Table 4.15-5.

Table 4.15-5. Student Generation Rates

Land Use Category	Generation Rates (per unit)			
	Elementary School	Middle School	High School	Total
Single-Family Detached	0.31	0.15	0.21	**0.67**
Single-Family Attached	0.24	0.12	0.15	**0.51**
Multifamily	0.10	0.05	0.08	**0.23**

Source: City of Pomona 2014a

Using the conservative assumption that all net new faculty and staff living off campus would reside in single-family detached units, 879 net new households would generate an estimated 589 additional students, based on the Pomona Unified School District's combined student generation rate of 0.67 students per single-family detached unit. Specifically, As shown in Table 4.15-2, based on the most recent available data, Pomona Unified School District has an overall remaining capacity for approximately 12,368 school-age students, excluding charter schools and alternative education schools for which capacity information was not available. Actual remaining capacity would be slightly higher when considering charter schools and alternative education schools.

The total estimated student generation resulting from the proposed Master Plan of approximately 589 school-age students would comprise approximately 5% of the remaining capacity of the existing Pomona Unified School District schools. Therefore, the Pomona Unified School District has sufficient capacity to accommodate the proposed Master Plan and new or expanded schools would not need to be constructed; this analysis is conservative because there are private schools in the region, not part of the Pomona Unified School District, providing additional capacity, which some students generated by the proposed Master Plan could attend. As the proposed Master Plan would not require new or physically altered school facilities, the impact related to schools would be **less than significant**.

Project-Level Analysis for Near-Term Projects - Schools

Near-term projects include new construction, renovation, demolition, mobility and circulation improvements, and utility infrastructure improvements. As described above, children (other than Cal Poly Pomona students under the age of 18) would not be permitted to live in campus housing. Therefore, on-campus growth associated with the proposed Master Plan would not generate additional demand for elementary and secondary schools in the surrounding community. Given the limited scope of the near-term projects, the increased off-campus population associated with these components would not result in the need for additional or physically altered school facilities, therefore, impacts would be **less than significant**.

Program-Level Analysis for the Master Plan - Parks

On-Campus Population

Cal Poly Pomona has substantial existing recreational facilities, as described in Section 4.15.1.4, Parks and Recreation, as well as recreational facilities planned with implementation of the proposed Master Plan. The proposed Master Plan would result in the renovation of the existing recreational fields, construction of a new Softball Facility, replacement of the Soccer Field and Kellogg Stadium, and expansion of the BRIC (Building 42) to serve the campus population of 34,500 students (headcount) and related growth in faculty and staff. As such, implementation of the proposed Master Plan would increase and improve the recreational services available for the existing and future campus population, and the physical impacts of these improvements are analyzed throughout Chapter 4 of this EIR.

In addition to the enrollment increase to 34,500 students, on-campus housing is projected to increase by 1,040 student beds, which will result in an associated increase in on-campus residential headcount population of approximately 5,109 (see Table 3-2). Based on the amount of acreage of designated athletics and recreation space that would be available on campus (24.9 acres) for 5,109 total on-campus residents, the proposed Master Plan would provide approximately 4.9 acres of parks and recreational land per 1,000 on-campus residents, which is greater than the state's standards for private developers under the Quimby Act (3 acres per 1,000 residents).[3]

[3] The Quimby Act does not apply to the CSU system because it is not a local government entity, does not assess fees from private developers, and is exempt.

Additionally, a total of 148.1 acres of open space exists on campus, which includes passive recreational and open space lands, as shown in Table 4.15-3.

As the proposed Master Plan would provide adequate outdoor and indoor recreational space and would provide additional natural open space lands for passive recreation, on-campus recreational facilities would accommodate the recreational needs of campus residents and the daily campus population. Therefore, the construction of additional parks and recreation facilities beyond those described in this EIR would not be required. New or physically altered recreational facilities are included in the proposed Master Plan and evaluated throughout this EIR as a component of development under the proposed Master Plan. The impact of the proposed Master Plan associated with the provision of new or physically altered on-campus recreational facilities would be **less than significant**.

Off-Campus Population

As discussed in Section 4.14, Population and Housing, growth accommodated by the proposed Master Plan would result in an increase in total campus population of approximately 8,085 student headcount and 879 staff and faculty headcount, through the proposed Master Plan 2040 horizon year. On-campus housing is projected to increase by 1,040 net student beds. Therefore, the proposed Master Plan would result in an increase in students, faculty, and staff who would live off campus.

Housing for the anticipated increase in students, faculty and staff that are expected to live off campus is likely to comprise a combination of already existing dwelling units and new units to be constructed in the future by unrelated third parties. Any prediction about the specific extent and location of the area's overall future housing patterns would be speculative, although a summary of planned housing projects in proximity to the campus is presented in Section 4.0, Environmental Analysis. To the extent the population increase associated with the proposed Master Plan would reside off campus in already existing dwelling units, the Master Plan would not result in an increase in demand for parks and, correspondingly, the Master Plan would not require the construction of new or physically altered park facilities in order to maintain acceptable response times. As to any new housing that might indirectly result from the proposed Master Plan's increase in off-campus population, when new housing is built, fees for parks are typically included in building permits as part of the jurisdiction's development fee impact program for private developers. Through the use and collection of development impact fees from private developers, any potential increases in the demand for parks associated with Master Plan-related off-campus housing located in new housing tracts, including parks, would be addressed in the jurisdictions within which the new population resides. Such fees would provide for new or physically altered park facilities, if needed, to maintain response times.

Moreover, to the extent new housing is constructed in the future, such construction would undergo its own environmental review under CEQA. As part of the review, the need for new or expanded park facilities would be assessed and would be required to comply with applicable regulatory requirements and permits at the time that such parks are proposed; any assessment of such future need at this time would be speculative. Therefore, the proposed Master Plan's impact associated with the provision of new or physically altered park facilities to serve the Master Plan's off-campus population would be **less than significant**.

Project-Level Analysis for Near-Term Projects - Parks

Near-term projects include new construction, renovation, demolition, mobility and circulation improvements, and utility infrastructure improvements. Renovation of the Darlene May Gymnasium (Building 41) and Title IX improvements to Kellogg Gymnasium (Building 43) are proposed as near-term projects. These projects are meant to accommodate growth associated with the proposed Master Plan and near-term projects. These projects have

been evaluated in this EIR as a component of development under the proposed Master Plan. The impact of the near-term projects associated with provision of new or physically altered on-campus recreational facilities would be **less than significant**.

As for off-campus impacts, given the limited scope of the near-term projects, the increased off-campus population associated with these components would not result in the need for additional recreational facilities and, therefore, impacts would be **less than significant**.

Program-Level Analysis for the Master Plan – Other Public Facilities

The University Library (Building 15) serves Cal Poly Pomona students, faculty, and staff. With the planned campus population growth, it is anticipated that the demand for library services would increase. However, a substantial increase in demand is not expected and the performance objectives of the Library would continue to be met. As described in Section 4.15.1.5, Libraries, CSU policy provides library space standards for CSU campuses. At 25,000+ FTES a CSU campus should provide 120,000 ASF of library space (CSU 2020); this standard is met by the existing Cal Poly Pomona Library. Additionally, as described below in the project-level analysis for near-term projects, renovation of the Library is planned. These improvements are designed to accommodate the increased demand associated with the planned increase in the student and faculty/staff population; therefore, additional on-campus library facilities beyond what is proposed in the Master Plan would not be necessary.

It is anticipated that most students, faculty, staff, and faculty, and staff would primarily utilize the Library as it serves the Cal Poly Pomona population. The increase in the student, faculty, and staff population is not anticipated to substantially increase the use of off-campus library services. Therefore, implementation of the proposed Master Plan would not result in the need for new or physically altered other public facilities and impacts would be **less than significant**.

Project-Level Analysis for Near-Term Projects – Other Public Facilities

Renovation of the University Library is identified as a near-term project. Additionally, the renovation of several academic facilities are considered in the near term and could accommodate additional study space. Because these near-term projects are included as part of the proposed Master Plan, the associated impacts are evaluated in this EIR. Thus, the need for new or physically altered library facilities is addressed in the Master Plan and evaluated throughout this EIR as a component of development under the proposed Master Plan. The proposed Master Plan would have a less than significant impact associated with the provision of new library facilities beyond what is identified throughout this EIR.

It is anticipated that primarily students, faculty, and staff, would utilize the Library as it serves the Cal Poly Pomona community. Near-term projects are limited in scope and not anticipated to substantially increase the use of off-campus library services. Therefore, implementation of the near-term projects would not result in the need for new or physically altered other public facilities and impacts would be **less than significant**.

4.15.4.2 Cumulative Impacts

Impact 4.15-2 **The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to public services. (Less than Significant)**

Public services for Cal Poly Pomona are provided by the Los Angeles County Fire Department; the University Police Department, City of Pomona Police Department, and Los Angeles Sheriff's Department; Pomona Unified School District; the University Library; and parks and recreational facilities are provided by Cal Poly Pomona, the City of Pomona, City of Walnut, and County of Los Angeles.

The Los Angeles County Fire Department; City of Pomona Police Department; Los Angeles County Sheriff's Department; Pomona Unified School District; and the City of Pomona, City of Walnut, and County of Los Angeles Park Departments also serve the nearby population. Cumulative development would increase the concentration of people and structures within these local public service jurisdictions which would increase demand for such services. As discussed in Section 4.15.4.1, Project Impacts, the projected campus population growth under the proposed Master Plan would also increase the demand for public services. However, as evaluated in Section 4.15.4.1, it is not anticipated that new or expanded public facilities would be required to accommodate development or growth under the proposed Master Plan. The proposed Master Plan would not expand the service area of public service providers that also provide services to the City of Pomona, City of Walnut, or County of Los Angeles, and projects implemented under the proposed Master Plan are considered infill development that would occur within the existing campus boundaries. Additionally, implementation of the proposed Master Plan would provide improvements to existing university services, such as providing renovated library space and updating recreational facilities and is not anticipated to increase off-campus use of libraries and parks and recreational facilities.

Further, any new development and growth from related projects would occur within existing developed areas where adequate public services currently exist as the City of Pomona, City of Walnut, and this region of the County of Los Angeles are completely urbanized. Other related cumulative development projects would be required to pay impact fees consistent with local jurisdiction requirements, such as fire facilities, park and recreation facilities, police facilities, and school impact fees, to ensure the adequate provision of public services. Nonetheless, implementation of the proposed Master Plan would not expand service areas nor is it anticipated to require additional facilities or services, and therefore the impact of proposed Master Plan buildout on public services would not be considered cumulatively considerable. Cumulative impacts of the proposed Master Plan related to public services would be **less than significant**.

4.15.5 Mitigation Measures

Mitigation measures are not required because a significant impact has not been identified.

4.16.6 Level of Significance After Mitigation

All impacts would be less than significant without mitigation.

4.15.7 References

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4.16 Recreation

The following analysis identifies potential impacts to recreation resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing recreation resources of the proposed Master Plan area, discusses the regulatory setting, evaluates potential impacts to recreation, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts.

No comments related to recreation were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are provided in Appendix A.

4.16.1 Environmental Setting

4.16.1.1 Campus Facilities

Cal Poly Pomona maintains various outdoor quadrangles, courtyards, plazas, parks, open spaces, and active recreational facilities that provide opportunities for gathering places, student activities, organized events, and other academic uses.

The Association of Physical Plant Administrators has established six levels of grounds attention. When staffed and funded appropriately, Cal Poly Pomona Facilities Planning & Management Department's Landscape Services Division strives to achieve and maintain a Level 2, High level of maintenance, which is approximately 7 to 14 acres per 1.0 FTE staff. Under existing conditions, Cal Poly Pomona is only staffed and funded to maintain a Level 3, Moderate level of maintenance, or approximately 17 acres per 1.0 FTE staff.

Table 4.16-1 delineates each existing resource, its associated size by square footage and acres, and its current use type (passive, active, recreation, or open space).

Passive Recreation

On-campus passive open space that can be used for passive recreation under existing conditions, includes the W.K. Kellogg Arabian Horse Center (Building 29), the John T. Lyle Center for Regenerative Studies, the Voorhis Ecological Reserve, AGRIscapes Discovery Farm, and other areas of open space in the hillsides on the north and northwest of the main campus. Cal Poly Pomona maintains multiple passive recreational spaces throughout the campus, including University Quad, University Park, Japanese Garden, Rose Garden, BioTrek Ethnobotany Garden, Bronco Commons, Engineering Meadow, Voorhis Park, and The Park at 98. University Housing Services manage on-site open space for passive recreational use, including Residential Hall Lawn, Encinitas Hall Lawn, and Suites Courtyard. In addition, passive open space on campus includes Bronco Commons, which serves as an outdoor performance venue with a stage and a recreational field.

Active Recreation

On-campus active recreational facilities include the Bronco Recreation and Intramural Complex (BRIC) (Building 42), which operates both outdoor and indoor recreation. Outdoor facilities consist of a 10-lane recreational lap pool and leisure pool. Indoor facilities consist of five multipurpose rooms, a climbing wall, three basketball/volleyball courts, two racquetball courts, one multi-activity enclosed court, flexible fitness equipment space for cardio and strength

training, and an indoor track. In addition to the BRIC, the campus includes the Bronco Student Center (Building 35), which provides space for a Games Room and TV Lounge. Campus Athletics contain multiple on-campus active recreational facilities, including the Kellogg Gymnasium (Building 43), Darlene May Gymnasium (Building 41), Scolinos Baseball Field, Kellogg Track and Infield, a soccer field, and tennis courts. University Housing Services maintains on-campus facilities, such as an outdoor sand volleyball court, and the Montecito Hall Basketball Court.

Table 4.16-1. Existing Campus Open Space and Recreational Facilities

Facility Name	Approximate Square Feet	Approximate Acres
Passive Open Space		
AGRIscapes Discovery Farm	300,000	6.9
Voorhis Ecological Reserve	3,000,000	68.9
W.K. Kellogg Arabian Horse Center	2,498,815	57.36
John T. Lyle Center for Regenerative Studies	1,437*	0.03
Passive Recreational Space		
Engineering Meadow	76,000	1.7
BioTrek Ethnobotany Garden	30,000	0.7
Japanese Garden	34,000	0.8
Rose Garden	37,000	0.9
University Park	56,327	1.3
Voorhis Park	60,000	1.4
The Park at 98	12,194	0.3
Bronco Commons	67,000	1.5
University Quad	217,000	5.0
Suites Courtyard (Building 62)	14,978	0.3
Residential Hall Lawn (Building 74)	13,799	0.3
Encinitas Hall Lawn (Building 20)	31,269	0.7
Total Passive Space	**6,449,819**	**148.1**
Active Recreational Space		
Outdoor		
Bronco Recreation and Intramural Complex (BRIC) – Swimming Pools	—	—
Kellogg Track and Infield	130,000	3.0
Outdoor Basketball Courts and Surrounding Surface Space	16,000	0.4
Scolinos Baseball Field	123,000	2.8
Soccer Field/Open Recreational Field	494,000	11.3
Tennis Courts and Surrounding Surface Space	66,000	1.5
Indoor		
BRIC ▪ 5 multipurpose rooms ▪ Climbing wall with roped climbing and bouldering	119,382	2.7

Table 4.16-1. Existing Campus Open Space and Recreational Facilities

Facility Name	Approximate Square Feet	Approximate Acres
▪ 3 basketball/volleyball courts and 1 multi-activity court enclosed with partial height dasher boards ▪ flexible fitness equipment space for cardio and strength training track ▪ 2 racquetball courts		
Bronco Student Center	18,000	0.4
Darlene May Gym and Kellogg Gym	123,000	2.8
La Cienega Center (closed)	1,700	less than 0.1
Total Active Recreational Space	**1,091,082**	**24.9**

Source: Cal Poly Pomona 2011, 2024a and 2025.
* Square footage is only for the outdoor auditorium space.

A total of 173 acres of recreation and open space resources exists on campus. The existing network of park and open space facilities on the Cal Poly Pomona campus is generally available to the general public. Given the extensive amount of passive open space (i.e., the Voorhis Ecological Reserve), local community members often utilize these spaces for hiking and gathering spots. Cal Poly Pomona leases recreational fields to local soccer and little league organizations.

4.16.1.2 Local and Regional Parks

Off-campus parks surround the Cal Poly Pomona campus and are located within the cities of Pomona, Walnut, and San Dimas. Table 4.16-2, below identify parks within one mile of the campus. As shown below, approximately 15 acres of parkland are within the local vicinity of the Cal Poly Pomona campus.

Table 4.16-2. Local and Regional Parks

Facility Name	Location	Approximate Acres
Parks		
Kellogg Park	610 Medina Avenue, Pomona, California 91768	2.53
Cesar Chavez Park	2720 Barjud Avenue, Pomona, California 91768	1.07
Frank G. Bonelli Regional Park	120 East Via Verde Drive, San Dimas, California 91773	4.42
Snow Creek Park	21610 Snow Creek Drive, Walnut, California	7.00
	Total Park Space	**15.02**

Source: City of Pomona 2014a; DPR 2016; City of Walnut 2025

4.16.2 Regulatory Setting

4.16.2.1 Federal

There are no federal laws, regulations, plans, ordinances, or policies applicable to the proposed Master Plan related to recreation.

4.16.2.2 State

Quimby Act

California Government Code Section 66477, commonly known as the Quimby Act, was intended to help local communities generate the resources necessary to provide park and recreational facilities. The Quimby Act preserves open space and parkland in urbanizing areas of the state by authorizing local governments to establish ordinances that require private developers of new subdivisions to dedicate land for parks, pay an in-lieu fee, or a combination of the two. The Quimby Act was designed to ensure "adequate" open space acreage in jurisdictions adopting Quimby Act standards. The Act requires 3 acres of park area per 1,000 persons residing within a subdivision, unless the amount of existing neighborhood and community park area already exceeds that limit, in which case the City may adopt a higher standard not to exceed 5 acres per 1,000 residents. The Act requires that standards for recreational facilities be adopted in the local general plan recreation element if a parkland dedication/fee ordinance is to be enacted. The Quimby Act does not apply to the CSU, including Cal Poly Pomona, because Cal Poly Pomona is not a local government entity, does not assess fees from private developers, and is therefore exempt.

While the Quimby Act does not apply to the CSU system, standards under the Act are used as a proxy for what would constitute adequate park and recreational space for proposed Master Plan-related on-campus residents in the impact analysis presented in Section 4.16.4, Impacts Analysis.

4.16.2.3 Local

As a state entity, Cal Poly Pomona is not subject to local government permitting and planning regulations, policies or ordinances, such as the general plans and ordinances for the cities of Pomona and Walnut and the County of Los Angeles. However, local plans relating to parks and recreation are summarized below to provide context for the analysis of impacts to off-campus park and recreation facilities in Section 4.16.4, Project Impacts.

Los Angeles County 2035 General Plan Update – Parks and Recreation Element

The purpose of the Parks and Recreation Element of the Los Angeles 2035 General Plan update is to plan and provide for the existing and future development of the County's parks and recreation system for residents throughout the Los Angeles region. The County's park system, including facilities that are owned, operated, and maintained by the County, totals 69,594 acres. Parks and recreational resources throughout the County, and as described in the General Plan update, fall under two categories: Local Parks and Regional Parks. These categories are in addition to the various trails systems and indoor recreational facilities maintained by the County (Los Angeles County 2022). Frank G. Bonelli Regional Park is a regional park managed by the County's Department of Parks and Recreation.

City of Pomona General Plan Open Space Network Component

The Open Space Network Component of the 2014 City of Pomona General Plan Update identifies important local, regional resources and establishes guidelines for balancing the demands placed on the City's parks, open space, and recreational resources over the next 20 years. The City of Pomona currently provides approximately 1.3 acres of park space per 1,000 residents and has a goal of providing 3 acres of parkland per 1,000 residents (City of Pomona 2014b).

City of Walnut General Plan Conservation, Open Space, and Recreation Element

The City of Walnut Conservation, Open Space, and Recreation Element includes provisions and guidance for parks and recreational resources within the City. The City of Walnut General Plan establishes a parkland per resident ratio based on 2017 conditions (City of Walnut 2018). The city maintains a total of approximately 105 acres of existing and future parkland. As such, the City establishes a standard of 2.95 acres per 1,000 persons (City of Walnut 2018).

4.16.3 Thresholds of Significance and Methodology

4.16.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section 15064.7). The significance criteria used to evaluate the proposed Master Plan's impacts to recreation are based on CEQA Guidelines Appendix G. For the purposes of this project, a potentially significant impact to recreation would occur if the proposed Master Plan would:

1. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
2. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

4.16.3.2 Methodology

Potential impacts were assessed through a review of existing and proposed recreational space within the Cal Poly Pomona campus. The City of Pomona Draft 2011 General Plan Open Space Network Component, City of Walnut General Plan Environmental Resources Element, and County of Los Angeles General Plan Update 2035 Conservation and Open Space Element goals, policies, and service standards relative to parks and open space are also discussed. Although CSU is not subject to local community development plans, policies, and guidelines, these city and county goals and policies were used to provide context for the analysis of impacts to off-campus park and recreation facilities.

4.16.4 Impact Analysis

4.16.4.1 Project Impacts

Impact 4.16-1 **The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Additionally, the project would not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. (Less than Significant)**

Program-Level Analysis for the Master Plan

On-Campus Population

As concluded in the analysis related to Impact 4.15-1 (Parks) (Section 4.15, Public Services), adequate on-campus outdoor and indoor recreational space would be provided under the proposed Master Plan. Therefore, on-campus recreational facilities would accommodate the recreational needs of campus residents and the daily campus population. Given the adequacy of recreational facilities to serve the needs of campus residents and the daily campus population under the proposed Master Plan, and Cal Poly Pomona's responsibility for maintaining such facilities, the Master Plan would not be expected to result in substantial physical deterioration of on-campus recreational facilities. Additionally, given the adequacy of on-campus recreational facilities, the Cal Poly Pomona population is not expected to regularly use off-campus neighborhood parks in the areas surrounding the campus, as identified in Section 4.16.1. These neighborhood parks are dispersed from the campus, separated by roadways, and primarily contain limited amenities intended to serve their respective surrounding residential communities. Therefore, the on-campus residential and daily population associated with the proposed Master Plan would not result in substantial physical deterioration of on-campus recreational facilities or of nearby off-campus neighborhood parks and the impact would be **less than significant**.

Off-Campus Population

As also discussed in the analysis related to Impact 4.15-1 (Parks) (Section 4.15, Public Services), growth accommodated by the proposed Master Plan would result in an increase in total campus population of approximately 8,085 student headcount and 879 staff and faculty headcount, through the proposed Master Plan 2040 horizon year. On-campus housing is projected to increase by 1,040 net student beds. Therefore, the proposed Master Plan would result in an increase in students, faculty, and staff who would live off-campus. Housing for the anticipated increase in students, faculty and staff that are expected to live off-campus is likely comprised of a combination of already existing dwelling units and new units to be constructed in the future by unaffiliated third parties. Any prediction about the specific extent and location of the area's overall future housing patterns would be speculative, although a summary of planned housing projects in proximity to the campus is presented in Section 4.0, Environmental Analysis.

To the extent the population increase associated with the proposed Master Plan would reside off campus in already existing dwelling units, the Master Plan would not result in an increase in the use of parks and recreation facilities and, correspondingly, the Master Plan would not result in substantial physical deterioration of off-campus park and recreational facilities. As to any new housing that might indirectly result from the proposed Master Plan's increase in off-campus residential population, when new housing is built, fees for park and recreation facilities are typically

included in building permits as part of the jurisdiction's development fee impact program. Through the use and collection of development impact fees from private developers, any potential increases in the demand for public services associated with proposed Master Plan-related off-campus housing located in new housing tracts, including park and recreation facilities, would be addressed in the jurisdictions within which the new population resides. Such fees would provide for new or physically altered park and recreation facilities, if needed, to maintain park standards. Moreover, to the extent new housing is constructed in the future, that housing would undergo its own environmental review under CEQA. As part of the review, the need for new or expanded park and recreation facilities would be assessed and would be required to comply with applicable regulatory requirements and permits at the time that such park and recreation facilities are proposed. Additionally, to the extent that proposed Master Plan-related off-campus residents purchase existing or new homes, they would pay property taxes, which would support on-going maintenance of park and recreational lands in these jurisdictions.

Given the above, the proposed Master Plan-related off-campus population would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated, and the impact would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Near-term projects include new construction, renovation, demolition, mobility and circulation improvements, and utility infrastructure improvements. Renovation of the Darlene May Gymnasium (Building 41) and Title IX improvements to Kellogg Gymnasium (Building 43) are proposed as near-term projects. These projects are meant to accommodate growth associated with the proposed Master Plan and near-term projects. These recreational facilities, and the existing recreational facilities described in Section 4.16.1, would be adequate to serve the new student residents and the daily campus population associated with the near-term development components and the construction of additional facilities would not be required. Existing and new recreational facilities would be maintained by Cal Poly Pomona. Given the adequacy of the on-campus recreational facilities to serve the new population associated with the near-term development components, the Cal Poly Pomona population is not expected to regularly use off-campus neighborhood parks in the areas surrounding the campus. These neighborhood parks are relatively distant from the campus, separated by roadways, and primarily contain limited amenities intended to serve their respective surrounding residential communities. Therefore, the on-campus residential and daily population associated with the near-term projects would not result in substantial physical deterioration of on-campus recreational facilities or of nearby off-campus neighborhood parks and the impact would be **less than significant**.

As for off-campus impacts, given the limited scope of the near-term projects, the increased off-campus population associated with the near-term projects would not result in the need for additional recreational facilities or result in the use of off-campus neighborhood parks and, therefore, impacts would be **less than significant**.

4.16.4.2 Cumulative Impacts

Impact 4.16-2 The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to recreation. (Less than Significant)

On-Campus Population

New on-campus population associated with the proposed Master Plan would be adequately served by existing and proposed recreational facilities and open space on campus. Other cumulative growth outside the campus boundaries would not, in and of itself, require new recreational facilities on campus; although it is acknowledged that some local residents do use Cal Poly Pomona facilities. Accordingly, cumulative growth would not require construction of new on-campus parks and recreation facilities, beyond those analyzed in this EIR, and the cumulative impact would be **less than significant.**

Off-Campus Population

Off-campus cumulative projects and other cumulative growth could contribute to the need or use of park and recreational facilities in Pomona, Walnut, or the County of Los Angeles. The proposed Master Plan could incrementally contribute to such a need by resulting in new off-campus population that resides in off-campus housing units likely comprising a combination of already existing dwelling units and new units to be constructed in the future by unaffiliated third parties. Cumulative development would contribute to such a need by resulting in the development of new housing and new employment. Any prediction about the specific extent and location of the area's overall future housing patterns would be speculative, although a summary of planned housing projects in proximity to the campus is presented in Section 4.0, Environmental Analysis.

To the extent the off-campus population increase associated with the proposed Master Plan and cumulative development would reside in already existing dwelling units, such development would not result in an increase in demand for neighborhood parks, correspondingly, the proposed Master Plan and cumulative development would not require the use of parks and recreation facilities. As to any new housing that might indirectly result from the proposed Master Plan's increase in off-campus population and from population resulting from cumulative development, when new off-campus housing is built, fees for parks and recreation facilities are typically included in building permits as part of the jurisdiction's development fee impact program. Through the use and collection of development impact fees from private developers, any potential increases in the demand for public facilities associated with proposed Master Plan-related and other off-campus housing located in new housing tracts would be addressed in the jurisdictions within which the new population resides. Such fees would provide for new park and recreation facilities, if needed, to meet service standards and objectives. Moreover, to the extent new housing is constructed in the future, that housing would undergo its own environmental review under CEQA. As part of the review, the need for park and recreation facilities would be assessed and would be required to comply with applicable regulatory requirements and permits at the time that such facilities are proposed; any assessment of such future need at this time would be speculative. Therefore, the proposed Master Plan's impacts would not be cumulatively considerable relative to the provision of new park facilities to serve the proposed Master Plan's off-campus population and cumulative population growth, and cumulative impacts would be **less than significant**.

4.16.5 Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

4.16.6 Level of Significance After Mitigation

All impacts would be less than significant without mitigation.

4.16.7 References

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4.17 Transportation

The following analysis identifies potential impacts to transportation resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing transportation conditions in the proposed Master Plan area, discusses the regulatory setting, evaluates potential impacts to transportation, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts.

The analysis in this section is based in part on the following information:

- Technical assessment completed by Fehr & Peers in support of this DEIR
- Requirements outlined in the California State University Transportation Impact Study Manual (Updated January 2020).

Comments related to transportation were received during the public scoping period in response to the Notice of Preparation (NOP). Specifically, comments were received from Caltrans about preparation of a review of Vehicle Miles of Travel (VMT) and safety analysis at relevant freeway interchange ramp terminal intersections. The NOP and comments received in response are provided in Appendix A.

4.17.1 Environmental Setting

4.17.1.1 Study Area

The existing Cal Poly Pomona main campus is located partially in the incorporated cities of Pomona and Walnut, and the unincorporated area of the County of Los Angeles, California. The 860-acre main campus, which is the subject of the proposed Master Plan, is generally bounded by Interstate 10 Freeway (I-10) to the north, Valley Boulevard to the east, and West Temple Avenue to the south. The main campus includes Innovation Village, which occupies the southeastern portion east of South Campus Drive and north of West Temple Avenue, and University Village student housing, south of West Temple Avenue at Valley Boulevard. The main campus also includes International Polytechnic High School (I-Poly) in the south, a specialized, public, college-prep high school which has been in operation since 1993 through a ground lease with Cal Poly Pomona.

Figure 4.17-1 shows the location of the proposed Master Plan area and the surrounding transportation network.

4.17.1.2 Existing Transportation System

Freeways

Interstate 10 (I-10), the San Bernardino Freeway, runs east-west along the northern boundary of the campus with an exit at Kellogg Drive which provides access to the east side of the campus.

State Route 57 (SR-57), the Orange Freeway, is a north-south freeway that is located to the southeast of the Cal Poly Pomona campus. The freeway can be accessed from Temple Avenue, which provides direct access to the main Cal Poly Pomona campus.

State Route 60 (SR-60), the Pomona Freeway, is an east-west freeway in the vicinity of Cal Poly Pomona. The freeway can be accessed by traveling southeast along Temple Avenue to the SR-57 freeway; the SR-57 and SR-60 freeways converge approximately two miles south of the campus.

State Route 71 (SR-71), the Chino Valley Freeway, is a predominantly north-south freeway/highway located east of SR-57. The freeway can be used to access the campus by traveling on Temple Avenue, Valley Boulevard, and Pomona Boulevard.

Roadways

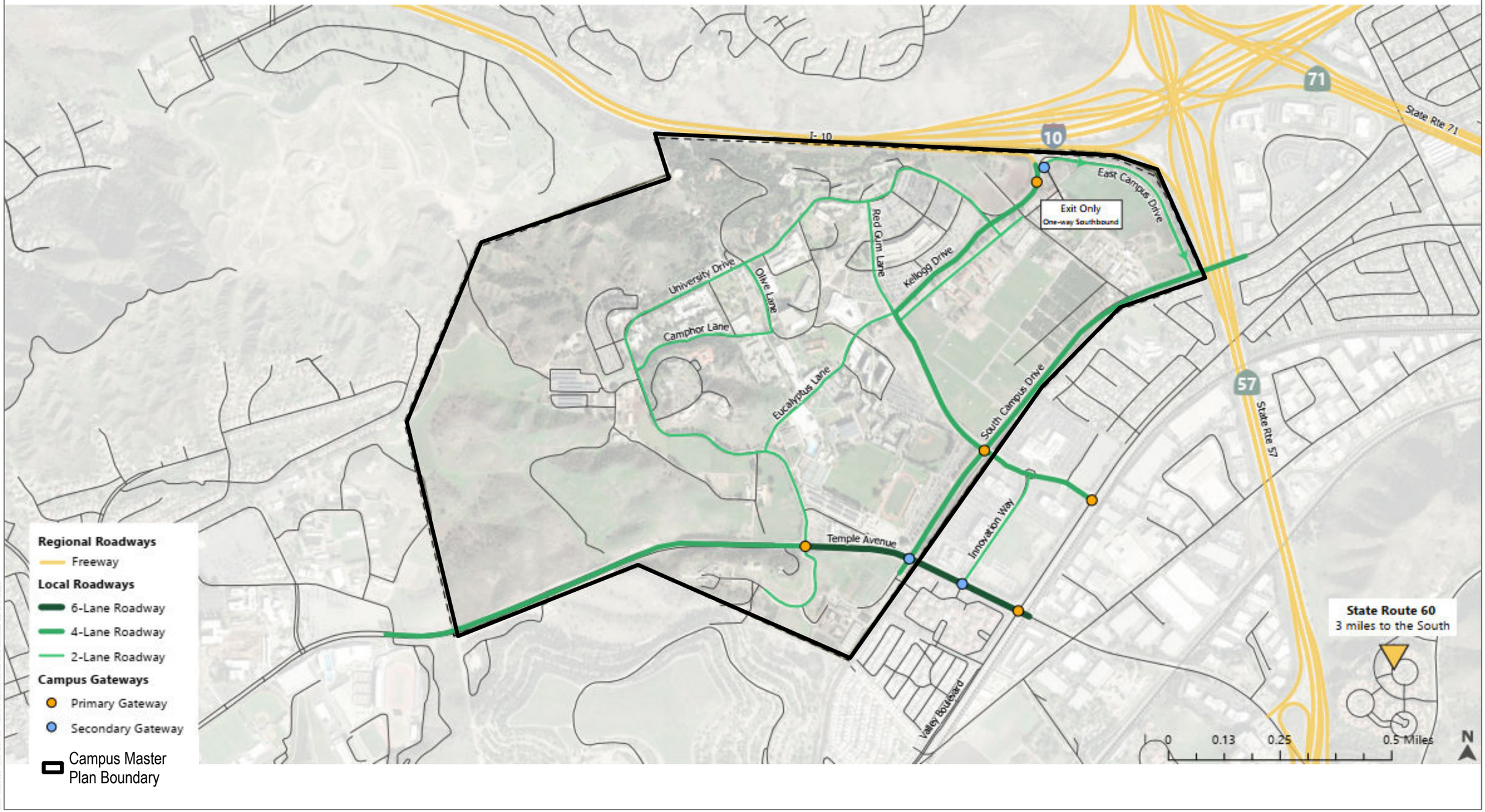
Temple Avenue is a four to six lane roadway that runs along the western edge of the campus with main intersections at University Drive and South Campus Drive. These are key entrances to the campus. The speed limit on this roadway is 45 mph. Sidewalks exist intermittently at the intersection with South Campus Drive and primarily provide for travel to off-campus housing and major bus stops. Temple Avenue is owned and maintained by the City of Pomona.

University Drive, a two-lane roadway, provides a loop around campus from Kellogg Drive to Temple Avenue. Speed limits on the roadway vary from 35 mph to warning signs with 15 mph limits. There are 24 marked crosswalks and multiple flashing crosswalk beacons on University Drive. University Drive contains multiple raised crosswalks; a traffic calming measure intended to slow vehicular traffic while providing pedestrians with enhanced crossing facilities. The raised crosswalks are marked by signage and roadway striping. LED raised pavement markers have been installed at popular crossings to increase driver awareness of pedestrians and bicyclists crossing. Between Camphor Lane and Red Gum Lane, the northbound direction on University Drive features a dedicated shuttle lane that also functions as a shared bike lane, allowing shuttles to bypass congestion and separating bicyclists from general traffic.

Kellogg Drive is a four-lane roadway and acts as the main gateway connecting Interstate 10 (I-10) and the Kellogg Interchange to South Campus Drive. The speed limit along Kellogg Drive is between 25 and 35 mph. Kellogg Drive contains Class IV protected bike lanes between Red Gum Lane and South Campus Drive, and a Class II bike lane between South Campus Drive and Valley Boulevard. One all-way stop-controlled intersection, one side-street stop-controlled intersection, and two signalized intersections exist on the roadway within the main campus.

Camphor Lane is a two-lane roadway between University Drive and the center of campus. On Camphor Lane, the accessible parking spaces are near the Campus Center Market Place and Cultural Center. Approaching the center of campus, the roadways end west of the University Library and transition to the Olive Lane Walk pedestrian mall walkway.

Eucalyptus Lane is a two-lane frontage road providing access to Citrus Lane and the W.K. Kellogg Arabian Horse Center from Kellogg Drive west of Red Gum Lane. East of Red Gum Lane, Eucalyptus Lane is primarily used for the pick-up and drop-off turn out, with secondary access to Bronco Way, Cal Poly Pomona Foundation and the Child Care Center Building (Building 116). Pavement between the turn out and Bronco Way has been decoratively stamped to signify that it is primarily a multi-modal mall (prioritizing pedestrians) that allows slow vehicles. The roadway provides access to the Student Center from University Drive. Eucalyptus Lane does not allow through traffic and is gate arm controlled past the Bronco Bookstore. The speed limit on this roadway is 15-25 mph.



SOURCE: FEHR PEERS

FIGURE 4.17-1

Transportation Network

Cal Poly Pomona Campus Master Plan EIR

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South Campus Drive is a four-lane roadway that connects Temple Avenue and East Campus Drive. The speed limit on this roadway is 45 mph. South Campus Drive contains a Class III bike route between Temple Avenue and Kellogg Drive, and Class II bike lanes from Kellogg Drive to East Campus Drive. The roadway is partially serviced by Bronco Express, the campus shuttle service, with a stop south of Temple Avenue outside the University Village apartments. The roadway is also serviced by Foothill Transit with a stop north of Temple Avenue. South Campus Drive is owned and maintained by the City of Pomona.

East Campus Drive is a two-lane roadway that connects South Campus Drive to Kellogg Drive. East Campus Drive is a one-way road, traveling eastbound away from the campus. The roadway's connection to South Campus provides a campus exit route for vehicles on Kellogg Drive east of Eucalyptus.

Red Gum Lane is a two-lane roadway that connects Kellogg Drive to South University Campus Drive. Red Gum Lane is closed to general traffic (besides parking lot access) but allows vehicle and campus shuttle access to the passenger pick-up/drop-off area at Voorhis Circle. The Red Gum Lane-Voorhis Circle connection directly links the pick-up/drop-off area to the campus internal pedestrian network via Olive Lane Walk.

Olive Lane is a two-lane roadway between University Drive and the center of campus. Olive Lane does not allow through traffic and is gate arm controlled past University Office Building (Building 94). Approaching the center of campus, the roadway ends at Camphor Lane and transitions to a pedestrian mall walkway.

Entry Points, Exit Points, and Gateways

Well established campus gateways provide reinforcement for university identity, provide wayfinding, and a sense of place for students, faculty, and staff. Campus gateways are located at major vehicular entries and offer few bicycle and pedestrian facilities. Cal Poly Pomona has formal markers along all its main gateways. Main gateways include:

- West Temple Avenue and South University Drive
- West Temple Avenue and Valley Boulevard
- Valley Boulevard and Kellogg Drive
- South Campus Drive and Kellogg Drive
- I-10 Ramps and Kellogg Drive

Secondary gateways are within the main gateways and serve most vehicles and pedestrians entering and exiting the campus. Secondary gateways at Cal Poly Pomona also include formal markers indicating arrival to the campus. Secondary gateways include:

- West Temple Avenue and South Campus Drive
- West Temple Avenue and Innovation Way
- Kellogg Drive and East Campus Drive (exit only)

Regional Transit Service

Transit services to Cal Poly Pomona and the City of Pomona are provided by Foothill Transit and the campus's shuttle service, the Bronco Express.

Foothill Transit provides multiple access points to the Cal Poly Pomona Campus. As of 2024, Foothill Transit operates eight (8) bus routes in and around the campus five or seven days a week with varying frequencies. The multiple bus lines running in the vicinity of the proposed Master Plan area are described in Table 4.17-1. There are multiple Foothill Transit stops located at the perimeter of the campus along Temple Avenue and South Campus Drive that service the routes, and a Silver Streak stop in front of the Student Services Building (Building 121) bus turnaround area, listed in Table 4.17-1.

Table 4.17-1. Foothill Transit Bus Routes Near Cal Poly Pomona

Line Number	Cities that are Serviced	Headways	Key Destinations
Line 190	El Monte, Baldwin Park, Covina, and Pomona	15 to 30 minutes	Covina Square Shopping Center, Kindred Hospital – San Gabriel Valley, Mt. San Antonio College, and Cal Poly Pomona
Line 194	El Monte, Industry, La Puente, Walnut, and Pomona	15 to 40 minutes	Five Points Plaza Shopping Center, Mt. San Antonio College, and Cal Poly Pomona
Line 195	Pomona	60 minutes	Pomona Community Center, Pomona Civic Center, Pomona Library, Cal Poly Pomona, I-Poly High School, and DeVry University Pomona
Line 289	Industry, Rowland Heights, Walnut, and Pomona	60 minutes	Eastwood Village Shopping Center, Mt. San Antonio College, Cal Poly Pomona, and I-Poly High School
Line 480	West Covina, Covina, Pomona, Montclair, and Claremont	30 to 40 minutes	Montclair Plaza, Claremont Colleges, Claremont Village, Pomona Library, Cal Poly Pomona, I-Poly High School, Bonelli Regional County Park, Mt. San Antonio College, Plaza West Covina, and Eastland Center
Line 482	Pomona, Diamond Bar, Walnut, Baldwin Park, Industry	30 minutes	Pomona Community Center, Pomona Civic Center, Pomona Library, DeVry University, Cal Poly Pomona, Bonelli Regional County Park, Diamond Bar Park & Ride, Farm Store at Kellogg Ranch, I-Poly High School, and Eastwood Village Shopping Center
Line 486	El Monte, La Puente, Valinda, Walnut, and Pomona	15 minutes	Cal Poly Pomona, I-Poly High School, Bonelli Regional County Park, Mt. San Antonio College, Industry Hills, and El Monte Expo Center
Silver Streak	Pomona, West Covina, Downtown Los Angeles	15 to 30 minutes	Downtown Pomona, Cal Poly Pomona (weekdays only), Westfield West Covina, El Monte Transit Center, Cal State Los Angeles, County USC, Union Station, Los Angeles City Hall, Los Angeles Central Library, LA Live, Crypto.com Arena, Los Angeles Convention Center

Source: Foothill Transit 2025.

Bronco Express, the campus shuttle service, has routes covering most of the major on-campus roadways, including: Red Gum Lane, Kellogg West Drive, Eucalyptus Lane, Horse Hill Drive, and main parking lots: F, J, B, and Parking Structure 1 and 2. As of 2024 fall semester, the Main Campus/Village shuttle operates Monday to Thursday between 7:30 AM and 11:00 PM with headways of 15 minutes. On Fridays, the Main Campus/Village shuttle

operates between 7:30 AM to 6:00 PM. The Main Campus/Village shuttle has 13 stops along the main campus, servicing high traffic areas such as the Student Services Building (Building 121), Innovation Village, and several parking facilities. The Bronco Express offers a route directly to the Pomona North Station. The Metrolink Connect Shuttle operates Monday to Friday with three departure times in the morning from Pomona North Station and three departure times in the afternoon and evening to Pomona North Station. The Bronco Express shuttle currently operates with 16 stops in total (Cal Poly Pomona 2025a).

OmniTrans is a public transit agency serving San Bernardino County providing fixed route, shuttle, and paratransit service. Omnitrans does not currently provide a direct route to the Cal Poly Pomona campus. Students, faculty, and staff that take OmniTrans must transfer at the Pomona Transit Center to access the campus. sbX Route 61 is an east/west Bus Rapid Transit (BRT) route that is proposed to have a western terminal station at the Pomona Transit Center. The proposed sbX Route 61 alignment will extend 19 miles and include 18 transit stations.

LA Metro is a public transit agency serving Los Angeles County providing fixed route, rail, rideshare, shuttle and paratransit service. Metro does not currently provide a direct route to the Cal Poly Pomona campus. Metro riders heading to the Cal Poly Pomona Campus must transfer to Foothill Transit routes 190, 194, or the Silver Streak route for direct service to the campus.

Metrolink has three stations that primarily service the Cal Poly Pomona campus, which include Downtown Pomona, Pomona North, and City of Industry stations. The Downtown Pomona and City of Industry stations are located approximately five to seven miles away from the center of the campus, and the Pomona North station is located approximately seven miles away from campus. As of January 2020, the Metrolink Connect Shuttle provides direct connection from the Pomona North station to the campus at no cost. This shuttle is a round-trip shuttle service with headways of one hour. The stop and pick-up location is located centrally to the campus at the Student Services Building (Building 121) where Bronco Express shuttles stop.

Amtrak has one station at Downtown-Pomona Station, the closest stop to the Cal Poly Pomona campus, with a limited three departure/arrival times per week. Foothill Transit Line 480 and Line 486 provide connections between the campus and the adjacent Pomona Transit Center.

Figure 4.17-2 shows the surrounding transit network of the proposed Master Plan area.

Pedestrian Network

There is good coverage of sidewalks and walkways on campus. However, major roads connecting to the campus such as Kellogg Drive, Temple Avenue, South Campus Drive and Valley Boulevard have no or limited sidewalks. University Drive has sidewalks only between Camphor Lane to the west and the residence halls to the northeast. Accessing the campus on foot is a challenge since the pedestrian crossings do not connect to other pedestrian facilities beyond the campus.

In general, the sidewalks are in good condition and provide access across campus and to major destinations, such as parking lots, transit stops, and classrooms. There are several customized signs for raised crosswalks along University Drive to encourage slower vehicle speeds. Figure 4.17-3 shows a campuswide pedestrian circulation diagram which illustrates major and secondary sidewalks that connect to and from popular areas and major parking lots.

There are high visibility crosswalks in multiple locations on campus. However, there are limited access points to enter the campus on foot. The following locations around the campus have pedestrian crossings:

- Temple Avenue and University Drive: High visibility crosswalk on north and east legs
- Temple Avenue and South Campus Drive: High visibility crosswalk all legs except west
- Kellogg Drive and South Campus Drive: High visibility crosswalk on all legs
- South Campus Drive and East Campus Drive: Standard crosswalk on west leg
- Eucalyptus Lane/Centerpointe Dining Hall: Rectangular Rapid Flashing Beacon (RRFB) lights at crosswalk

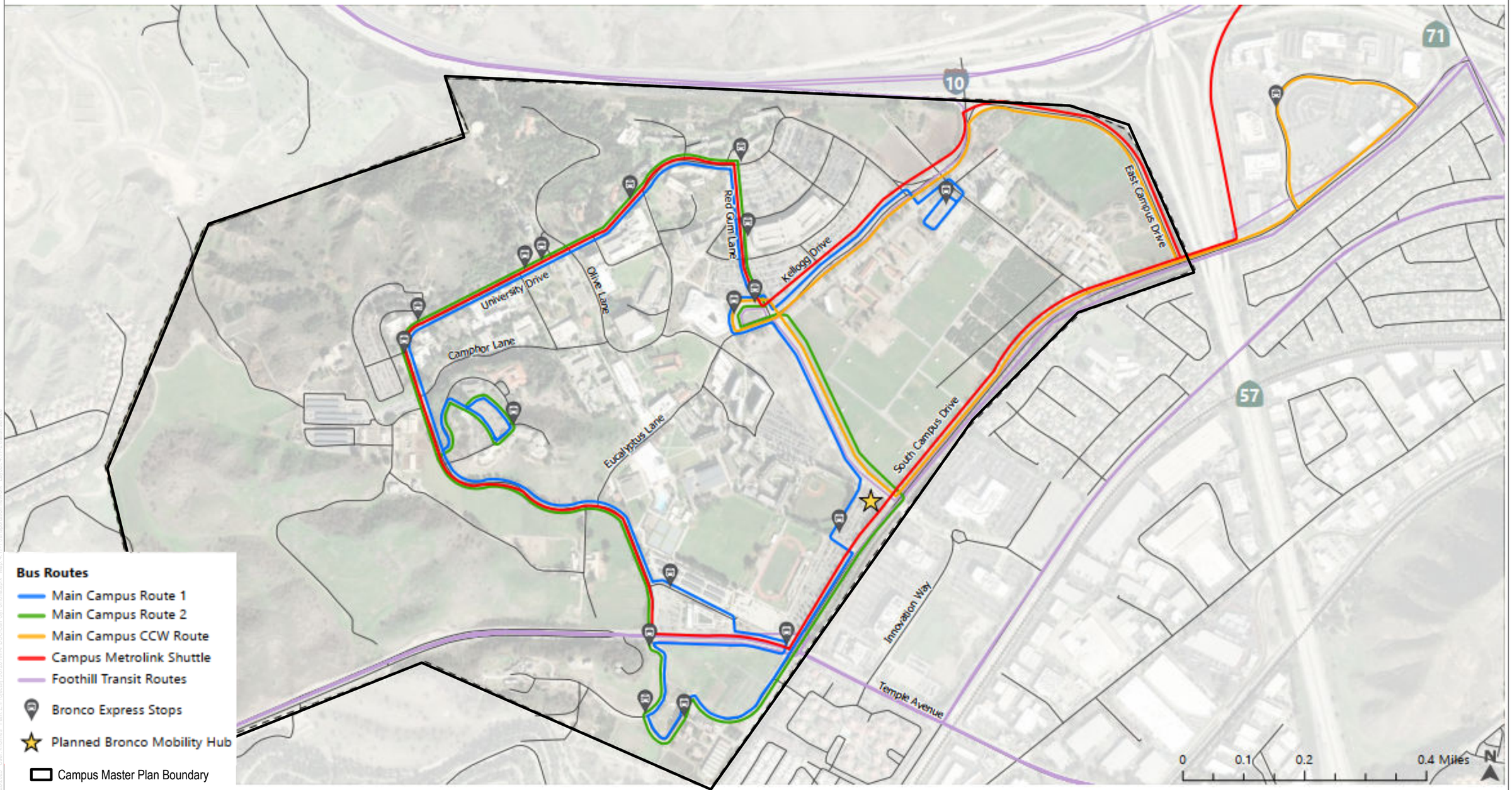
A pedestrian mall is a street that excludes vehicular traffic with the exception of service vehicles. The pedestrian mall can be found in the campus core. The campus has been expanding the pedestrian core with temporary solutions such as restricting vehicular access with card-controlled gate-arms. However, these strategies do not always keep the vehicles out and the current pedestrian malls at Eucalyptus Lane and a portion of Olive Lane Walk are not designed for an enhanced pedestrian experience.

During the past several years Cal Poly Pomona has been actively transitioning existing curb ramps to meet Americans with Disabilities Act (ADA) standards. Most of the pedestrian facilities on-campus are accessible to disabled persons. However, some existing crosswalks on campus do not meet current ADA standards. As ADA standards and requirements have increased over time, ADA facilities are typically improved concurrent with other projects and not addressed individually.

Bicycle Network

There are four existing bicycle facilities on campus (Cal Poly Pomona 2025b). A bike path runs from Parking Lot B to the core of the campus providing connectivity from South Campus Drive. The path provides cyclists easy access to the athletics fields, the residential suites, the Kellogg Gym and the Bronco Recreation and Intramural Complex (BRIC). However, the path abruptly finishes behind the Bronco Student Center (BSC). Additionally, when Kellogg Drive was realigned in 2021, a delineator protected bike lane, was installed on Kellogg Drive between Eucalyptus Lane and South Campus Drive. While this bike lane does provide safety advantages relative to the traditional bike lanes, the delineators can be damaged or removed and are not a barrier. There is an allocated lane exclusively for shuttle and bicycle use on University Drive between Camphor Lane and Red Gum. On Eucalyptus Lane past the gate-arm from Bronco Way to the Student Services Building (Building 121), there is a bike route marked by sharrows.

The City of Pomona completed a two-way protected bike lane in 2022 on Valley Boulevard that connects to the Kellogg bike lane. There are currently gaps in the bicycle network where the protected bike lanes are being constructed along Temple Avenue between Mount San Antonio College (Mt. SAC) and the main campus of Cal Poly Pomona. Buffered bike lane construction is currently underway on Temple Avenue to close some of the gaps to Cal Poly Pomona.



SOURCE: Fehr Peers

Note: The Campus Metrolink Route stops at the Pomona North Station before heading back to campus

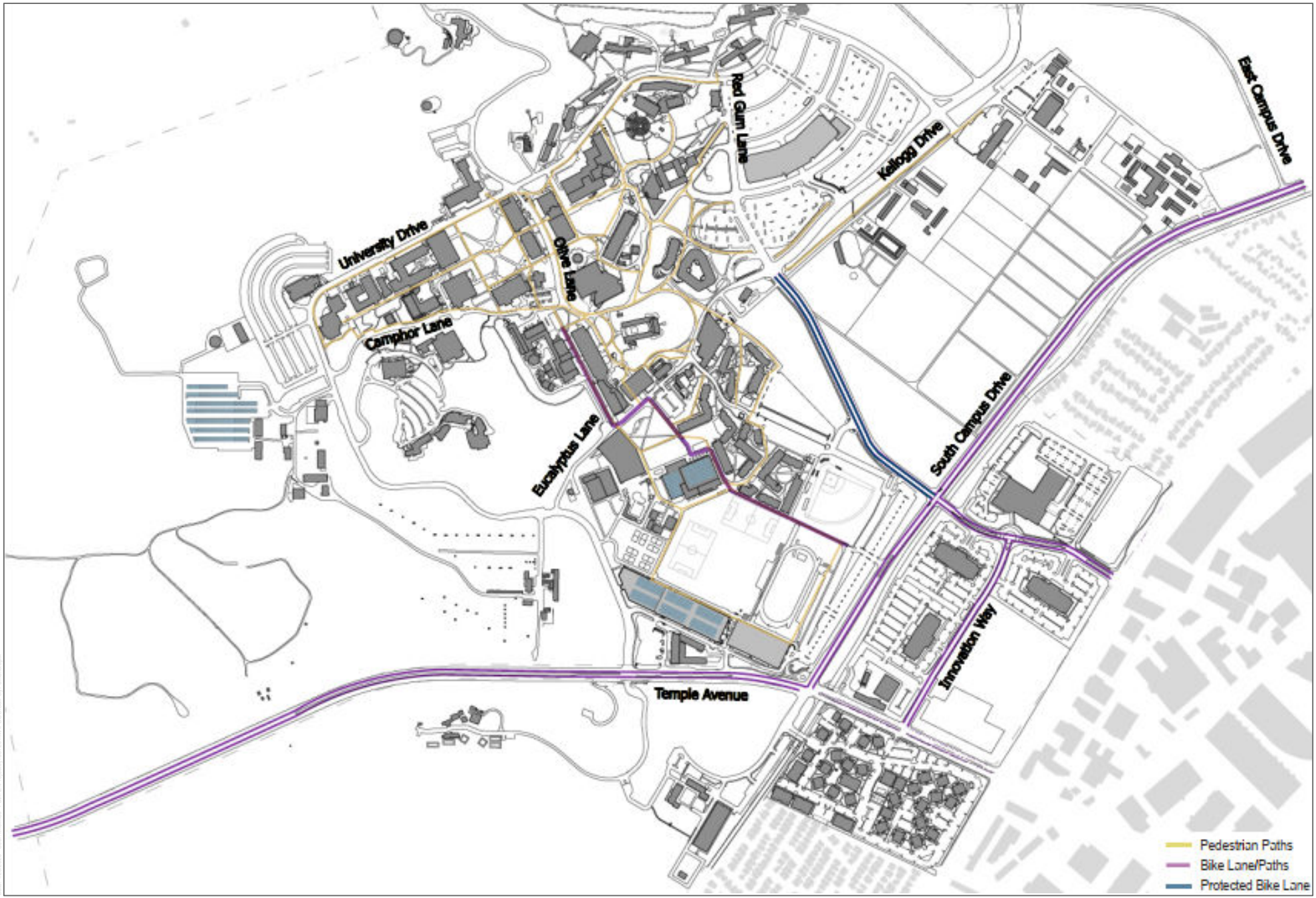
FIGURE 4.17-2

Transit Service Network

Cal Poly Pomona Campus Master Plan EIR

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SOURCE: California State Polytechnic University, Pomona 2024; FEHR PEERS

Cal Poly Pomona is in the process of auditing and updating their building information (names/numbers). There may be future inconsistences due to these changes.

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FIGURE 4.17-3

Existing Campus Bike and Pedestrian Network

Cal Poly Pomona Campus Master Plan EIR

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Parking

The main campus currently provides 14,258 permitted parking spaces, centered around two parking structures surrounded by surface parking lots. There are a total of 64 parking facilities serving the campus. Parking permits are required for all on-campus parking. Permits are $231 per semester per student and $68 per semester per faculty member. Rates for all are $8 daily for weekdays and $5 daily for weekends.

The California State University (CSU) Transportation and Parking Policy seeks to "meet the transportation needs of students, faculty, staff and visitors at its campuses with safe, equitable, and cost-effective options" (CSU 2025a). The CSU system and State Education Code 89701b(4), which requires that funds may only be allocated for parking after alternative methods of transportation have been investigated, requires universities to consider Transportation Demand Management (TDM) strategies as an alternative to providing new parking. In accordance with this policy, Cal Poly Pomona does not propose any net increase in parking spaces. Current and planned TDM measures are aimed at reducing parking demand on campus along with vehicle trips. Further details regarding the TDM Plan are provided below.

Safety

Local Road Collision Analysis

Collision Characteristics. A traffic collision is defined as any event where a vehicle strikes any object while moving. That object could be another car, a pedestrian, or something fixed in place like a light post. When collisions cause damage or injury or result in a fatality, the details are recorded by the local law enforcement agency and loaded into the California Highway Patrol Statewide Integrated Traffic Records System (SWITRS). Fehr & Peers analyzed SWITRS collision data prepared by the UC Berkeley SAFETREC Transportation Injury Mapping System (TIMS) database between October 2018 to September 2023. This data was filtered down to local roads bounded by the Interstate 10 Freeway (I-10) to the north, SR-57 to the east, and Sunset Crossing Road to the south to account for local roads used for campus access.

From 2018 to 2023, there were 77 total injury collisions, six of which involved pedestrians, three of which involved bicycles, and three vehicle-on-vehicle collisions with victims who were killed or severely injured (KSI). Some examples of injuries classified in KSI collisions can include broken bones, severe burns, traumatic brain injuries, and severe internal injuries. 22 of the 77 collisions occurred within campus right-of-way and the remaining occurred on the surrounding roadway network. Two of the three KSI collisions studied occurred within campus boundaries, One at Kellogg Drive and South Campus Drive, and One at University Drive and Temple Avenue. Pedestrians and bicyclists are involved in 11% (nine collisions) of the collisions studied. Four of the nine pedestrian or bicyclist involved collisions occurred within campus boundaries. There have been no pedestrian or bicycle involved KSI collisions on campus within the study range.

The three most common overall collision types near Cal Poly Pomona are:

- Broadside (36%)
- Rear End (31%)
- Hit Object (13%)

The three most common primary collision factors (PCF) in the area are:

- Unsafe Speed (27%)
- Improper Turning (22%)
- Vehicle Right of Way Violation (17%)

Table 4.17-2 and 4.17-3 fully detail type of crashes within the proposed Master Plan vicinity and primary collision factors within the Master Plan vicinity.

Table 4.17-2. Type of Crashes in Proposed Master Plan Vicinity (2018-2023)

Type of Crash	Quantity	Percentage of Total
Broadside	28	36.4%
Rear End	24	31.2%
Hit Object	10	13.0%
Head-On	5	6.5%
Sideswipe	4	5.2%
Vehicle/Pedestrian	4	5.2%
Overturned	1	1.3%
Not Stated	1	1.3%

Source: California Highway Patrol 2025.

Table 4.17-3. Primary Collision Factors in Proposed Master Plan Vicinity (2018-2023)

Type of Crash	Quantity	Percentage of Total
Unsafe Speed	21	27.3%
Improper Turning	17	22.1%
Vehicle Right-of-Way Violation	13	16.9%
Traffic Signals and Signs	12	15.6%
Unknown	4	5.2%
Pedestrian Right-of-Way Violation	3	3.9%
Driving or Biking Under the Influence	2	2.6%
Unsafe Lane Change	2	2.6%
Following Too Closely	1	1.3%
Pedestrian Violation	1	1.3%
Other than Driver or Pedestrian	1	1.3%

Source: California Highway Patrol 2025.

Collision Locations. The highest concentration of collisions is reported along Temple Avenue. Temple Avenue serves as a key connector to Valley Boulevard, which facilitates eastbound travel on local roads and provides a direct route to the ramps for State Route 71. Notably, there were eight collisions at Temple Avenue and Valley Boulevard, six at Temple Avenue and Pomona Boulevard, and five collisions at Temple Avenue and South Campus Drive, representing the top three intersection locations.

Of the eight collisions at Temple Avenue and Valley Boulevard, unsafe speed was the most common primary collision factor, with three collisions. One collision at this location involved a pedestrian, caused by the driver failing to yield at the crosswalk.

Of the six collisions at Temple Avenue and Pomona Boulevard, unsafe speed and traffic signals and signs (referring to the driver failing to stop at the line) were the most common primary collision factors, with two collisions associated with each. There was no pedestrian-involved collisions at this location.

Of the five collisions at Temple Avenue and South Campus Drive, improper turning was the most common primary collision factor, with three collisions. One collision at this location involved a pedestrian, caused by the driver failing to yield at the crosswalk.

This may be attributed to Temple Avenue's role as a primary access route in and out of the campus, causing higher volume and congestion on the road and potentially contributing to the elevated collision frequency at major intersections along this route. There are no other observed hot spots, with other collisions being dispersed around campus.

It should also be noted that TIMS data typically does not report on-campus collisions as Cal Poly Pomona Police Department keeps separate records, and in all instances not all collisions are reported. The collision data review was prepared primarily to respond to Caltrans comments regarding safety on the State Highway System.

Campus Collision Analysis

The Cal Poly Pomona Police Department also provided collision data for on-campus collisions. The data provides a summary of the location, date, and injury or non-injury status of each collision, but does not provide details on involved parties, injury severity, or the PCF. On-campus collisions occurring between October 2018 and September 2023 were analyzed.

Collision Characteristics. A total of 167 traffic collisions were reported by Cal Poly Pomona Police Department on or near the Cal Poly Pomona campus. Of these collisions, 45 (27%) involved injuries, while 122 (73%) were non-injury incidents. The highest number of annual collisions occurred in 2019, with 63 total reports. This was followed by a sharp decline to 16 in 2020, likely reflecting reduced campus activity during the COVID-19 pandemic. Since then, the annual number of collisions has gradually risen, reaching 26 in 2023, though still below the pre-pandemic peak.

Collision Locations. During the analysis period, the Kellogg Drive and University Drive intersection had nine total reported collisions, the highest amongst other recorded locations. The second most collision-prone location was Temple Avenue and University Drive, with seven total collisions. South Campus Drive and Temple Avenue and Kellogg Drive and South Campus Drive each had four reported collisions. Injury collision locations revealed similar patterns. Kellogg Drive and University Drive again accounted for the location with the highest injury collisions, with four recorded injury collisions. Kellogg Drive and South Campus Drive followed with three recorded injury collisions.

Both Kellogg Drive and Temple Avenue play key roles in the campus circulation system. Kellogg Drive connects the traffic from the I-10 to the north with the main campus and parking facilities. Temple Avenue is also a key route for the campus, functioning as a connector and access point. The Kellogg Drive and Temple Avenue corridors accommodate both non-students using them as connectors and campus-bound vehicles daily. The frequency of collisions at specific points along these routes reflect their high operational demand and usage within the broader campus transportation network.

Caltrans Highway Ramp Collision Analysis

Collision Characteristics. Collision analysis was conducted for interchanges where the proposed Master Plan was forecast to add 50 or more peak hour trips. Traffic Accident Surveillance and Analysis System (TASAS) data collected between October 2018 and September 2023 was provided by Caltrans at the following interchanges:

- Fairplex Drive/I-10 Westbound Ramps
- Kellogg Drive/I-10 Westbound Ramps
- Kellogg Drive/I-10 Eastbound Ramps
- South Campus Drive/I-10 Eastbound Ramps
- Temple Avenue/SR-57 Southbound Ramps
- Temple Avenue/SR-57 Northbound Ramps
- Holt Avenue/SR-71 Southbound Ramps

Caltrans collision analysis was completed according to standard comparison to average collision rates at similar ramps. Table 4.17-4 presents a summary of collision rates by collision severity reported as number of collisions per million vehicle-miles. Table 4.17-5 presents a summary of type of crashes on the studied on-ramps. Table 4.17-6 presents a summary of the primary collision factors on the on-ramps studied.

Overall, the most common collision types at the studied interchanges are:

- Hit Object (39%)
- Rear-End (21%)
- Sideswipe (21%)

Overall, the most common primary collision factors are:

- Speeding (42%)
- Improper Turning (22%)
- Other Violations (17%)

Table 4.17-4. Collision Rates by Collision Severity (2018-2023)

Location	Post Mile Marker	Actual Fatal	Actual Fatal + Injury	Actual Total	Average Fatal	Average Fatal + Injury	Average Total
Eastbound Interstate 10							
I-10 EB Off-Ramp to Kellogg Drive	41.85	0	0.15	0.46	0.006	0.31	0.90
I-10 EB On-Ramp from South Campus Drive	42.499	0	0	0.12	0.002	0.23	0.63
Westbound Interstate 10							
I-10 WB On-Ramp from Kellogg Drive	41.986	0	0	0.18	0.002	0.23	0.63

Table 4.17-4. Collision Rates by Collision Severity (2018-2023)

Location	Post Mile Marker	Actual Fatal	Actual Fatal + Injury	Actual Total	Average Fatal	Average Fatal + Injury	Average Total
I-10 WB Off-Ramp to Kellogg Drive	42.32	0	0.14	0.82	0.003	0.38	1.04
I-10 WB On-Ramp from Fairplex Drive	43.525	0	**0.26**	0.43	0.002	0.23	0.63
I-10 WB Off-Ramp to Fairplex Drive	44.147	0	0.09	**1.09**	0.003	0.38	1.04
Northbound State Route 57							
SR-57 NB On-Ramp from Westbound Temple Avenue	6.351	0	0.1	0.59	0.004	0.23	0.7
SR-57 NB On-Ramp from Eastbound Temple Avenue	6.162	0	**0.83**	**4.16**	0.002	0.23	0.77
SR-57 NB Off-Ramp to Temple Avenue	5.792	0	0.1	0.88	0.003	0.38	1.04
Southbound State Route 57							
SR-57 SB On-Ramp from Westbound Temple Avenue	6.276	0	0	0	0.002	0.23	0.77
SR-57 SB On-Ramp from Eastbound Temple Avenue	5.972	0	0.16	**0.82**	0.004	0.23	0.7
SR-57 SB Off-Ramp to Temple Avenue	6.489	**0.074**	0.22	0.81	0.003	0.38	1.04
Southbound State Route 71							
SR-71 SB On-Ramp from Holt Avenue/Valley Boulevard	R001.452	0	**0.36**	**0.89**	0.002	0.26	0.76
SR-71 SB On-Ramp from Eastbound Holt Avenue/Valley Boulevard	T001.668	0	0	0	0.004	0.23	0.7
SR-71 SB Off-Ramp to Holt Avenue/Valley Boulevard	R001.291	0	0	0.61	0.003	0.38	1.04

Source: California Highway Patrol 2025.
Notes:
1 Collision rates of each ramp are compared to average collision rates at similar ramps as determined by Caltrans.
2 Collision rate reported as number of collisions per million vehicle-miles.
3 Values in **bold** indicate the average collision rate observed is higher than the corresponding state average.

Table 4.17-5. Collision Types at Ramps (2018-2023)

Location	Post Mile Marker	Total Collisions	Head-On	Side-swipe	Rear-End	Broad-side	Hit Object	Over-Turn	Auto-Ped
Eastbound Interstate 10									
I-10 EB Off-Ramp to Kellogg Drive	41.850	3	0%	0%	0%	0%	100%	0%	0%
I-10 EB On-Ramp from South Campus Drive	42.499	1	100%	0%	0%	0%	0%	0%	0%
Westbound Interstate 10									
I-10 WB On-Ramp from Kellogg Drive	41.986	1	0%	0%	0%	0%	100%	0%	0%
I-10 WB Off-Ramp to Kellogg Drive	42.320	6	0%	33%	17%	17%	33%	0%	0%
I-10 WB On-Ramp from Fairplex Drive	43.525	5	0%	40%	60%	0%	0%	0%	0%
I-10 WB Off-Ramp to Fairplex Drive	44.147	12	17%	25%	17%	17%	25%	0%	0%
Northbound State Route 57									
SR-57 NB On-Ramp from Westbound Temple Avenue	6.351	6	0%	33%	17%	17%	17%	17%	0%
SR-57 NB On-Ramp from Eastbound Temple Avenue	6.162	25	8%	4%	0%	0%	80%	8%	0%
SR-57 NB Off-Ramp to Temple Avenue	5.792	9	0%	33%	22%	33%	11%	0%	0%
Southbound State Route 57									
SR-57 SB On-Ramp from Westbound Temple Avenue	6.276	0	0%	0%	0%	0%	0%	0%	0%
SR-57 SB On-Ramp from Eastbound Temple Avenue	5.972	5	0%	60%	0%	0%	40%	0%	0%
SR-57 SB Off-Ramp to Temple Avenue	6.489	22	5%	18%	45%	5%	18%	5%	5%
Southbound State Route 71									
SR-71 SB On-Ramp from Holt Avenue/ Valley Boulevard	R001.452	5	0%	0%	0%	0%	80%	20%	0%
SR-71 SB On-Ramp from Eastbound Holt Avenue/Valley Boulevard	T001.668	0	0%	0%	0%	0%	0%	0%	0%
SR-71 SB Off-Ramp to Holt Avenue/Valley Boulevard	R001.291	7	0%	29%	43%	14%	14%	0%	0%

Source: Caltrans 2025.

Notes:
"Other" and "Not Stated" accident types were of no recorded occurrence and not provided in table.

Table 4.17-6. Primary Collision Factors at Ramps (2018-2023)

Location	Post Mile Marker	Total Collisions	Influence of Alcohol	Improper Turning	Speeding	Other Violation	Other than Driver	Unknown
Eastbound Interstate 10								
I-10 EB Off-Ramp to Kellogg Drive	41.85	3	0%	0%	100%	0%	0%	0%
I-10 EB On-Ramp from South Campus Drive	42.499	1	0%	0%	0%	0%	0%	100%
Westbound Interstate 10								
I-10 WB On-Ramp from Kellogg Drive	41.986	1	0%	100%	0%	0%	0%	0%
I-10 WB Off-Ramp to Kellogg Drive	42.320	6	33%	33%	17%	17%	0%	0%
I-10 WB On-Ramp from Fairplex Drive	43.525	5	0%	20%	60%	20%	0%	0%
I-10 WB Off-Ramp to Fairplex Drive	44.147	12	0%	8%	17%	33%	8%	33%
Northbound State Route 57								
SR-57 NB On-Ramp from Westbound Temple Avenue	6.351	6	17%	17%	33%	17%	0%	17%
SR-57 NB On-Ramp from Eastbound Temple Avenue	6.162	25	0%	24%	76%	0%	0%	0%
SR-57 NB Off-Ramp to Temple Avenue	5.792	9	0%	33%	22%	11%	33%	0%
Southbound State Route 57								
SR-57 SB On-Ramp from Westbound Temple Avenue	6.276	0	0%	0%	0%	0%	0%	0%

Table 4.17-6. Primary Collision Factors at Ramps (2018-2023)

Location	Post Mile Marker	Total Collisions	Influence of Alcohol	Improper Turning	Speeding	Other Violation	Other than Driver	Unknown
SR-57 SB On-Ramp from Eastbound Temple Avenue	5.972	5	0%	40%	20%	20%	0%	0%
SR-57 SB Off-Ramp to Temple Avenue	6.489	22	9%	18%	32%	32%	0%	9%
Southbound State Route 71								
SR-71 SB On-Ramp from Holt Avenue/Valley Boulevard	R001.452	5	0%	40%	60%	0%	0%	0%
SR-71 SB On-Ramp from Eastbound Holt Avenue/Valley Boulevard	T001.668	0	0%	0%	0%	0%	0%	0%
SR-71 SB Off-Ramp to Holt Avenue/Valley Boulevard	R001.291	7	0%	14%	29%	29%	0%	29%

Source: Caltrans 2025.
Notes:
[1] "Following too close", "Failure to yield", "Improper driving", "Fell asleep", and "Not stated" factors were of no recorded occurrence and not provided in table.

Above Average Collision Rates. The Northbound SR-57 On-Ramp from Eastbound Temple Avenue "Actual Fatal + Injury Collision Rate" is 0.60 crashes per million vehicles higher than the "Average Fatal + Injury Collision Rate." The "Actual Total Rate" for this location is 3.39 crashes per million vehicles higher than the "Average Total Rate."

The Southbound SR-57 Off-Ramp to Temple Avenue "Actual Fatal Collision Rate" is 0.07 crashes per million vehicles higher than the "Average Fatal Collision Rate".

The Southbound SR-71 On-Ramp from Holt Avenue/Valley Boulevard is 0.10 crashes per million vehicles higher than the "Average Fatal + Injury Collision Rate." The "Actual Total Rate" for this location is 0.13 crashes per million vehicles higher than the "Average Total Rate."

Collision Locations. The three ramps with the highest incidence of collisions are the Northbound SR-57 On-Ramp from Eastbound Temple Avenue, the Southbound SR-57 Off-Ramp to Temple Avenue, and the Westbound I-10 Off-Ramp to Fairplex Drive, with 25, 22, and 12 collisions, respectively.

The most common primary collision factor at the Northbound SR-57 On-Ramp from Eastbound Temple Avenue was speeding, accounting for 19 out of 25 collisions recorded.

The two most common primary collision factors at the Southbound SR-57 Off-Ramp to Temple Avenue were speeding and "other violations," with seven collisions for each out of 22 collisions recorded.

The two most common primary collision factors at the Westbound I-10 Off-Ramp to Fairplex Drive was "other violations" and "unknown," accounting for four collisions for each out of 12 collisions recorded.

Transportation Demand Management

Cal Poly Pomona currently implements a variety of TDM measures to reduce reliance on single occupancy vehicle travel for the campus population and manage peak parking demand on campus. Existing measures include:

- Discounts on Metrolink tickets for students
- Free Metrolink Shuttle service that connects Pomona North Metrolink Station to/from campus
- Bike racks throughout campus and access to a 24-hour bike cage
- Foothill Transit and Metro bus pass discounts for students taking transit to campus
- Foothill Transit Class Pass Program, offering free student transit passes to eligible students
- Rideshare Office connecting students, faculty, and staff for rideshare needs
- Preferential parking for rideshare program participants
- Employee vanpool program
- Reimbursements for rideshare members, vanpool drivers, bus riders, Metrolink riders, and Amtrak riders

Moving forward, Cal Poly Pomona plans to increase investments in TDM and expand the current TDM strategies. Ten priority TDM strategies have been identified to support Cal Poly Pomona's planned development as listed below.

1. Incentives Program
2. Convenient/Accessible Facilities
3. Transit Initiatives (campus mobility hub)
4. Comprehensive App
5. Branded Education and Outreach Program with an On-Campus Resident Program
6. Shared Mobility
7. Transportation Network Improvements
8. Parking Management
9. Telecommuting
10. Campus Planning

These priority strategies encompass multiple TDM measures, implementation strategies, and co-benefits associated with each priority strategy.

Emerging Transportation Technology and Travel Options

Advancements in transportation technology and shifting mobility trends are transforming how people navigate everyday life. These trends, some of which have become established during the COVID-19 pandemic, provide greater flexibility and efficiency for students and faculty alike. Some technologies influencing travel behavior include the following:

- Remote learning and virtual workplaces: Remote options for students and faculty translate into fewer trips to campus. Platforms like Zoom and Microsoft Teams allow students to attend lectures and access resources remotely, minimizing transportation demand and improving accessibility for commuter students.
- Food delivery services: The increased usage of apps like DoorDash and UberEats may shift on-campus dining habits, reducing foot traffic to dining areas and increasing delivery trips. The campus has the opportunity to implement autonomous food delivery robots or provide dedicated pick-up zones to streamline food delivery demand.
- Artificial intelligence: The introduction of real-time tracking apps, AI-assisted trip planning, and other transit-related technologies are an opportunity for Cal Poly Pomona to further optimize the planned Bronco Mobility Hub to further ease alternative transportation to and on campus.

4.17.2 Regulatory Setting

4.17.2.1 Federal

Americans with Disabilities Act

Titles I, II, III, and IV of the Americans with Disabilities Act (ADA) have been codified in title 42 of the United States Code, beginning at Section 12101. Title III prohibits discrimination based on disability in “places of public accommodation” (businesses and non-profit agencies that serve the public) and “commercial facilities” (other businesses). The regulation includes Appendix A to Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. The ADA requires public transit operators to meet its requirements. Transit facilities, intermodal centers, rail stations, and platforms must meet accessibility standards as set by the U.S Department of Transportation (USDOT). Accessibility standards regulate paths of travel, bus stops and shelters, curb ramps, grade crossings, parking areas, passenger drop-off areas, platform edges, etc.

4.17.2.2 State

Senate Bill 743

As previously noted, Senate Bill (SB) 743 changed how transportation impacts are analyzed under CEQA. SB 743 removed the use of automobile delay or traffic congestion as measured by Level of Service (LOS) for determining transportation impacts in environmental review. Instead, the CEQA Guidelines now specify that vehicle miles traveled, or VMT, is the appropriate metric to evaluate transportation impacts. In short, SB 743 changes the focus of transportation impact analysis in CEQA from measuring impacts to drivers, to measuring the impact of driving.

SB 743, which is codified in Public Resources Code (Cal. Pub. Resources Section 21099), required changes to the guidelines implementing CEQA (CEQA Guidelines) regarding the analysis of transportation impacts and the metric

upon which to assess those impacts. Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." Section 21099 also provides that following the certification of the CEQA Guidelines implemented pursuant to SB 743, "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" pursuant to CEQA.

The legislation directed the State of California's Office of Land Use and Climate Innovation (LCI), formerly the Office of Planning and Research, to look at different metrics for identifying transportation impacts and make corresponding revisions to the CEQA Guidelines. Following several years of draft proposals and related public comments, LCI settled upon VMT as the preferred metric for assessing passenger vehicle-related impacts and issued revised CEQA Guidelines in December 2018, along with a Technical Advisory on Evaluating Transportation Impacts in CEQA (LCI Technical Advisory) (OPR 2018) to assist practitioners in implementing the CEQA Guidelines revisions to use VMT as the new metric (see further information below). Under the revised Guidelines, vehicle LOS is no longer to be used as a determinant of significant environmental impacts, and an analysis of a project's impacts relative to VMT is the new metric against which significant impacts are to be assessed. As explained below, in the Winter of 2020, CSU issued its California State University Transportation Impact Study Manual (CSU 2020), which provides a methodology, including significance thresholds, for assessing a project's impacts in terms of VMT.

Land Use and Climate Innovation Technical Advisory

The LCI Technical Advisory, identified previously, is one in a series of advisories provided by LCI as a service to professional planners, land use officials, and CEQA practitioners. This advisory contains technical recommendations regarding the assessment of VMT-related impacts, thresholds of significance, and mitigation measures. LCI issues technical assistance on issues that broadly affect the practice of land use planning and CEQA (Pub. Resources Code, Section 21000 *et seq*.). (Ca. Gov. Code, Section 65040, subds. (g), (l), (m).) The purpose of the OPR Technical Advisory document is to provide advice and recommendations, which lead agencies and other entities may use at their discretion. The document does not alter lead agency discretion in preparing environmental documents subject to CEQA and the document should not be construed as legal advice.

California State University Transportation Impact Study Manual

As previously noted, in response to the methodological change in required transportation analysis initiated by SB 743, the CSU Board of Trustees issued the 2020 California State University Transportation Impact Study Manual (CSU TISM), which supersedes the 2012 CSU TISM. The 2020 CSU TISM provides guidance for the preparation of CEQA-compliant transportation impact analysis pursuant to SB 743 and is the operative TISM for the analysis presented here. See Section 4.17.3 for additional information about the methods used in the VMT analysis contained in this section, based on the TISM.

PolicyStat

PolicyStat guidelines require that individual CSU building projects be reviewed by the CSU Office of Fire Safety involving a plan review and approval followed by periodic filed inspections concluding with issuance of a certificate of occupancy to provide for adequate emergency access and building safety features.

California State University Transportation Demand Management Manual

The CSU TDM Manual (CSU 2012) addresses the unique transportation needs of different campuses and provides a system-wide framework for implementing sustainable transportation programs. The manual contains a set of goals, criteria, and best practices to guide the provision of programs, tools, and strategies that encourage students, faculty and staff to commute to and from campus via bus/rail transit, carpools, vanpools, bicycling and walking to lessen reliance upon single-occupant vehicle travel and reduce vehicle trips to campuses (CSU 2012). This manual is a resource designed to provide guidance in developing campus TDM plans and the associated programs and policies.

California State University Transportation and Parking Policy

The California State University Transportation and Parking Policy includes guidelines and procedures for parking and transportation on CSU campuses. The policy requires campuses to establish an Alternative Transportation Committee and develop a Transportation Demand Management Plan to reduce mobility challenges.

CSU Emergency Management

The CSU standards also include compliance with the CSU Emergency Management policy, which states, "This policy requires each campus to develop and maintain an emergency management program that can be activated when a hazardous condition, natural or man-made disaster reaches, or has the potential for reaching, proportions beyond the capacity of routine campus operations." The CSU Emergency Management policy also mandates campus Emergency Action Plans must include procedures for emergency evacuation, following compliance with CalOSHA requirements. The plan must include procedures to account for all employees after an emergency evacuation. The Emergency Operations Plan (EOP) (Cal Poly Pomona 2021) incorporates and coordinates all emergency personnel of the University to support emergency operations, and includes coordination with the County of Los Angeles Office of Emergency Management and California Governor's Office of Emergency Services.

California State University Owner Controlled Insurance Program (CSU OCIP) Safety Manual

The CSU OCIP Safety Manual was developed to ensure proactive safety processes are used on CSU construction projects. The prime contractor or subcontractor of any tier on this proposed Master Plan shall have a goal to prevent injuries to all employees and the downtime associated with incidents and accidents. The requirements of Cal/OSHA, state and local ordinances and this manual establish the guidelines that safety and loss prevention programs must meet or exceed.

Cal Poly Pomona Transportation Demand Management Plan

The Cal Poly Pomona TDM Plan was developed to provide more Campus transportation options, make active transportation modes more accessible and equitable, and to decrease the Single Occupant Vehicle (SOV) travel and parking demand on Campus. The Plan sets out to fundamentally shift the Campus commuter culture by reducing reliance on the personal automobile. The overarching goal of The Plan is to promote walking, biking, transit, and other forms of alternative transportation as attractive, convenient, safe, and practical means for Campus trips. The following key goals and objectives were established by the project team to guide the development of the TDM Plan:

- Implement Master Plan Vision
- Advance student success

- Reduce trips to/from Campus
- Reduce VMT and congestion
- Reduce parking demand/right-size parking
- Increase active mode share

Cal Poly Pomona Climate Action Plan (CAP)

The Cal Poly Pomona CAP outlines the university's strategy to achieve carbon neutrality by 2030. The following actions were developed related to transportation:

- Minimize fossil fuel consumption by 60% through increasing vehicle and equipment efficiency
- Reduce commuting trips to campus by 30%
- 50% of campus population use alternatives to single-occupancy vehicles to commute on a daily basis

California Department of Transportation

California Department of Transportation (Caltrans) is the public agency responsible for designing, building, operating, and maintaining California's State highway system, which consists of freeways, highways, expressways, toll roads, and the area between the roadways and property lines. Caltrans is also responsible for permitting and regulating the use of State roadways.

Caltrans Vehicle Miles Traveled-Focused Transportation Impact Study Guide

The VMT Transportation Impact Study Guide outlines how Caltrans will review land use projects with a focus on supporting state land use goals, state planning priorities, and greenhouse gas (GHG) emissions reduction goals. The VMT Transportation Impact Study Guide endorses the Technical Advisory on Evaluating Transportation Impacts in CEQA. The Technical Advisory serves as the basis for transportation impact analysis methodology and thresholds including the use of screening to streamline qualified projects because they help achieve the state's VMT/GHG reduction and mode shift goals.

Caltrans Local Development Review Safety Review Practitioner's Guidance

Caltrans requires review of land use projects that affect the State Highway System to consider impacts related to safety. Caltrans developed Local Development Review (LDR) Safety Review Practitioner's Guidance in 2024 which contains guidance on how to evaluate potential safety impacts for proposed land use projects affecting the State Highway System. This guidance largely focuses on the actions of Caltrans district staff in performing the analysis and providing relevant impact information to lead agencies. The interim guidance recommends that safety analyses include a review of three primary elements related to transportation safety: design standard compliance, collision history, and collision risk (consistent with the Federal Highway Administration's Systemic Approach to Safety). The interim guidance does not establish specific analysis methods or significance thresholds for determining safety impacts under CEQA. Additionally, Caltrans notes that local agencies may use the interim guidance at their own discretion as a guide for review of local facilities.

Caltrans Complete Streets Directive

Caltrans enacted *Complete Streets: Integrating the Transportation System* (Complete Streets Directive) in October 2008, which required cities to plan for a "balanced, multimodal transportation network that meets the needs of all users of streets." A complete street is a transportation facility that is planned, designed, operated, and maintained

to provide safe mobility for all users, including bicyclists, pedestrians, transit vehicles, trucks, and motorists, appropriate to the function and context of the facility. Every complete street looks different, according to its context, community preferences, the types of road users, and their needs.

4.17.2.3 Regional

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

The 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as "Connect SoCal" was adopted in April 2024 and is prepared by Southern California Association of Governments (SCAG) for the six-county SCAG region. This long-range transportation plan (approximately 20-year horizon) projects population and employment growth and defines the vision and overall goals for the regional multimodal transportation system. The RTP identifies future transportation infrastructure needs and defines planned multimodal transportation improvements, including freeways, high-occupancy vehicle facilities, bus and rail transit, freight movement, and aviation. This plan therefore sets the framework for the regional transportation infrastructure system that services the university. Connect SoCal sets several subgoals applicable to transportation (SCAG 2024):

- Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.
- Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances.
- Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.
- Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.

San Gabriel Valley Council of Governments (SGVCOG) Transit Feasibility Study

The SGVCOG Transit Feasibility Study identified feasible transit solutions including developing and providing equitable and accessible transit services, reducing travel times, managing roadway congestion, and enhancing connections to the regional/local transit networks. The new East-West Bus Rapid Transit (BRT) Service from Atlantic station in East LA to Pomona Transit Center is programmed as a Mid Term Plan by 2035.

Metro Long Range Transportation Plan

The 2020 LA Metro Long Range Transportation Plan (LRTP) is a 30-year strategic framework that outlines transportation investments across Los Angeles County. The LRTP emphasizes better transit, less congestion, complete streets, and increased access to opportunity. This plan details future transit expansion projects and investments with other agencies to maintain local transportation systems. The following projects mentioned in the LRTP directly connect with Pomona and the campus' transportation network (Metro 2020).

- SR-71 Gap Closure from I-10 to Rio Rancho Road: The SR-71 Gap Closure project is a freeway improvement project planning to expand the SR-71 from four to eight lanes between the I-10 and Rio Rancho Road, increasing freeway capacity. This segment lies east of the campus, with connections to Campus Drive and Valley Boulevard.

- Metro A-Line (formerly Gold Line) Foothill Extension to Claremont: LA Metro is expanding the Foothill Gold Line, which will extend the Metro A Line to add stations in Glendora, San Dimas, La Verne, Pomona, Claremont, and Montclair.

4.17.2.4 Local

As a state entity, Cal Poly Pomona is not subject to local government permitting or regulations, policies, or ordinances, such as the general plans and ordinances for the City of Pomona, City of Walnut, or the County of Los Angeles. Because Cal Poly Pomona is not subject to local general plans or other local land use plans and/or ordinances, these regulations are not summarized here or further analyzed in this section. However, some of the proposed circulation and mobility improvements could, if ultimately implemented, occur on roadways under the City of Pomona jurisdiction. Therefore, the following City of Pomona policies and standards would apply to those improvements.

Foothill Transit's Forward Plan

Foothill Transit Forward is a Comprehensive Operational Analysis (COA) to create a service plan that will make Foothill Transit a more convenient and useful transportation option across the San Gabriel Valley. It includes several initiatives aimed at enhancing transit services to Cal Poly Pomona:

- **Bronco Mobility Hub:** Foothill Transit and Cal Poly Pomona are collaborating on the development of the Bronco Mobility Hub. This facility is designed to provide an integrated suite of mobility services, amenities, and technologies to enable seamless multimodal trips. It aims to connect different transportation modes, prioritizing transit/shuttle, walking, biking, and shared mobility.
- **Class Pass Program:** The Class Pass program offers all currently enrolled undergraduate and graduate students at Cal Poly Pomona free rides on Foothill Transit buses throughout the semester. Students can obtain their free Class Pass at the BRIC front desk.
- **Silver Streak Service Enhancement:** Foothill Transit's Silver Streak, a bus rapid transit service, added a weekday-only stop at Cal Poly Pomona in January 2023. The service hours were later extended to 9 p.m. in October 2023, improving connectivity between the campus and key destinations such as Montclair, El Monte, and Downtown Los Angeles.
- **Bus Route Adjustments:** As part of the Foothill Transit Forward initiative, adjustments were made to several bus routes to better serve the Cal Poly Pomona area. For instance, Line 195 (Pomona–Cal Poly) underwent modifications to enhance efficiency and connectivity based on ridership data and community feedback.

These efforts collectively aim to improve transit accessibility and convenience for the Cal Poly Pomona community.

City of Pomona General Plan

The Pomona General Plan (City of Pomona 2014) establishes Pomona's visions and goals to guide the future development of the City. Goals set by the City relevant to this analysis relating to transportation, transit, and active transportation are listed below.

- 7D.G1: Distribute vehicular, transit, bicycle, and pedestrian traffic appropriately throughout the City.
- 7D.G3: Support regional efforts to the extent feasible, to reduce greenhouse gas (GHG) emissions from cars and light trucks.

- 7D.G7: Promote a multi-modal transportation system that serves and is served by the future City structure.
- 7D.G8: Maintain a safe, efficient, and coherent system of both motorized and active, non-motorized circulation.
- 7D.G9: Expand the choices of available transportation modes to effectively increase the freedom of movement for Pomona's residents and reduce reliance on the automobile.
- 7D.G13: Promote transportation access and connectivity between neighborhoods, Downtown, and activity centers.
- 7D.G14: Minimize the negative impacts of motor vehicle traffic on residential neighborhoods where appropriate.
- 7D.G16: Encourage the use of public transportation, especially for commute trips, and increase Citywide transit ridership.
- 7D.G18: Make transit centers and facilities more visible and accessible throughout the community.
- 7D.G20: Foster walkable and accessible street environments that connect Pomona's many unique neighborhoods and districts.
- 7D.G21: Develop a comprehensive bicycle network that connects local and regional commuter and recreation routes.
- 7D.G22: Establish realistic bikeway usage goals in concert with SCAG's Regional Transportation Plan.
- 7D.G23: Ensure bicycle safety through engineering, education and enforcement programs.
- 7D.G24: Require new development or redevelopment to provide bicycle parking where appropriate and ensure it is located in safe, prominent locations.
- 7D.G25: Use transportation demand management (TDM) tools on a Citywide basis to encourage and create incentives for the use of alternate travel modes for various project sizes and land uses.

City of Pomona Active Transportation Plan

The City of Pomona Active Transportation Plan (City of Pomona 2012) provides an assessment of the existing sidewalk and bicycle network, identifying gaps in the bicycle/pedestrian network and proposing recommendations to guide future active transportation developments in Pomona. The Active Transportation Plan sets multiple considerations relating to this analysis as listed below.

- Bicycle network enhancements focus on providing connections to city and regional destinations.
- Future development should include sidewalks, street lighting, and safely designed intersections.
- Potential pedestrian improvements aim to shorten pedestrian crossing distance and to reduce vehicle speeds, especially between neighborhoods and key destinations.

4.17.3 Thresholds of Significance and Methodology

4.17.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines Section 15064.7). The significance criteria used to evaluate the proposed Master Plan's impacts to

transportation are based on CEQA Guidelines Appendix G. For the purposes of this proposed Master Plan, a potentially significant impact to transportation would occur if the proposed Master Plan would:

1. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
2. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
4. Result in inadequate emergency access.

For plan conflicts (Threshold 1), the programs, plans, ordinances, and policies considered in the analysis presented here are those provided in Section 4.17.2, Regulatory Framework. For VMT impacts (Threshold 2), the CSU TISM recommends specific numeric thresholds for proposed Master Plan and cumulative conditions as shown in Section 4.17.3.2.

4.17.3.2 Methodology

Proposed Mobility and Circulation Improvements

The major mobility and circulation improvements proposed include the Kellogg Gateway project, enhancements to the existing Campus Loop, such as repaving and restriping University Drive for shuttle accommodations, and a new campus mobility center.

The Kellogg Gateway project introduces new controlled intersections on Kellogg Drive at East Campus Drive and University Drive, intersection improvements, additional signage, and narrowing Kellogg Drive to make space for pedestrian safety improvements.

The Campus Loop construction is a proposed circulating shuttle that would loop around the campus core. This would involve the striping of a shuttle lane on University Drive between Camphor Lane and Red Gum Lane, along with road widening, additional signage, and shuttle stops on University Drive.

The Bronco Mobility Hub is a planned multimodal transportation center on campus to make transportation connections more seamless, including designated campus pick-up/drop-off locations for rideshare vehicles, bus plaza and bus bays, bike facilities, University Police guard shack, EV charging stations, and other amenities. The proposed location is Parking Lot B (north) off South Campus Drive and Kellogg Drive, to minimize the impact on FT route schedules and to connect with the campus shuttle loop.

Travel Demand Forecasting Model

The SCAG activity-based travel demand forecasting model (ABM) was used to assist with this effort and is consistent with the *2024 SCAG Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS)* (SCAG 2024). The SCAG 2024 RTP/SCS model has an updated base year of 2019 and future year of 2050.

As an ABM, the SCAG 2024 RTP/SCS model simulates individual's travel tour which results in different VMT methodologies as compared to a trip-based model (TBM). The main enhancement for the SCAG 2024 RTP/SCS modeling platform over the TBM is the application of an activity-based travel demand simulation tool which can simulate individual travel choice with high behavioral realism. The model addresses both household-level and

person-level travel choices including intra-household interactions between household members across a wide range of activity and travel dimensions. It predicts travel as emerging from activity participation, using various innovative sub-models, such as a combinatorial mode choice model that predicts tour mode and trip mode simultaneously.

Modeling Assumptions

Land use inputs in SCAG ABM were updated through coordination with Cal Poly Pomona staff to develop projected buildout of the proposed Master Plan. During the Fall 2023 academic term, Cal Poly Pomona's total enrollment was 22,847 Full Time Equivalent (FTE) students and 2,231 FTE faculty and staff members. Implementation of the proposed Master Plan would result in an increase from 22,847 FTES[1] to approximately 30,000 FTES. It is assumed that the current student to faculty and staff ratio (10.2 FTES to 1 FTE faculty and staff) would be maintained for an increase in 710 FTE faculty-and-staff members. International Polytechnic (I-Poly) High School is included in the proposed Master Plan area with 525 students and 50 staff and faculty under the existing conditions. There is no plan for an enrollment or staffing increase for the I-Poly High School under the proposed Master Plan buildout year. The Master Plan also proposes to build a multi-purpose recreational center which would serve students and is not anticipated to result in additional proposed Master Plan population. The land use assumptions are summarized in Table 4.17-7.

Table 4.17-7. Existing and Projected Student, Staff, and Faculty Population

	Existing (Fall 2023)		Master Plan Projected		Net Increase	
	Headcounts	FTES	Headcounts	FTES	Headcounts	FTES
Cal Poly Pomona						
Total Students	26,415	22,847	34,500	30,000	8,085	7,153
Resident Students	3,929	3,398	5,109	4,443	1,180	1,045
Off-Campus Students	22,486	19,449	29,391	25,557	6,905	6,108
Faculty and Staff	2,762	2,231	3,641	2,941	879	710
I-Poly						
Students	525	525	525	525	0	0
Faculty and Staff	50	50	50	50	0	0
Innovation Village						
Employee	550	350	550	350	0	0

[1] The FTES are based on Fall enrollment, which assumes the highest estimate than what occurs throughout the rest of the year.

VMT Analysis Methodology

Per the requirements in the CSU TISM, the following VMT forecasts and metrics were generated:

1. Origin-Destination (OD) VMT per Service Population[2] (all vehicles and all trip purposes): The total VMT to and from all zones in the geographic area are divided by the total service population to get the efficiency metric of VMT per service population.
2. Boundary VMT per Service Population: The total link-level VMT was calculated from multiplying total link length by total traffic volumes. The VMT is then divided by the total service population within the geographic area.

As part of the forecasts, the latest base year and future year models were obtained from SCAG. The model traffic analysis zone structure was reviewed and updated to isolate existing uses at the campus and isolate proposed uses at the campus in different zones for assessment. Based on the review of SCAG future year RTP-consistent land use forecasts, the proposed Master Plan's full increase of 30,000 FTE is not included in SCAG's growth allocation. The following scenario forecasts were developed:

- Notice-of-Preparation (NOP) Year (2024) No Master Plan Forecasts
- NOP Year (2024) With Master Plan Forecasts
- Future Year (2040) No Master Plan Forecasts
- Future Year (2040) With Master Plan Forecasts

Base year and future year forecasts came directly from the model runs. The NOP Year (2024) and Future Year (2040) forecasts were linearly interpolated between SCAG base (2019) and future year (2050) model forecasts. Appendix F presents the SCAG ABM roadway network and forecasted daily traffic volumes.

VMT Analysis Thresholds of Significance

The 2020 CSU TISM recommends specific numeric thresholds of significance for project and cumulative conditions to identify VMT impacts; the project's impact on VMT would be considered significant if:

- Project OD VMT per service population exceeds the threshold of 15% below existing regional, sub-regional, or citywide OD VMT per service population

A project will result in a cumulative impact if its effect on VMT results in any of the following:

- Boundary VMT per service population under the "with project" condition exceeds the regional, sub-regional, or citywide Boundary VMT per service population identified under the RTP/SCS condition

[2] Service population is defined as residential population plus employment plus students. Resident students are double counted in this evaluation to provide a comparable estimate to the City average.

4.17.4 Impact Analysis

4.17.4.1 Project Impacts

Impact 4.17-1 The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. (Less than Significant)

Program-Level Analysis for Master Plan

Construction

Construction activities would occur within the boundaries of the Cal Poly Pomona main campus and would include demolition, renovation, and for new facilities proposed on the campus, site preparation and building and other infrastructure construction. Major components of site preparation would involve demolition of existing buildings and removal of existing site elements, excavation and grading of the site, and construction of necessary infrastructure and facilities. Proposed Master Plan development would be confined to the campus and would not conflict with plans, ordinances, or policies addressing the circulation system and impacts would be **less than significant**.

Transit Facilities

Major mobility and circulation improvements in the proposed plan include the repaving and striping of University Drive for a shuttle lane, a circulating shuttle (Campus Loop), and a new campus transit center (Bronco Mobility Hub [Building 133]), proposed in Parking Lot B (north). The Bronco Mobility Hub would also be a new stop location for nearby Foothill Transit routes on South Campus Drive and Temple Avenue to reduce traffic back-ups and pedestrian crossings near them. These proposed improvements change routes and shuttles operating within the campus and optimize Foothill Transit routes, aiming to enhance the existing transit facilities for users. In addition, two new traffic signals are proposed to control bus access to the future Bronco Mobility Hub. Thus, planned mobility and circulation improvements improve campus connectivity to Foothill Transit and do not conflict with the existing transit facilities and impacts would be **less than significant**.

Pedestrian/Bicycle Facilities

The proposed Master Plan emphasizes enhancing pedestrian and bicyclist safety campus wide. Improvements to wayfinding, including marked crossings, lighting, and signage for pedestrians and bikers are planned alongside proposed major mobility and circulation improvements. Planned improvements to pedestrian malls and multi-modal malls will further support active transportation. These improvements in conjunction with the expansion of campus transit support both the RTP/SCS goal of increasing mobility options and Pomona's General Plan goals of expanding multi-modal transportation. The proposed Master Plan does not include network modifications that would disrupt existing or planned pedestrian and bicycle facilities, and would not conflict with plans, ordinances, or policies addressing these facilities. Impacts would be **less than significant**.

Roadway Facilities

Mobility and circulation improvements are planned to expand multi-modal connectivity on campus. Kellogg Drive Improvements plan for roadway reconfiguration improvements at Kellogg Drive and East Campus Drive, including adding a left turn lane and signal control, upgrading East Campus Drive to a two-way road, and overall improving

intersection safety. Changes to internal road facilities such as restriping are also proposed in support of other modes of transportation and would not interfere with existing roadway facilities.

The proposed Master Plan is also adopting a TDM Plan that is intended to balance use of roadways to improve efficiency for all mobility methods. The TDM strategies include incentives, outreach, parking management, transit initiatives, and more. The proposed Master Plan provides additional policies on reducing VMT as well as improving mobility options consistent with local and statewide requirements. Additionally, there would be no net increase in parking. The proposed Master Plan works to shift FTES away from single-occupancy vehicles. Therefore, the proposed Master Plan would not result in the disruption of existing on planned roadways and impacts would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Construction

To address construction traffic that could affect external roadways, the CSU standard construction Best Management Practices outlined in the CSU OCIP Safety Manual require that construction contractors implement construction traffic control plans (CSU 2016). With adherence to existing standards and requirements regarding the preparation of construction traffic control plans in coordination with the City of Pomona, safe access to the pedestrian, bicycle, transit, and street facilities within and adjacent to the Cal Poly Pomona main campus would be maintained during construction activities associated with development of the near-term projects. Therefore, construction of near-term development projects would not conflict with plans, ordinances, or policies addressing the circulation system and impacts would be **less than significant**.

Transit Facilities

The aforementioned Bronco Mobility Hub and circulating shuttle planned for the near term would not disrupt existing transit routes. The location change of nearby stops on South Campus Drive and Temple Avenue to the Bronco Mobility Hub would enhance the existing service by providing improved stop locations and better connecting them to the existing shuttle services. As such, near-term developments relating to transit would not conflict with plans, ordinances, or policies addressing transit facilities and the impact would be **less than significant** (Cal Poly Po

Pedestrian/Bicycle Facilities

Near-term development relating to pedestrian/bicycle facilities consists of the improvements associated with the aforementioned Kellogg Drive Improvements. The improvements plan to enhance visibility through additional signage and intersection control and also propose wider sidewalks, crosswalks, and pedestrian scale lighting. The improvements therefore enhance pedestrian safety, and would not conflict with plans, ordinances, or policies addressing transit facilities and the impact would be **less than significant**.

Roadway Facilities

The addition of a left turn lane and intersection control proposed with the Kellogg Drive Improvements aim to distribute traffic evenly around the campus. The potential road diet at Kellogg Drive would increase safety for road users and lower VMT. Restriping on internal roads such as for the Campus Loop would not interfere with the existing external roads. The changes would not conflict with plans, ordinances, or policies addressing roadway facilities and the impact would be **less than significant**.

Impact Summary

As discussed above, the proposed Master Plan and near-term projects would not conflict with plans, ordinances, or policies addressing transit facilities, pedestrian and bicycle facilities, and roadway facilities. Impacts would be **less than significant**.

Impact 4.17-2 The project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). (Less than Significant)

Program-Level Analysis for Master Plan

CEQA Guidelines Section 15064.3 describes how transportation impacts are analyzed after SB 743. It eliminates auto delay, the LOS methodology used to assess and quantify such delay, and similar measures of vehicular capacity or traffic congestion as the sole basis for determining significant impacts. Instead, CEQA Guidelines Section 15064.3 requires use of VMT methodology for assessing transportation impacts:

> Generally, VMT is the most appropriate measure of transportation impacts. For the purposes of this section, VMT refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) regarding roadway capacity, a project's effect on automobile delay shall not constitute a significant environmental impact.

A project level VMT assessment with the proposed Master Plan buildout conditions was prepared. Table 4.17-8 summarizes the proposed Master Plan generated VMT. As shown in Table 4.17-8, the OD VMT per service population under the NOP Year (2024) and Future Year (2040) Plus Master Plan Conditions are more than 60% below the City of Pomona, Southeast Subregion, and the San Gabriel Valley Council of Government's (SGVCOG's) average OD VMT per service population.

Table 4.17-8. Project-Level VMT Assessment

Metric	NOP Year (2024) OD	Future Year (2040) OD
Cal Poly Pomona Master Plan VMT	414,226	368,388
Cal Poly Pomona Master Plan Service Population	44,375	44,375
Cal Poly Pomona Master Plan VMT/SP	9.3	8.3
City of Pomona VMT/SP	25.0	24.0
Southeast Subregion VMT/SP	27.6	26.6
SGVCOG VMT/SP	26.6	25.5
Percentage Above City Average	**-63%**	**-65%**
Percentage Above Southeast Subregion Average	**-66%**	**-69%**
Percentage Above SGVCOG Average	**-65%**	**-67%**
VMT Impact	**No**	**No**

Notes: Resident students are double-counted in Service Population to provide a comparable estimate to the City average, which does not have detailed split of on- and off-campus students for all schools/colleges.

It should be noted that the SCAG model, calibrated by regional-wide campus trip data in urban areas of Los Angeles, may be underrepresenting proposed Master Plan VMT. The SCAG model forecasts resulted in approximately half the trips estimated using nationally calibrated trip generation rates *from Institute of Transportation Engineers Trip Generation 11th Edition* based on the number of FTES. Many factors contribute to VMT and trip generation, including on-campus student housing, access to transit, and TDM options. Trip length data was reviewed and found to be generally consistent with campus patterns documented in the TDM Plan. Given that the SCAG Model is considered the best tool available to measure project and regional VMT, and the fact that VMT adjusted to match ITE trip generation metrics would still be below the regional thresholds, this additional context is provided for informational purposes only and the VMT forecasts were not modified.

As shown in Table 4.17-8, the proposed Master Plan would generate VMT per service population at a level below the applicable thresholds. Therefore, the impact would be **less than significant**.

Project-Level Analysis for Near-Term Projects

The near-term projects include replacement, renovation, and new development projects. The replacement and renovation projects would improve the quality and usability of these facilities but would not lead to an increase in the campus population, which is the primary contributor to increased VMT on campus.

Furthermore, the evaluation of the potential for VMT related to implementation of the proposed Master Plan in the program-level analysis above determined that the impact would be less than significant. The program-level analysis of VMT above accounts for all development across Cal Poly Pomona through the horizon year, as the model is based on total population, rather than individual development projects. As such, the near-term projects are accounted for in the modeling and the VMT impact would likewise be expected to be **less than significant**.

Impact 4.17-3 The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). (Less than Significant)

Program-Level Analysis for Master Plan

All roadway, bicycle, and pedestrian facilities would be required to be constructed consistent with the State of California Department of Transportation Standard Specifications, the California Manual on Uniform Traffic Control Devices, as well as City of Pomona Design Standards, and other standards as applicable. The City has adopted these engineering standards to ensure consistency in the geometric design of their roads and driveways. All requested plans for development on City owned roadways undergo a review process at the City by the City Engineer, Planning, Police, and Fire Departments to ensure consistency with the adopted standards. The review process addresses both changes to access during construction, and access after completion of the proposed Master Plan. As the proposed Master Plan does not alter this process, and all future projects would be subject to these reviews, this impact would be **less than significant**.

Project-Level Analysis for Near-Term Projects

Near-term projects would be subject to the same review process and standards as described above. The review process addresses both changes to access during construction, and access after completion of the near-term projects. As near-term projects do not alter this process, and all future projects would be subject to these reviews, this impact would be **less than significant**.

Impact 4.17-4 The project would not result in inadequate emergency access. (Less than Significant)

Program-Level Analysis for Master Plan

According to the California Department of Forestry and Fire Protection (Cal Fire) Fire Hazard Severity Zone (FHSZ) Viewer, the Campus is partially within a very high fire severity area (VHFSA) and in the State Responsibility Area (SRA) (effective April 1st 2024) (Cal Fire 2025). This section of campus is at the northwest corner adjacent and within the hills, open space and agriculture area. Primarily the land uses within this area are parking lots and agriculture land, but some campus buildings are also within the edges of the VHFSA. Further details on campus buildings in VHFSA are detailed in Section 4.10, Hazards and Hazardous Materials.

Obstructions in the roadway, detours, and excessive delays due to congestion are among the factors that can affect emergency response time. Construction activities associated with development under the proposed Master Plan could potentially hinder emergency access within and through the main campus, depending on the locations of work zones and laydown areas. While facilities under the proposed Master Plan have not been designed, nor are specific construction plans and phasing known, the need to maintain access for emergency vehicles is among the considerations when developing traffic control plans. As previously discussed, the CSU standard construction Best Management Practices outlined in the CSU OCIP Safety Manual require that construction contractors implement construction traffic control plans. Additionally, any proposed improvements that would affect roadway design under City of Pomona jurisdiction would be subject to review and approval by the City of Pomona and would be subject to the City's requirements for the preparation of temporary construction traffic control plans. Furthermore, all projects are required to follow the CSU standards set forth in PolicyStat, which requires the CSU Office of Fire Safety to review all projects prior to implementation (CSU 2025b). With adherence to existing standards and requirements, emergency access would be maintained during all construction activities associated with development under the proposed Master Plan. Therefore, the impact would be less than significant during construction.

The Cal Poly Pomona EOP indicates evacuation routes are designated throughout the campus to get students and staff to local assembly areas. For campus evacuation, West Temple Avenue, Kellogg Drive, and South Campus Drive provide direct routes off campus to major highways and freeways. Evacuation coordinators are assigned throughout campus, and evacuation drills are conducted for each building on a regular basis. Assigned local assembly areas guide evacuating individuals away from emergency access points and high-traffic areas, reducing the congestion that could potentially hinder emergency responders. The proposed Master Plan does not change access or create impediments to emergency access that results in longer emergency response times. Emergency and service vehicles would continue to have unlimited access to the campus even if some roads are otherwise restricted to pedestrians, bicyclists, transit vehicles, and service vehicles. Therefore, development under the proposed Master Plan would be designed to meet applicable emergency access and design standards, and adequate emergency access would be provided during operation. With adherence to existing standards, the impact related to emergency access would be **less than significant**.

Further details on emergency evacuation are addressed in Section 4.10, Hazards and Hazardous Materials.

Project-Level Analysis for Near-Term Projects

Obstructions in the roadway, detours, and excessive delays due to congestion are among the factors that can affect emergency response time. Construction activities associated with near-term projects could potentially hinder emergency access within and through the main campus, depending on the locations of work zones and laydown

areas. While near-term projects have not been designed, nor are specific construction plans and phasing known, the need to maintain access for emergency vehicles is among the considerations when developing traffic control plans. As previously discussed, the CSU standard construction Best Management Practices outlined in the CSU OCIP Safety Manual require that construction contractors implement construction traffic control plans. Additionally, any proposed improvements that would affect roadway design under City of Pomona jurisdiction would be subject to review and approval by the City of Pomona and would be subject to the City's requirements for the preparation of temporary construction traffic control plans. Furthermore, all projects are required to follow the CSU standards set forth in PolicyStat, which requires the CSU Office of Fire Safety to review all projects prior to implementation (CSU 2025b). With adherence to existing standards and requirements, emergency access would be maintained during all construction activities associated with near-term impacts. Therefore, the impact would be less than significant during construction.

Near-term projects would not change access or create impediments to emergency access that result in longer emergency response times. Emergency and service vehicles would continue to have unlimited access to the campus even if some roads are otherwise restricted to pedestrians, bicyclists, transit vehicles, and service vehicles. Therefore, near-term projects would be designed to meet applicable emergency access and design standards, and adequate emergency access would be provided during operation. With adherence to existing standards, the impact related to emergency access would be **less than significant**.

4.17.4.2 Cumulative Impacts

Impact 4.17-5 The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to transportation. (Less than Significant)

A cumulative level VMT assessment was prepared in Table 4.17-9 to summarize the proposed Master Plan's effect on VMT within the regional (SGVCOG), subregional (Southeast Subregion) and city boundaries under cumulative conditions. As presented in Table 4.17-9, the regional, subregional and citywide VMT per service population under the Future Year (2040) Plus Master Plan Conditions does not exceed the VMT per service population under the Future Year (2040) No Master Plan Conditions. Therefore, the proposed Master Plan is not expected to result in significant VMT effect under cumulative conditions and the impact would be **less than significant**.

Table 4.17-9. Cumulative-Level VMT Assessment

Metric	Future without Master Plan (2040)	Future with Master Plan (2040)
City of Pomona VMT (Daily total)	3,603,542	3,614,771
City of Pomona Service Population	278,506	288,650
City of Pomona VMT per Service Population (VMT/SP)	**12.9**	**12.5**
Southeast Subregion VMT (Daily total)	12,974,921	13,030,173
Southeast Subregion Service Population	846,357	856,501
Southeast Subregion VMT per Service Population (VMT/SP)	**15.3**	**15.2**
SGVCOG VMT (Daily total)	33,371,633	33,419,829

Table 4.17-9. Cumulative-Level VMT Assessment

Metric	Future without Master Plan (2040)	Future with Master Plan (2040)
SGVCOG Service Population	2,776,737	2,786,881
SGVCOG VMT per Service Population (VMT/SP)	**12.02**	**11.99**

4.17.5 Mitigation Measures

Mitigation measures are not required because a significant impact has not been identified.

4.17.6 Level of Significance After Mitigation

All impacts would be less than significant without mitigation.

4.17.7 References

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4.18 Tribal Cultural Resources

The following analysis identifies potential impacts to tribal cultural resources as a result of implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing tribal cultural resources conditions of the proposed Master Plan area, discusses the regulatory setting, evaluates potential impacts to tribal cultural resources, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts. This section is based on an Archaeological Resources Inventory Report prepared in April 2025 in support of the proposed Master Plan (Appendix D-1) and from information gathered from Assembly Bill (AB) 52 consultation meetings. See Section 4.5, Cultural Resources - Archaeological Resources, for separate discussion of archaeological resources.

A comment related to tribal cultural resources was received during the public scoping period in response to the Notice of Preparation (NOP) from the Native American Heritage Commission (NAHC). The letter from NAHC provided a range of recommendations related to consultation under AB 52 and to the analysis of tribal cultural resources in this EIR. The NOP and comments received in response are provided in Appendix A.

4.18.1 Environmental Setting

4.18.1.1 Existing Conditions

The existing Cal Poly Pomona main campus is located in the cities of Pomona and Walnut, and within unincorporated areas of Los Angeles County, California. The proposed Master Plan area falls within Sections 27 and 28 of Township 1 South and Range 9 West of the *San Dimas, California* USGS 7.5-minute Quadrangle map.

The area of potential impacts (API) for archaeological resources (archaeological API) includes the area of direct physical effect for the proposed Master Plan, with an added 25-foot buffer, consisting of a total area of 373-acres as delineated in Figure 4.5-1, API for Archaeological Resources (see Section 4.5, Cultural Resources – Archaeological Resources). The archaeological API is assumed to cover the portions of the campus wherein the development under the proposed Master Plan would be located.

4.18.1.2 Prehistoric Setting

Evidence for continuous human occupation in Southern California spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad period have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. To be more inclusive, this research employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1769), and Ethnohistoric (post-AD 1769).

For an expanded discussion of the Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1769), and Ethnohistoric (post-AD 1769) Periods in this region, please refer to Section 4.5A.1.2.

4.18.1.3 Ethnographic Setting

For discussion of the Ethnographic Setting, please refer to Section 4.5, Cultural Resources – Archaeological Resources.

4.18.2 Regulatory Setting

4.18.2.1 Federal

There are no federal tribal cultural resource laws, regulations, plans, ordinances, or policies applicable to the proposed Master Plan.

4.18.2.2 State

California Register of Historic Resources

In California, the term "historical resource" includes, but is not limited to, "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC Section 5020.1[j]). In 1992, the California legislature established the California Register of Historical Resources (CRHR) "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP), enumerated as follows: According to California Public Resources Code (PRC) Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity" and (ii) meets at least one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Environmental Quality Act

The following CEQA statutes (PRC Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.) are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- PRC Section 21083.2(g) defines "unique archaeological resource."
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines "historical resources." In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change in the significance of an historical resource"; it also defines the circumstances when a project would materially impair the significance of a historical resource.
- PRC Section 21074(a) defines "Tribal Cultural Resources."
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated cemetery.
- PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (PRC Section 21084.1; 14-CCR 15064.5[b]).

A "substantial adverse change in the significance of an historical resource," reflecting a significant effect under CEQA, means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (14- CCR 15064.5[b][1]; PRC Section 5020.1[q]). In turn, the significance of a historical resource is materially impaired when a project does any of the following (14 CCR 15064.5[b][2]):

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register [CRHR]; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any historical resources, then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance would be materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2[a]–[c]).

PRC Section 21083.2(g) defines a *unique archaeological resource* as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria (PRC Section 21083.2[g]):

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts on non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2[a]; 14 CCR 15064.5[c][4]). However, if a non-unique archaeological resource qualifies as a tribal cultural resource (PRC Sections 21074[c] and 21083.2[h]), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed in PRC Section 5097.98.

Native American Historic Cultural Sites (California Public Resources Code section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the Native American Heritage Commission (NAHC) to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to one year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Repatriation Act), enacted in 2001, required all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California Repatriation Act also provides a process for the identification and repatriation of these items to the appropriate tribes.

California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98.

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further

disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains (California Health and Safety Code Section 7050.5[b]). If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (California Health and Safety Code Section 7050.5[c]). In accordance with California Public Resources Code Section 5097.98(a), the NAHC will notify the Most Likely Descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. Within 48 hours of being granted access to the site, the MLD may recommend means of treatment or disposition, with appropriate dignity, of the human remains and associated grave goods.

AB 52

AB 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that tribal cultural resources must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Section 21074 describes a tribal cultural resource as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American tribe and that is either:

- On or determined to be eligible for the California Register of Historical Resources or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project site, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Section 1(a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

Guidelines for Determining Significance

According to CEQA (§15064.5b), a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. CEQA defines a substantial adverse change:

> Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

The significance of an historical resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR; or
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

Section 15064.5(c) of CEQA applies to effects on archaeological sites and contains the following additional provisions regarding archaeological sites:

- When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- If a lead agency determines that the archaeological site is a historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- If an archaeological site does not meet the criteria defined in subsection (a) but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.
- If an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or Environmental Impact Report (EIR), if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

Section 15064.5(d) and (e) contain additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) provides:

> When an initial study identifies the existence of, or the probable likelihood of, Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code SS5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission. Action implementing such an agreement is exempt from:
>
> 1. The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5); and

2. The requirement of CEQA and the Coastal Act.

Under CEQA, an EIR is required to evaluate any impacts on unique archaeological resources (California Public Resources Code Section 21083.2). A "unique archaeological resource" is defined in California Public Resources Code Section 21083.2(g) as:

> [A]n archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
>
> 1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
> 2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
> 3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

(California Public Resources Code section 21083.2(g)). An impact to a non-unique archaeological resource is not considered a significant environmental impact and such non-unique resources need not be further addressed in the EIR (Public Resources Code section 21083.2(a); CEQA Guidelines section 15064.5(c)(4)).

As stated above, CEQA contains rules for mitigation of "unique archaeological resources." For example, "[i]f it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:

1. Planning construction to avoid archaeological sites.
2. Deeding archaeological sites into permanent conservation easements.
3. Capping or covering archaeological sites with a layer of soil before building on the sites.
4. Planning parks, greenspace, or other open space to incorporate archaeological sites." (Pub. Resources Code section 21083.2(b)(1)-(4).)

Public Resources Code section 21083.2(d) states that "[e]xcavation as mitigation shall be restricted to those parts of the unique archaeological resource that would be damaged or destroyed by the project. Excavation as mitigation shall not be required for a unique archaeological resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, if this determination is documented in the environmental impact report."

The rules for mitigating impacts to archaeological resources to qualify as "historic resources" are slightly different. According to CEQA Guidelines section 15126.4(b), "[p]ublic agencies should, whenever feasible, seek to avoid damaging effects on any historic resource of an archaeological nature. The following factors shall be considered and discussed in an EIR for a project involving such an archaeological site:

A. Preservation in place is the preferred manner of mitigating impacts to archaeological sites. Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.

B. Preservation in place may be accomplished by, but is not limited to, the following:
    1. Planning construction to avoid archaeological sites;
    2. Incorporation of sites within parks, greenspace, or other open space;
    3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site[; and]
    4. Deeding the site into a permanent conservation easement.

Thus, although Section 21083.2 of the Public Resources Code, in addressing "unique archaeological sites," provides for specific mitigation options "in no order of preference," CEQA Guidelines section 15126.4(b), in addressing "historical resources of an archaeological nature," provides that "[p]reservation in place is the preferred manner of mitigating impacts to archaeological sites."

Under CEQA, "[w]hen data recovery through excavation is the only feasible mitigation," the lead agency may cause to be prepared and adopt a "data recovery plan," prior to any excavation being undertaken. The data recovery plan must make "provision for adequately recovering the scientifically consequential information from and about the historic resource." (CEQA Guidelines section 15126.4(b)(3)(C).) The data recovery plan also "must be deposited with the California Historical Resources Regional Information Center." (*Ibid*.) Further, "[i]f an artifact must be removed during project excavation or testing, curation may be an appropriate mitigation." (*Ibid*.)

However, "[d]ata recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historic resource, provided that determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center." (CEQA Guidelines section 15126.4(b)(3)(D)).

4.18.3 Thresholds of Significance and Methodology

4.18.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines §15064.7). The significance criteria used to evaluate the proposed Master Plan's impacts to tribal cultural resources are based on CEQA Guidelines Appendix G. For the purposes of this project, a potentially significant impact to tribal cultural resources would occur if the proposed Master Plan would:

1. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
    a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.18.3.2 Methodology

Records Search

A California Historical Research Information System (CHRIS) records search for the proposed Master Plan area and a one-mile radius was completed on May 8, 2024, at the South Central Coastal Information Center (SCCIC). The SCCIC records search included a review of all previously recorded investigations and cultural resources within a one-mile radius of the proposed Master Plan area. Overall, the records search indicates that eight (8) cultural resources have been previously recorded within a one-mile radius of the proposed Master Plan area. Of these, one historic (built environment) resource, P-19-186990, is located on the main campus (see Section 4.6, Historic Resources, for information about this resource). The remaining seven (7) cultural resources within the search radius include one (1) prehistoric site, one (1) historic-era site, and five (5) historic-era built environment resources (Table 4.18-1), none of which are on Cal Poly's main campus.

Table 4.18-1. Previously Recorded Cultural Resources within One Mile of Proposed Master Plan Area

Primary Number	Trinomial	Age	Description	Eligibility Status
Within Proposed Master Plan Area				
P-19-186990	—	Historic-era	Cal Poly Pomona's Laboratory Building 3	Recommended ineligible for NRHP and CRHR
Outside Proposed Master Plan Area				
P-19-000883	CA-LAN-000883	Prehistoric	Possible lithic-tool quarry site	Unknown
P-19-001867	CA-LAN-001867H	Historic-era	Phillips Ranch Mansion Site	Unknown
P-19-180724	—	Historic-era	Louis Phillips Mansion	Listed on NRHP under Criterion C
P-19-186112	—	Historic-era	Southern Pacific Railroad	Recommended eligible for NRHP under Criteria A and B
P-19-186869	—	Historic-era	Mount San Antonio College Campus	Recommended eligible for NRHP under Criteria A and C
P-19-189475	—	Historic-era	Water tank	Recommended ineligible for NRHP; Not evaluated for CRHR
P-19-192745	—	Historic-era	Remnants of a cattle chute, cattle corral, water trough, cattle gate, and dirt access road	Recommended ineligible for NRHP and CRHR

Native American Heritage Commission Sacred Lands File Search

NAHC search of the Sacred Lands File (SLF) was requested for the proposed Master Plan area. The NAHC replied via email on February 22, 2024, stating that the SLF search was completed and indicated a positive result for the presence of Native American cultural resources within one mile of the main campus. Additionally, the NAHC provided a list of Native American tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in the area. Informal tribal outreach letters were mailed on April 4, 2025,[1] to all Native American group representatives included on the NAHC contact list. These letters attempted to solicit information relating to Native American resources that may be impacted by proposed Master Plan implementation.

Cal Poly Pomona Archives

In 1975, The Poly Post, Cal Poly Pomona's student-run newspaper, published an article about cultural resources recovered during the construction of Cal Poly Pomona's Science Building 8 (College of Science) in the 1970s. It was reported that two metates were recovered from a depth of approximately 7 to 8 feet below surface grade, along an alluvial plain. The article also states that additional cultural resources were observed during the construction of Cal Poly Pomona's Engineering Building 9 and La Cienega Center Building 59, but the article does not describe the artifacts that were observed or the context when encountered (The Poly Post 1975). A California Department of Parks and Recreation (DPR) site form was prepared for this discovery and will be submitted to the SCCIC of the CHRIS at California State University, Fullerton.

In 1986, the Cal Poly Pomona sponsored radio station KWOW-AM, conducted an interview with Doctor Joan Greenway, professor of Anthropology and the Social Sciences Department at Cal Poly Pomona (Pierce 1986). During the interview, Dr. Greenway stated that Native American objects have been occasionally found during the construction of building foundations on campus throughout the years. Specifically, Dr. Greenway mentioned that "manos, metates, flints, arrowheads" and other artifacts were found during the construction of the science building (Building 8) (Pierce 1986).

Pedestrian Survey

A reconnaissance-level pedestrian survey of the archaeological API was conducted on May 31, 2024. Standard archaeological procedures and techniques consistent with the Secretary of the Interior's Professional Qualification Standards for Archaeology were employed during the survey. When possible, 10-meter (approximately 33-feet) interval systematic transects were conducted and oriented in cardinal direction. Where visible, the ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock, imported marine shell), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as rodent/reptile burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials, as were areas of exposed ground surface such as in landscaping beds and gardens.

The archaeological API is the Cal Poly Pomona main campus consisting of residential, administrative, and educational buildings, agricultural and equestrian facilities, fenced agricultural fields, a sports complex, vehicular roadways, paved parking lots, parking structures, courtyards, landscaping, and pedestrian pathways. A reconnaissance-level pedestrian survey was conducted across the majority of the archaeological API (90%) due to

[1] A typo was made in these letters regarding the year that the letters were mailed (2024); however, the letters were actually mailed on April 4, 2025.

the built environment nature of the campus core and its associated facilities. Systematic transects were employed in areas where ground surface visibility allowed for the inspection of native soils as indicated in Section 4.5, Cultural Resources – Archaeological Resources, Figure 4.5-1. This accounted for approximately 10% of the total archaeological API.

Ground surface visibility across the archaeological API ranged from non-existent to good (0-80%). Non-existent ground surface visibility (0%) was observed in areas covered by structures, hardscape, and landscaping. This accounted for approximately 85% of the total archaeological API and encompassed the majority of the campus core. Good ground surface visibility (50-80%) was observed within the fallow agricultural fields, undeveloped open spaces, and in some landscaping features the campus core. This accounted for approximately 15% of the total archaeological API. Overall, no prehistoric or historic-era archaeological resources were identified within the archaeological API during the pedestrian survey.

AB 52 Consultation

The proposed Master Plan is subject to compliance with AB 52 (California Public Resources Code section 21074), which requires consideration of impacts to tribal cultural resources as part of the CEQA process and that the lead agency notify California Native American tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the proposed Master Plan. As the project proponent and representative of the CEQA lead agency, Cal Poly Pomona sent notification letters pursuant to AB 52 via U.S. Postal Service certified mail and email on April 2, 2024, to 11 tribal representatives listed on the proposed Master Plan's NAHC contact list. The notification letters contained a project description, a project location map, outline of AB 52 timing, an invitation to consult, and contact information for the appropriate lead agency representative. Table 4.18-2 summarizes the results of the AB 52 consultation efforts.

Table 4.18-2. Assembly Bill 52 Native American Tribal Outreach Results

Native American Tribal Representatives	Consultation Record
Andrew Salas, Gabrieleno Band of Mission Indians – Kizh Nation	No response received.
Anthony Morales, Gabrieleno/Tongva San Gabriel Band of Mission Indians	No response received.
Charles Alvarez, Gabrielino-Tongva Tribe	No response received.
Christina Conley, Gabrielino Tongva Indians of California Tribal Council	No response received.
Christina Swindall Martinez, Gabrieleno Band of Mission Indians – Kizh Nation	No response received.
Jessica Valdez, Soboba Band of Luiseño Indians	No response received.
Joseph Ontiveros, Soboba Band of Luiseño Indians	No response received.
Lovina Redner, Santa Rosa Band of Cahuilla Indians	No response received.
Robert Dorame, Gabrielino Tongva Indians of California Tribal Council	No response received.
Sam Dunlap, Gabrielino-Tongva Tribe	No response received.

Table 4.18-2. Assembly Bill 52 Native American Tribal Outreach Results

Native American Tribal Representatives	Consultation Record
Sandonne Goad, Gabrielino/Tongva Nation	**April 5, 2024** Email from Ms. Goad to Cal Poly Pomona indicating that Gabrielino/Tongva Nation Tribal Council Member John Blunt is the current Tribal contact for cultural resources department inquiries. **April 9, 2024** Email from Mr. Blunt to Cal Poly Pomona requesting consultation and indicating the proposed Master Plan area is culturally sensitive. **April 10, 2024** Email from Cal Poly Pomona to Mr. Blunt acknowledging receipt of Mr. Blunt's request for consultation. Cal Poly Pomona additionally offered AB 52 consultation by virtual meeting or in-person and at the discretion of Mr. Blunt. **May 10, 2024** Virtual consultation meeting conducted between Cal Poly Pomona and the Gabrielino/Tongva Nation. During the meeting, the Gabrielino/Tongva Nation indicated that the proposed Master Plan area is considered culturally sensitive and requested Native American monitoring during ground disturbing activities for the proposed Master Plan. **April 14, 2025** Email from Cal Poly Pomona to Ms. Goad and Mr. Blunt providing the archaeological resources reporting and Cal Poly Pomona's proposed tribal cultural resources mitigation measures prepared for the proposed Master Plan. **April 22, 2025** Email from Mr. Blunt to Cal Poly Pomona indicating that the Gabrielino/Tongva Nation approve of the proposed tribal cultural resources mitigation measures prepared for the proposed Master Plan. In his email, Mr. Blunt provided no additional comments or recommendations. **April 30, 2025** Email from Cal Poly Pomona to Mr. Blunt concluding consultation with the Gabrielino/Tongva Nation pursuant to AB 52.

4.18.4 Impact Analysis

4.18.4.1 Project Impacts

Impact 4.18-1 **The project could cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a**

California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or as determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. (Potentially Significant)

Program-Level Analysis for the Master Plan

As discussed above, the SCCIC records search results did not identify any previously recorded cultural resources of Native American origin within the proposed Master Plan area, although one (1) was identified within the one-mile search radius (P-19-000883). Although the SCCIC records search did not identify any cultural resources of Native American origin within the proposed Master Plan area, there is evidence to indicate that prehistoric artifacts have been identified in the past during construction activities on the Cal Poly Pomona campus (see Section 4.18.3.2, Methodology). A NAHC SLF search was also requested, and results were positive for Native American cultural resources within one mile of the proposed Master Plan area. Additionally, a reconnaissance-level pedestrian survey was conducted across the archaeological API. Though the reconnaissance-level pedestrian survey did not identify any cultural resources of Native American origin within the proposed Master Plan area, the large majority (85%) of the ground surface was obscured by structures, hardscape, and landscaping.

In response to Cal Poly Pomona's offer of consultation under AB 52, the Gabrielino/Tongva Nation reached out via email with a request for consultation. A virtual meeting was conducted on May 10, 2024, between Cal Poly Pomona and the Gabrielino/Tongva Nation. During the meeting, the Gabrielino/Tongva Nation indicated that the proposed Master Plan area is considered culturally sensitive and requested Native American monitoring during ground disturbing activities for the proposed Master Plan. On April 14, 2025, Cal Poly Pomona provided via email to the Gabrielino/Tongva Nation the archaeological resources reporting and proposed tribal cultural resources mitigation measures prepared for the proposed Master Plan. On April 22, 2025, the Gabrielino/Tongva Nation replied via email to Cal Poly Pomona indicating that they approve of the proposed tribal cultural resources mitigation measures prepared for the proposed Master Plan. In the email, the Gabrielino/Tongva Nation did not make any further comments or recommendations. Cal Poly Pomona concluded consultation with the Gabrielino/Tongva Nation on April 30, 2025.

Although there is evidence to indicate artifacts of Native American origin have been identified in the past during construction activities on the Cal Poly Pomona campus, no previously recorded cultural resources of Native American origin listed on the CRHR or local register were identified within the proposed Master Plan area as a result of the SCCIC records search or pedestrian survey. Additionally, no known tribal cultural resources have been identified through consultation between Cal Poly Pomona and the Gabrielino/Tongva Nation that would be impacted by the proposed Master Plan. However, given that there is evidence to indicate that prehistoric artifacts have been identified in the past during construction activities and that the Gabrielino/Tongva Nation indicated that the proposed Master Plan area is considered culturally sensitive, the impact of the proposed Master Plan on unknown tribal cultural resources would be **potentially significant**. Moreover, subsequent discretionary projects may be required to prepare site-specific project-level analysis to fulfill CEQA requirements, which may include additional AB 52 consultation that could lead to the identification of tribal cultural resources.

In acknowledgment of information provided through consultation and in an effort to protect unknown tribal cultural resources, Cal Poly Pomona has developed mitigation measures to address potential impacts related to the inadvertent discovery of tribal cultural resources during construction. These mitigation measures were reviewed

and agreed to by the Gabrielino/Tongva Nation during consultation. With implementation of MM-TCR-1 through MM-TCR-3, which provide for Native American monitoring during initial ground-disturbing activities and inadvertent discovery protocols, potentially significant impacts to unknown tribal cultural resources would be reduced to **less than significant**. (See Section 4.18.5, Mitigation Measures, for the full text of these mitigation measures.)

Project-Level Analysis for Near-Term Projects

No known tribal cultural resources have been identified through consultation between Cal Poly Pomona and the Gabrielino/Tongva Nation that would be impacted by the near-term projects identified within the proposed Master Plan. However, given that there is evidence to indicate that prehistoric artifacts have been identified in the past during construction activities and that the Gabrielino/Tongva Nation indicated that the proposed Master Plan area is considered culturally sensitive, the impact of the near-term projects on unknown tribal cultural resources would be **potentially significant**.

In acknowledgment of information provided through consultation and in an effort to protect unknown tribal cultural resources, Cal Poly Pomona has developed mitigation measures to address potential impacts related to the inadvertent discovery of tribal cultural resources during construction. These mitigation measures were reviewed and agreed to by the Gabrielino/Tongva Nation during consultation. With implementation of MM-TCR-1 through MM-TCR-3, potentially significant impacts to unknown tribal cultural resources would be reduced to **less than significant**.

4.18.4.2 Cumulative Impacts

Impact 4.18-2 The project could result in a cumulatively considerable contribution to significant cumulative impacts related to tribal cultural resources. (Less than Significant)

CEQA requires cumulative effects be considered for projects that are proposed or pending, recently approved, under construction, or reasonably foreseeable as well as the proposed Master Plan for this EIR. Cumulative effects on tribal cultural resources evaluate whether impacts of the proposed Master Plan and related cumulative projects, when considered together, substantially diminish the number of tribal cultural resources within the same or similar context or property type. As discussed in Chapter 4.0 Environmental Analysis (Table 4.0-1), there are numerous pending or approved related off-campus cumulative projects that have the potential to contribute to cumulative impacts to tribal cultural resources.

As discussed above, there are no known significant tribal cultural resources as defined in Public Resources Code section 21074, Public Resources Code section 5020.1(k), and as determined by the lead agency present within the proposed Master Plan area. Because all tribal cultural resources are unique and nonrenewable resources, projects that demolish or alter certain tribal cultural resources have the potential to erode a general cultural landscape to which the tribal cultural resources belong. Therefore, implementation of the proposed Master Plan could result in a cumulatively significant effect on tribal cultural resources when combined with other cumulative development in the area due to the loss of identified or unknown tribal cultural resources through the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance of a resource would be materially impaired. However, development under the proposed Master Plan is required to implement MM-TCR-1, MM-TCR-2, and MM-TCR-3, which would reduce project-related impacts to less than significant within proposed Master Plan area. Because there are no known tribal cultural resources within the proposed Master Plan area, the mitigation is for inadvertent discoveries. The project-specific mitigation combined with the mandatory evaluation of potential impacts to other nearby cumulative projects would ensure that there

would be no cumulatively considerable impacts to significant tribal cultural resources. Therefore, cumulative impacts would be **less than significant**.

4.18.5 Mitigation Measures

MM-TCR-1 Native American Monitoring. Cal Poly Pomona shall invite a Native American monitor from the proposed Master Plan's interested consulting tribe(s) (Tribes) to be present during all initial ground-disturbing activities for the project. Ground-disturbing activities shall include, but are not limited to, demolition, pavement removal, potholing, augering, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. The Native American monitor shall have the approval of the Tribes to monitor for tribal cultural resources. Prior to the initiation of ground-disturbing activities, the Native American monitor shall be invited to participate in a cultural resources sensitivity training as part of a worker environmental awareness program. Topics addressed by the Native American monitor shall include, but may not be limited to, the definitions and characteristics of tribal cultural resources and protocols to be taken in the event of an inadvertent discovery. On-site Native American monitoring shall conclude when project grading and excavation activities are completed, or when the Tribes and Native American monitor have indicated that the site has a low potential for tribal cultural resources.

Daily monitoring logs shall be completed by the on-site Native American monitor. Monitoring logs shall provide descriptions of the relevant ground-disturbing activities; the type of construction activities performed; locations of ground-disturbing activities; soil types; culturally related materials; and any other facts, conditions, and discovered tribal cultural resources including but not limited to Native American cultural and historical artifacts, remains, places of significance, etc. as well as any discovered Native American (ancestral) human remains and associated grave goods. Copies of monitor logs shall be provided to Cal Poly Pomona within 30 days of the conclusion of monitoring.

MM-TCR-2 Inadvertent Discovery Protocols for Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial). In the event that unanticipated tribal cultural resources are exposed during ground-disturbing activities, all construction work occurring within 100 feet of the find shall immediately stop until the discovery has been fully assessed by a Native American monitor from the proposed Master Plan's interested consulting tribe(s) (Tribes). The work exclusion buffer may be adjusted as appropriate to allow work to feasibly continue at the recommendation of the Native American monitor. Should it be required, temporary flagging shall be installed around the tribal cultural resource in order to avoid any disturbances from construction equipment. The potential for avoidance should be the primary consideration of this initial process. The significance of the find shall be assessed as outlined by the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; California Public Resources Code section 21082). If the Tribes and Native American monitor observe the discovery to be potentially significant under CEQA, additional efforts, such as the preparation of an archaeological treatment plan, testing, and/or data recovery, are warranted prior to allowing construction to proceed in this area.

MM-TCR-3 Inadvertent Discovery Protocols for Human Remains and Associated Grave Goods**.** In accordance with section 7050.5 of the California Health and Safety Code and the requirements of the California Code of Regulations (CCR) section 15064.5(e), if human remains are found, the Los Angeles County Coroner (County Coroner) shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent

remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, The County Coroner shall notify the NAHC within 24 hours. In accordance with California Public Resources Code section 5097.98, the NAHC must immediately notify the person or persons it believes to be the Most Likely Descendent (MLD) of the deceased Native American. The MLD shall complete inspection after being granted access to the site and make recommendations for the treatment and disposition, in consultation with Cal Poly Pomona, of the human remains and associated grave goods.

4.18.6 Level of Significance After Mitigation

Implementation of MM-TCR-1 through MM-TCR-3 would reduce the potentially significant impact of the proposed Master Plan, including near-term projects, related to tribal cultural resources (Impact 4.18-1) to **less than significant**.

4.18.7 References

Pierce, Ed. (1986, March 17). *Cal Poly Views: Indian Culture Review at Cal Poly* [Radio broadcast]. KWOW-AM. https://californiarevealed.org/do/b6a066ac-d2c4-41cb-80c8-85f99ffaddef

The Poly Post. 1975. “Workman unearth bowls at Science Building site”. January 21, 1975. Volume 23. Provided to Dudek by California Polytechnic University Pomona’s Tribal Relations and NAGPRA/CalNAGPRA Director, Desireé Reneé Martinez.

4.19 Utilities and Service Systems

The following analysis identifies potential impacts to utilities and service systems resulting from implementation of the California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("proposed Master Plan"). This section describes the existing utilities and service systems of the proposed Master Plan area, discusses the regulatory setting, evaluates potential impacts to utilities and service systems, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts. A Water Supply Evaluation (WSE) for the proposed Master Plan is referenced herein and provided in Appendix G.

Two comments related to utilities and service systems were received during the public scoping period in response to the Notice of Preparation (NOP). One comment, related to construction- and operation-related stormwater management, was received from the Metropolitan Water District of Southern California (Metropolitan). One comment related to wastewater was received by the Los Angeles County Sanitation District (LACSD). The NOP and comments received in response are provided in Appendix A.

4.19.1 Environmental Setting

4.19.1.1 Water

Water Supply

Drinking water for Cal Poly Pomona is primarily served by one groundwater well (Cal Poly Pomona 2024a) that draws from the San Gabriel Groundwater Basin - Spadra Subbasin (Department of Water Resources [DWR] Basin No. 4-013) and two other on-campus wells are used for irrigation. Cal Poly Pomona has its own water treatment plant that treats the groundwater on-site. Groundwater is an important water source for the region, and it is assumed groundwater would make up most of the water supplies for the proposed Master Plan, although Cal Poly Pomona also relies on imported water to meet demand.

The Master Plan area overlies the San Gabriel Groundwater Basin - Spadra Subbasin (Basin). The Basin is a small, unconfined, alluvial aquifer system that covers approximately 4,200 acres (City of Pomona 2021). The Basin is surrounded by four adjudicated groundwater basins consisting of the Chino Basin to the east, the Main San Gabriel Basin to the northwest, the Puente Basin to the west, and the Six Basins to the north. Groundwater from the Basin is primarily pumped by Cal Poly Pomona, Walnut Valley Water District (WVWD), and the City of Pomona (City of Pomona 2021). The estimated total storage capacity of the Basin is 26,000 acre-feet (AF). Recharge to the Basin is from natural precipitation and is considered poor due to urbanization and the concrete lining of San Jose Creek, which is the main draining of the Basin.

Imported water is purchased by Cal Poly Pomona through the designated wholesale water agency, Three Valleys Municipal Water District (TVMWD), to blend with groundwater supplied by Cal Poly Pomona's well to meet water quality requirements (Cal Poly Pomona 2024b). TVMWD receives its water from the Metropolitan Water District of Sothern California (MWD). MWD imports and treats surface water transported through two major conveyance systems: the 242-mile-long Colorado River Aqueduct and the 444-mile-long State Water Project. MWD treats this imported water at its Weymouth Filtration Plant in the City of La Verne.

Recycled Water Use

Cal Poly Pomona has been using recycled water provided by the City for crop irrigation and landscaping since 1965 (CPP 2025). An estimated 97% of the campus is irrigated with recycled water (CPP 2025). Cal Poly Pomona provides the neighboring Forest Lawn Memorial Park with a share of its reclaimed water deliveries from the City in accordance with the terms of an executed 1982 agreement and 2012 amendment and Memorandum of Understanding (MOU) between the Board of Trustees of the California State University on behalf of California State Polytechnic University, Pomona, and the Forest Lawn Company (currently known as Forest Lawn Memorial-Park [Forest Lawn]).

The executed 1982 agreement stipulates the location, function, capacity, respective entities' ownership, maintenance, and cost-sharing responsibilities for the related infrastructure and prohibits Cal Poly's removal or restriction of the operation of its reclaimed water system or the delivery of reclaimed water to Forest Lawn-Covina Hills without that entity's written consent.

The 2012 amendment details a proposed "high lift" pump, metering and control technology at the existing reclaimed water reservoir, scheduled water use by each entity, and other terms and conditions.

The executed 2012 MOU, executed between the Board of Trustees of the California State University on behalf of California State Polytechnic University, Pomona, and Forest Lawn sets forth the services Cal Poly Pomona Facilities Planning & Management was to provide for the planning, coordination, plan check, permit, and inspection of a reclaimed water line extension.

Chilled Water and Steam

Cal Poly Pomona has a Chilled Water Plant in the northwest corner of campus that cools many buildings using a central system. This plant has four large chillers and a thermal energy storage tank. During hot summer months, the plant uses its full capacity to keep the campus cool. The plant also has various pumps and cooling towers to help with this process.

For heating, Cal Poly Pomona uses standalone boiler plants in most buildings with the exception of the three small boiler plants that are located in the Library Mechanical Equipment Building (Building 16), Classroom/Admin/Lab Building (Building 98) and the Mechanical Yard (Building 69). The Building 16 plant has four boilers to serve the Engineer Building (Building 9), Art/Engineering Annex (Building 13), Library (Building 15), Engineering Labs (Building 17) and Student Services Building (Building 121). The Building 98 plant has three boilers to serve Building 98 and the College of Business Administration (Buildings 162,163 and 164). The Building 69 plant has two boilers to serve all the Residential Suites (Buildings 54, 60, 61, 62 and 63).

4.19.1.2 Wastewater

The Cal Poly Pomona campus has a gravity flow sanitary sewer system that connects to the City of Pomona's municipal system near Temple Avenue and Valley Boulevard. The wastewater from the reverse osmosis plant flows in a gravity pipeline all the way to the LACSD wastewater main located in Spadra Farm near the North Flood Control Channel. The City's wastewater collection system includes about 317 miles of gravity sewers, four pump stations maintained by the LACSD, 1.4 miles of force mains, over 6,000 manholes, and two siphons (City of Pomona 2024).

Wastewater from the local sewer line is discharged to either or both of LACSD's Joint Outfall A-1A District 21 Interceptor Trunk Sewer, located in a right of way along the west side of Union Pacific Railroad south of Valley

Boulevard, or the District 21 Outfall Trunk Sewer, located in a right of way along the west side of San Jose Creek south of State Street. LACSD's 42-inch diameter Joint Outfall A-1A District 21 Interceptor Trunk Sewer has a capacity of 38.2 million gallons per day (mgd) and conveyed a peak flow of 13.6 mgd when last measured in 2022. LACSD's 27-inch diameter District 21 Outfall Trunk Sewer has a capacity of 19.3 mgd and conveyed a peak flow of 1.5 mgd when last measured in 2022 (Appendix A and Appendix H).

Wastewater generated by Cal Poly Pomona is treated at the A.K. Warren Water Resource Facility (formerly Joint Water Pollution Control Plant) located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 246.0 mgd, or the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average recycled flow of 62.6 mgd. All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the A.K. Warren Water Resource Facility (Appendix A and Appendix H).

4.19.1.3 Stormwater

The storm drain system for the Cal Poly Pomona campus is a gravity flow system. It flows primarily from northwest to southeast side of campus and connects to a concrete drainage wash that runs along the south side of South Campus Drive. This wash runs from northeast to southwest and is part of the overall Los Angeles County Regional drainage system, eventually making its way to the Pacific Ocean. There are portions of the campus that have a small, isolated drainage system. The Lyle Center for Regenerative Studies (Building 209) and the Arabian Horse Center (Building 29) are examples of these isolated systems. Building 209 has a small diameter drainage system that drains to ponds located around the facility. Building 29 has a small diameter system that appears to daylight to the fields directly south and the drainage water is allowed to flow over the fields.

4.19.1.4 Electrical

Most of the campus's electrical load comes from lighting, HVAC (heating, ventilation, and air conditioning), and the Chilled Water Plant. The campus buys all its electricity from Southern California Edison (SCE) through 12 different service accounts. One account serves the main campus via the University-owned 12.47 kilovolt (kV) Electrical Distribution Substation, which accounts for 98% of the electricity purchased. The remaining accounts serve remote sites like ranch houses, irrigation wells, pumps, and streetlights, making up 2% of the electricity purchased. The main utility service enters the campus from Temple Avenue, runs underground from University Drive and then along Eucalyptus Lane, until it reaches the Electrical Substation (Building 191), where it is metered at a 12.47 kV Main Switchgear. Electrical distribution in the campus core is all underground. Manholes have cable racks and hooks to support cables and splices.

The campus also has photovoltaic (PV) systems on Parking Lot M, Parking Structure 2, and the Kellogg Gymnasium (Building 43) Roof, totaling about 1.7 megawatts (MW), which offset part of the campus's total energy consumption. The PV system at Lyle Center is an older ground mount system with a tracker. The campus's annual energy consumption is 39,943,208 kilowatt-hours (kWh), with 8,044,179 kWh coming from solar PV (P2S 2021).

4.19.1.5 Natural Gas

The primary fossil fuel used at Cal Poly Pomona is natural gas, mainly for heating buildings, commercial kitchens, and laboratories. Natural gas is used to serve hot water boilers and domestic water heaters to provide space heating and domestic hot water needs on the main campus and University Farm. Natural gas is also used for dedicated

boilers at various campus buildings for generating steam and industrial hot water. Natural gas is supplied by Southern California Gas Company (SoCalGas) through a connection under South Campus Drive. The gas is routed through two metering stations, one is located behind the Engineering Labs (Building 17) and one is located at the southern corner of Parking Lot B.

From the main connection, a 6-inch line runs along the north side of South Campus Drive toward Citrus Lane, then branches off to Building 17 to supply campus buildings. The main line continues to Cedritos Hall (Building 58), to the University House (Building 112). Service lines to the east campus and Building 112 tap into the 6-inch main. A 10-inch main exits the metering station to the west toward Olive Lane, where it branches into a series of 6-inch and 4-inch lines serving the west campus.

University Village (Buildings 200, 201, and 205) is also provided natural gas by SoCalGas, but is not connected to the main distribution system located on campus. However, the southern main gas meter service line is routed through Parking Lots B, P and Q to serve the two new Residence Halls (Buildings 73 and 74) and the Centerpointe Dining Building (Building 72).

4.19.1.6 Telecommunications

Fiber optic cables were installed in 2003 to handle more data over longer distances. The main hub for these cables is in Building 98. From there, the cables spread out to key buildings like Old Administration (Building 1), the College Letters, Arts & Social Science (Building 5), and the Agricultural Engineering (Building 45). There are backup cables between Buildings 98, 1, and 5 to ensure reliability. However, Building 45 doesn't have these backup cables because it's farther away.

Most of the campus's old copper phone lines used to start from Building 1. Some lines start from Building 5. The largest cables used have 1,800 pairs of wires, and these are distributed to different buildings based on their needs and size. The cables are split into smaller groups in manholes.

4.19.1.7 Solid Waste

Solid Waste and Recycling

Cal Poly Pomona's solid waste is managed and hauled by Burrtec Waste Industries Inc. Nonrecyclable materials are taken to the West Valley Materials Recovery Facility in Fontana, a transfer facility. This facility can handle up to 7,500 tons of waste per day and has a capacity of 8,280 tons. It also has extra capacity for chipping, grinding, and small wood debris. The facility accepts various types of waste, including construction and demolition debris, green waste, industrial and mixed municipal waste, and wood waste (CalRecycle 2024). From the transfer facility the solid waste is then taken to Mid-Valley Sanitary Landfill with a remaining capacity of 54,219,377 cubic yards (cy), El Sobrante Landfill with a remaining capacity of 121,083,583 cy, or Badlands Sanitary Landfill with a remaining capacity of 4,900,000 cy (CalRecycle 2025a, CalRecycle 2025b, CalRecycle 2025c).

The Cal Poly Pomona Recycling Services Department is tasked with developing and implementing a comprehensive waste and recycling program. Working with the community, this unit oversees areas of waste prevention, recycling, composting, recycled product research, public education and campus recycling procedures. Consistent with the campus's ongoing recycling programs, all recyclable materials, generated as a result of construction/demolition are sent to the Mission Recycling Facility in Pomona. This facility is a for-profit entity that can meet the demands of an increased recyclable waste supply from Cal Poly Pomona.

Organic Waste

The Landscape Department collects green waste throughout the campus and places the materials into specialized dumpsters. The waste hauler then recycles the material into mulch. Pre-consumer waste refers to waste produced in the manufacture of a product. This includes raw material food that is never seen by the consumer (i.e., vegetable peels). Pre-consumer food composting is done at most campus dining facilities, including CenterPointe Dining.

Electronic Waste

Electronic waste (e-waste) refers to consumer and business electronic equipment, such as televisions, phones, or computers, which are near or at the end of useful life (Cal Poly Pomona 2022). Certain components of these e-waste items contain hazardous materials, such as cathode ray tubes from television and computer screens which contain lead, cadmium, and fluorescent powders.

Cal Poly Pomona's Facilities Planning and Management Department has a program to pick up and recycle used printer cartridges from Distribution Services. University Asset Management picks up tagged e-waste and the University Environmental Health and Safety Department (EH&S) picks up non-asset tagged e-waste and hazardous waste. Asset Management accepts tagged computer equipment and e-waste, including items such as computer monitors, visual display devices (televisions), computer towers and hard drives, personal digital assistants (iPads and tablets), printers (printer cartridges must be removed), fax machines, stereo/audio and video/DVD equipment. EH&S accepts e-waste from campus-generated sources. E-waste from off-campus and the public is not accepted at this time.

4.19.2 Regulatory Setting

4.19.2.1 Federal

Clean Water Act

The Clean Water Act (CWA) utilizes both regulatory and non-regulatory methods to minimize direct pollutant discharges into water bodies, support municipal wastewater treatment facility funding, and control polluted runoff. The U.S. Environmental Protection Agency (EPA) set primary drinking water standards under Section 304 of the CWA, which states must enforce to ensure safe drinking water for the public. Section 402 of the CWA establishes the National Pollutant Discharge Elimination System (NPDES) regulatory program, requiring point sources to obtain discharge permits from the appropriate authority, which could be a state, the EPA, a tribe, or a territory. NPDES permits regulate various industrial and municipal discharges, including those from large city storm sewer systems, industrial stormwater, construction site runoff disturbing over one acre, and mining operations. Indirect dischargers, who send wastewater to public sewer systems that then treat it at municipal sewage plants before it enters surface waters, do not need NPDES permits.

Safe Drinking Water Act

The Safe Drinking Water Act (Public Law 93-523), enacted in 1974, requires the EPA to regulate contaminants that affect domestic water supplies. These contaminants are identified as those that pose health risks or impact the water's aesthetic quality. The EPA sets primary and secondary maximum contaminant levels (MCLs) for these substances, with standards reviewed every three years. The 1986 amendments to the Act introduced a faster timeline for establishing MCLs. In California, the EPA has delegated the responsibility for the drinking water program

to the State Water Resources Control Board (SWRCB) Division of Drinking Water. This division is responsible for implementing the program and adopting standards and regulations that meet or exceed EPA requirements.

California Code of Regulations, Energy Efficiency

Energy use in new buildings in California is governed by the State Building Energy Efficiency Standards (CALGreen), found in the California Code of Regulations (CCR), Title 24, Part 2, Chapter 2-53. These standards apply to all new residential and nonresidential construction, regulating energy consumption for heating, cooling, ventilation, water heating, and lighting.

4.19.2.2 State

Water Supply Assessments

In 2001, Senate Bill (SB) 610 amended California law regarding review of water availability for large projects (Section 10910 et seq. of the Water Code; Section 21151.9 of the Public Resources Code [CEQA]; see also Section 15155 of the State CEQA Guidelines). Pursuant to SB 610, preparation of a "water supply assessment" (WSA) is required to be prepared by a city or county for projects subject to CEQA that meet specified criteria regarding project size: projects of 500 or more residential units, 500,000 square feet or more of retail commercial space, 250,000 square feet or more of office commercial space, 500 or more hotel rooms, specified industrial uses, or a project that would result in a water demand equal to or greater than the amount needed to serve a 500-unit residential project. These assessments, prepared by "public water systems" responsible for service, address whether there are adequate existing or projected water supplies available to serve proposed projects over a 20-year period, in addition to existing demand and other anticipated development in the service area.

The CSU determined that a WSA under SB 610 is not required for the proposed Master Plan because the CSU, as a state entity, is not required by law to prepare WSAs for projects undergoing CEQA review. CWC Section 10910 and the referenced CEQA provisions require only a "city or county," acting as a local lead agency under CEQA, to request a WSA and include it in a project EIR. However, the CSU determined that a WSE is warranted for the proposed Master Plan to assess water supplies and constraints related to the proposed Master Plan, based on the types of projects listed above that would require a WSA (see Appendix G).

Water Conservation Act of 2009

Requirements regarding per capita water use targets are defined in the Water Conservation Act of 2009 that was signed into law in November 2009 as part of a comprehensive water legislation package. Known as SB X7-7, the legislation sets a goal of achieving a 20% reduction in urban per capita water use statewide by 2020. SB X7-7 requires that retail water suppliers define in their 2010 urban water management plans the gallons-per-capita-per day targets for 2020, with an interim 2015 target.

Sustainable Groundwater Management Act

In 2014, California enacted the "Sustainable Groundwater Management Act" to bring the state's groundwater basins into a more sustainable regime of pumping and recharge. The legislation provides for the sustainable management of groundwater through the formation of local groundwater sustainability agencies (GSAs) and the development and implementation of groundwater sustainability plans (GSPs), and requires GSAs and GSPs for all groundwater basins identified by the DWR as high or medium priority. Additionally, the legislation establishes

criteria for the sustainable management of groundwater and authorizes DWR to establish best management practices for groundwater.

California Recycled Water Policy

On February 3, 2009, the SWRCB adopted a statewide recycled water policy, with the ultimate goal to increase the use of recycled water from municipal wastewater sources. Included in the statewide policy is the mandate to increase the use of recycled water in California by 200,000 acre-feet per year (AFY) by 2020, and an additional 300,000 AFY by 2030. The plan also states that the SWRCB expects to develop other policies to encourage stormwater, surface, and groundwater use to promote water conservation. The SWRCB adopted an amendment to the Recycled Water Policy on January 22, 2013, which establishes monitoring requirements for constituents of emerging concern in recycled municipal wastewater.

California Integrated Waste Management Act and Related Regulations

AB 939 established the California Integrated Waste Management Act of 1989 (Public Resources Code Section 40050 et seq.), which requires all California cities and counties to reduce the volume of solid waste deposited in landfills by 50% by 2000, and to continue to remain at 50% or more diversion for each subsequent year. The Act requires each California city and county to prepare, adopt, and submit to CalRecycle a Source Reduction and Recycling Element that demonstrates how the jurisdiction will meet the Act's mandated diversion rate. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity, as well as the authority and responsibilities of the California Integrated Waste Management Board (CIWMB), which administers the Act. In January 2010, the California Department of Resources Recycling and Recovery (CalRecycle) replaced the CIWMB.

In 1999, AB 75 required each state agency and large state facility to develop and adopt Integrated Waste Management Plans, implement programs to reduce waste disposal, and have their waste diversion performance annually reviewed by CalRecycle (Public Resources Code Sections 40148, 40196.3, 41821.2, and Chapter 18.5 [Section 42920 et seq.]). AB 75 also requires all state agencies and large state facilities to divert at least 25%of their solid waste from landfills by January 1, 2002, and at least 50% on and after January 1, 2004. The CSU is defined as a "state agency" in Public Resources Code Section 40196.3 and the campuses of the CSU are defined as "large state facilities" in Public Resources Code 40148; therefore, this requirement applies to the proposed Master Plan.

AB 341, adopted in October 2011, also amended the California Integrated Waste Management Act and established a statewide policy goal to divert 75% of solid waste from landfills by 2020. AB 341 focused on mandatory commercial recycling, and requires California commercial enterprises and public entities that generate 4 or more cubic yards per week of waste, as well as multi-family housing complexes with 5 or more units, to arrange for recycling services. As a public entity, CSU is required to adhere to the requirements described.

Mandatory commercial recycling was one of the measures adopted in the AB 32 Scoping Plan by the California Air Resources Board, pursuant to the California Global Warming Solutions Act (Chapter 488, Statutes of 2006, codified at California Health & Safety Code Section 38500 et seq.). (AB 32 is further described below.) The mandatory commercial recycling measure is focused on increasing waste diversion from commercial uses to reduce greenhouse gas emissions (greenhouse gas resulting from decomposition of organic waste in landfills has been identified as a significant source of emissions contributing to global climate change). The measure establishes an objective of reducing greenhouse gas emissions by 5 million metric tons of carbon dioxide

equivalent. To meet this objective, the commercial sector will be required to recycle an additional 2 to 3 million tons of materials annually by 2020. This regulation reflects the statutory provisions of AB 341 and provides additional procedural clarifications.

Mandatory Commercial Organics Recycling

AB 1826, the Mandatory Commercial Organics Recycling Act (Public Resources Code Section 42649.8), adopted in 2014, requires businesses, including public entities, to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate on a weekly basis. Additionally, AB 1826 requires that, after January 1, 2016, all local jurisdictions implement an organic waste recycling program to divert organic waste generated by businesses, including multi-family residential dwellings with five or more units. Organic waste includes food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. This law phases in the mandatory recycling of commercial organics over time. As a public entity, CSU is required to adhere to the requirements described.

Assembly Bill 2812

As of January 1, 2017, pursuant to AB 2812 (Public Resources Code Sections 42924.5 and 42926), each state agency, including CSU, is required to provide adequate receptacles, signage, education, and staffing, and arrange for recycling services consistent with existing recycling requirements for each office building of the state agency or large state facility. The bill also requires, at least annually, a review of the adequacy and condition of the receptacles for recyclable material and associated signage, education, and staffing.

Assembly Bill 1668

Assembly Bill 1668 (California Water Code § 10609), enacted in 2018, sets long-term standards for efficient water use in California, including on California State University campuses. The bill establishes indoor residential water use standards, starting at 55 gallons per capita daily until 2025, then reducing to 50 gallons per capita daily by 2030. It requires the SWRCB and DWR to adopt long-term water use standards for various sectors, including commercial, industrial, and institutional, by June 30, 2022. Additionally, AB 1668 mandates the development of urban water use targets and performance measures, including steps to develop sustainable, drought tolerant or native landscaping, reduce turf, install controls to optimize irrigation water use, reduce water usage in restrooms, showers, fountains and decorative water features, and promote the use of reclaimed/recycled water (CSU 2024).

Warren–Alquist Act

The California Legislature passed the Warren–Alquist Act in 1974. The Warren–Alquist Act was created by the California Energy Commission (CEC). The legislation also incorporated the following three key provisions designed to address the demand side of the energy equation:

- It directed the CEC to formulate and adopt the nation's first energy conservation standards for both buildings constructed and appliances sold in California.
- The Act removed the responsibility of electricity demand forecasting from the utilities, which had a financial interest in high demand projections, and transferred it to a more impartial CEC.
- The CEC was directed to embark on an ambitious research and development program, with a particular focus on fostering what were characterized as non-conventional energy sources.

CSU Sustainability Policy

CSU has identified sustainability as a system-wide priority, as detailed in the CSU Sustainability Policy, which was adopted in 2014 and was last reviewed and updated in 2024. The CSU Sustainability Policy focuses mainly on energy and GHG emissions and largely aligns with the State of California's energy and GHG emissions reduction goals (CSU 2024). The policy aims to reduce the environmental impact of construction and operation of buildings and to integrate sustainability across the curriculum. Table 4.19-1 includes a summary of the CSU Sustainability Policy and associated goals.

Table 4.19-1 CSU Sustainability Policy

University Sustainability
1. The CSU will develop employee and student workforce skills in the green jobs industry, promote the development of sustainable products and services, and foster economic development.
2. The CSU will seek to further integrate sustainability into the academic curriculum.
3. The CSU will pursue sustainable practices in all areas of the university.
4. Each CSU is encouraged to designate a sustainability officer responsible for campus sustainability programs.
Climate Action Plan
1. The CSU will strive to reduce systemwide facility greenhouse gas (GHG) emissions to 40% below 1990 levels consistent with Assembly Bill (AB) 32, California's Global Warming Solutions Act of 2006.
2. The CSU will strive to reduce facility GHG emissions to 80% below 1990 levels by 2040, and achieve carbon neutrality by 2045 in accordance with Statewide mandates.
3. The CSU will encourage and promote the use of alternative transportation and/or alternative fuels.
Energy Resilience and Procurement
1. The CSU shall pursue energy procurement and production. The CSU shall endeavor to increase its self-generated energy capacity from 32 to 80 megawatts (MW) by 2030.
2. The CSU will consider cost effective opportunities to exceed the State of California and California Public Utilities Commission (CPUC) Renewable Portfolio Standard (RPS) sooner than the established goal of procuring 60% of its electricity needs from renewable sources by 2030 consistent with SB 100.
3. The CSU will endeavor to exceed the State of California and CPUC RPS sooner than the established goal of procuring 60% of its electricity needs from renewable sources by 2030 consistent with SB 100.
4. Campuses will transition from fossil-fuel sourced equipment to electric equipment as replacements or renovations are needed. Any in-kind fossil-fuel sourced equipment will be justified through an analysis which demonstrates why that solution represents the most cost-effective option and what alternatives were analyzed for comparative purposes. No new investment in, or renewal of, natural gas assets or infrastructure as part of campus projects starting July 1, 2035, with the exception of critical academic program needs.
Energy Conservation and Utility Management
1. All CSU buildings and facilities will be operated in the most energy efficient manner.
2. All CSU campuses will continue to identify energy efficiency improvement measures to the greatest extent possible.
3. The CSU will cooperate with federal, state, and local governments and other appropriate organizations in accomplishing energy conservation and utilities management objectives throughout the state.
4. Each CSU campus will designate an energy/utilities manager with the responsibility and the authority for carrying out energy conservation and utilities management programs.

Table 4.19-1 CSU Sustainability Policy

5. The CSU will monitor monthly energy and utility usage on all campuses and will prepare a systemwide annual report on energy utilization and GHG emissions.
6. Each CSU campus is encouraged to develop and maintain an integrated strategic energy resource plan.
Water Conservation
1. All CSU campuses will pursue water resource conservation to reduce water consumption by 10% by 2030 consistent by AB 1668, including such steps to develop sustainable landscaping, reduce turf, install controls to optimize irrigation water use, reduce water usage in restrooms and showers, and promote the use of reclaimed/recycled water.
Waste Management
1. Campuses shall seek to reduce the rate of landfill bound waste to 50% of total campus waste by 2030, divert at least 80% by 2040, and move toward zero waste.
2. The CSU will encourage the reduction of hazardous waste while supporting the academic program.
Sustainable Procurement
1. Campuses will promote use of suppliers and/or vendors who reduce waste and re-purpose recycled material.
2. Campus practices should encourage use of products that minimize waste sent to landfills or incinerators, participate in the CalRecycle Buy-Recycled program or equivalent, and increase recycled content purchases in all Buy-Recycled program product categories.
3. Campuses shall continue to report on and track all recycled content product categories.
4. Campuses shall align procedures with state initiatives to report environmental product declarations for select construction materials.
5. Promote circular economies by seeking to reduce waste when considering materials purchases such as office/classroom supplies or equipment by minimizing purchase of items with a short useful life, are unable to be recycled, and/or are made of unsustainable or carbon intensive materials.
Sustainable Food Service
1. Campuses shall strive to increase their sustainable food purchases to 20% of total food budget by 2020.
2. Campuses shall collaborate to provide information and/or training on sustainable food service operations.
Sustainable Building Practices
1. All future CSU new construction, remodeling, renovation, and repair projects will be designed with consideration of optimum energy utilization, low life cycle operating costs, and compliance with all applicable energy regulations.
2. Capital Planning, Design and Construction in the Chancellor's Office shall monitor building sustainability/energy performance, based on Leadership in Energy and Environmental Design (LEED) principles.
3. Existing building energy performance will be optimized through improved operation, maintenance and repair, and capital improvement, enabling campuses to meet carbon reduction goals.
4. The CSU shall design and build all new buildings and major renovations to meet or exceed the minimum requirements equivalent to LEED "Silver."
Physical Plant Management
1. Each campus shall operate and maintain a comprehensive energy management system.
2. Campus energy/utilities managers will make the necessary arrangements to achieve optimum efficiency in the use of natural gas, electricity, or any other purchased energy resources to meet the heating, cooling, and lighting needs of facilities, striving to adhere to Statewide energy efficiency guidance

Table 4.19-1 CSU Sustainability Policy

	regarding appropriate indoor temperature setpoints. Simultaneous heating and cooling operations to maintain specific temperatures in work areas will not be allowed unless special operating conditions dictate them.
3.	To the extent possible, programs will be consolidated to achieve the highest building utilization.
4.	All CSU campuses will implement a utilities chargeback system to recover direct and indirect costs of utilities.
Transportation	
1.	The CSU will encourage and promote the use of alternative transportation and/or alternative fuels for university-associated transportation, including commuter and business travel.
2.	CSU campuses shall develop and maintain a transportation demand management (TDM) plan, updated every five years, to reduce Vehicle Miles Traveled (VMT) and carbon emissions.
3.	Campuses shall strive to increase EV, e-bike, and other electric mobility and transportation device charging infrastructure and incentive programs.
4.	Campuses shall strive to develop and maintain a long-range plan for transitioning fleet and ground equipment to zero emissions. 50% of all light duty vehicle purchases will be ZEV by 2025, with no addition of gas-powered light duty vehicles to the fleet after 2035. All small off-road engine equipment used for campus grounds will be electric by 2035. All buses and heavy-duty vehicles will be ZEV by 2045.

4.19.2.3 Local

As a state entity, Cal Poly Pomona is not subject to local government permitting or regulations, policies, or ordinances, such as the general plans and ordinances for the City of Pomona, City of Walnut, or the County of Los Angeles. Because Cal Poly Pomona is not subject to local general plans or other local land use plans and/or ordinances, these regulations are not summarized here or further analyzed in this section. However, as described in Section 4.1.1, Environmental Setting, the local general plans were reviewed as they provide some description of local utilities.

4.19.3 Thresholds of Significance and Methodology

4.19.3.1 Thresholds of Significance

In determining whether a project may have a significant effect on the environment, CEQA Guidelines Section 15064.7 provides that lead agencies may adopt and/or apply "thresholds of significance." A threshold of significance is "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant" (CEQA Guidelines §15064.7). The significance criteria used to evaluate the proposed Master Plan's impacts to utilities and service systems are based on CEQA Guidelines Appendix G. For the purposes of this proposed Master Plan, a potentially significant impact to utilities and service systems would occur if the proposed Master Plan would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

2. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
3. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
4. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

4.19.3.2 Methodology

A desktop analysis was conducted to characterize the existing utilities and service systems currently on the Cal Poly Pomona campus. Using proposed student, staff, and faculty headcount projections, and the anticipated facility buildout of the proposed Master Plan, impacts to utilities and services systems are analyzed accordingly.

The WSE prepared for this EIR as provided in Appendix G, was used in this section to evaluate whether the proposed Master Plan would require additional water supplies such that expanded water supply facilities would be warranted. In addition, as detailed in Section 4.3, Air Quality, modeling was conducted for the purposes of analyzing air quality impacts and produced estimates for the proposed Master Plan's solid waste generation rates at full buildout. Wastewater generation totals were provided by LACSD in their NOP comment letter (Appendix A). These estimates were used to analyze the potential impacts related to wastewater treatment capacities and landfill capacities.

4.19.4 Impact Analysis

4.19.4.1 Project Impacts

Impact 4.19-1 The project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. (Less than Significant)

Program-Level Analysis for Master Plan

Water

Cal Poly Pomona has four existing groundwater wells: one for the purpose of supplying potable water, one that is inactive due to water quality issues, and the other two are used for farm irrigation and landscaping. Water for the proposed Master Plan is assumed to be supplied from the existing on-site well but could also be supplemented with imported water purchased from TVMWD. The proposed Master Plan would result in the expansion of Cal Poly Pomona's existing groundwater well by increasing the capacity of the water treatment plant. Specifically, the proposed Well Water and Water Treatment Plant Expansion project would involve the installation of a volatile organic compound wellhead treatment system at Well 2 (currently inactive) to expand the availability of source groundwater for potable use. It would include the repairs or replacement of existing controllers and sensors, and the upgrade of the Supervisory Control and Data Acquisition system and to add an additional reverse osmosis water treatment train to expand the system capacity to produce an additional 300,000 gallons per day of domestic water.

The treatment system currently has capacity to treat 792,000 gallons per day. Additionally, the Lower Reservoir Tank Replacement project would involve the construction of a new domestic water reservoir tank, which would involve the installation of a new 570,000-gallon welded steel tank to replace the existing lower reservoir tank. The tank would be installed at the same location as the existing tank at the lower reservoir site. The new tank would provide the domestic water storage needed for distribution and it would provide for backup storage. The new water storage tank would supply water to the fire suppression system. The existing tank would be demolished and removed accordingly. In addition to the expansion of the existing well water and water treatment plant and the construction of a new domestic water reservoir tank, the proposed Master Plan would include an extension of the Spadra well waterline. The proposed Master Plan would not require the relocation of any existing water facilities.

According to the WSE prepared for the Master Plan, and as discussed in more detail under Impact 4.19-2, TVMWD has sufficient supplies to meet projected demands out to 2045 under normal, single dry year, and multiple dry year scenarios (Appendix G). As an existing recipient of imported water, there are already existing connections to receive TVMWD imported water. As a result, TVMWD would be able to continue to provide water supplies without the need to upgrade or expand any water facilities at Cal Poly Pomona.

While the proposed Master Plan would require the construction of the aforementioned water improvements, which have the potential to cause environmental effects, construction of the proposed wellhead treatment system (Well Water and Water Treatment Plant Expansion project) and the Lower Reservoir Tank Replacement are part of the Master Plan that have been accounted for in the other technical sections of Chapter 4 of this EIR. There are no unique impacts associated with the installation of water infrastructure to serve the proposed Master Plan that have not been otherwise discussed and accounted for in this EIR. Therefore, impacts of the proposed Master Plan associated with the construction of water facilities would be **less than significant**.

Wastewater

The wastewater flow originating from the proposed Master Plan development would continue to operate, as described in Section 4.19.1.2.

The wastewater generated by the proposed Master Plan would be treated at the A.K. Warren Water Resource Facility (formerly Joint Water Pollution Control Plant) located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 246.0 mgd, or the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average recycled flow of 62.6 mgd (Appendix A and Appendix H). The expected increase in average wastewater flow from the proposed Master Plan, as provided by LACSD is 161,700 gpd for an anticipated net increase in student headcount of 8,085. Assuming the proposed Master Plan generates 161,700 gpd, this would fall well within the capacities listed above. As such, no new or expanded wastewater treatment facilities would be required to accommodate the proposed Master Plan and the impacts would be **less than significant**.

Stormwater

Implementation of the proposed Master Plan would include some changes to existing drainage patterns and existing storm drainage improvements, which have the potential to cause environmental effects associated with buildout of the Master Plan as a whole. The storm drainage improvements, however, have been considered as part of the Master Plan, and have been accounted for in the other technical sections of Chapter 4 of this EIR. There are no unique impacts associated with the installation of storm drain improvements to serve the proposed Master Plan

that have not been discussed and accounted for in this document. Therefore, impacts of the proposed Master Plan associated with stormwater drainage facilities would be **less than significant**.

See Section 4.11, Hydrology and Water Quality, for additional information.

Electric Power

The proposed Master Plan would expand on-campus renewable energy production with the installation of solar photovoltaic (PV) systems. New construction and renovation projects under the proposed Master Plan would comply with all applicable energy codes and regulations (Building Energy Efficiency Standards, Title 24). Additionally, in accordance with the 2024 CSU Sustainability Policy (see Table 4.19-1), all new buildings and major building renovations would be designed and built to meet or exceed the minimum requirements equivalent to Leadership in Energy and Environmental Design (LEED) Silver.

The proposed Master Plan would include energy efficiency and infrastructure improvements that would address Master Plan demands. As such, new or expanded off-site electric power facilities would not be needed, as a result of the Master Plan. Therefore, impacts of the proposed Master Plan related to electrical power facilities would be **less than significant.**

See Section 4.7, Energy, for information about electrical power usage.

Natural Gas

As discussed, natural gas is used to serve hot water boilers and domestic water heaters to provide space heating and domestic hot water needs on the main campus and University Farm. Natural gas is also used for dedicated boilers at various campus buildings for generating industrial hot water. University Village is also provided natural gas by SoCalGas but is not connected to the main distribution system located on campus. No changes are proposed for University Village that would increase natural gas usage.

While natural gas repairs and upgrades would be implemented as part of proposed Master Plan development, natural gas usage would not increase such that SoCalGas would need to build new or expanded facilities to accommodate the proposed Master Plan. Additionally, the increase in natural gas usage would be minimized with compliance with the CSU Sustainability Policy, which indicates that no new investment in, or renewal of, natural gas assets or infrastructure would be pursued as part of campus projects starting July 1, 2035, except for critical academic program needs (see Table 4.19-1). As such, impacts of the proposed Master Plan related to new or expanded natural gas facilities would be **less than significant**.

See Section 4.7, Energy, for information about natural gas usage.

Telecommunication

Any improvements needed to the telecommunications system would be completed as part of the proposed Master Plan within the campus and would not result in the need for new or expanded off-site telecommunications facilities. As such, impacts of the proposed Master Plan related to new or expanded telecommunications facilities would be **less than significant**.

Project-Level Analysis for Near-Term Projects

The above discussion for the proposed Master Plan also applies to the near-term projects, because it considers the growth of all Master Plan projects and near-term projects, and student, staff, and faculty growth. Impacts of the near-term projects related to the construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities would be **less than significant**.

Impact 4.19-2 The project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. (Less than Significant)

Program-Level Analysis for Master Plan

Water supply for the proposed Master Plan would most likely be supplied by the existing on-site well. This well draws from the San Gabriel Groundwater Basin - Spadra Subbasin (DWR Basin No. 4-013) (Cal Poly Pomona 2024a). Cal Poly Pomona has its own water treatment plant that treats the groundwater on-site. Groundwater is an important water source for the region and it is assumed groundwater would make up most of the water supplies for the Master Plan, although Cal Poly also relies on imported water to meet demand.

Cal Poly Pomona Supply

Cal Poly Pomona is not considered an urban water supplier and is not required to submit an Urban Water Management Plan, however, the Spadra Basin GSP contains actual and projected water supply numbers for Cal Poly Pomona (Table 4.19-2).

Table 4.19-2 Current and Projected Water Supply for Cal Poly Pomona

	Actual (AF)	Projected (AF)				
Water Sources	2020	2025	2030	2035	2040	2045
Spadra Basin	591	817	856	856	856	856
Imported Water Purchased from TVMWD	118	43	9	9	9	9
Recycled Water	911	1,000	1,000	1,000	1,000	1,000
Total	**1,621**	**1,860**	**1,865**	**1,865**	**1,865**	**1,865**

Source: Spadra Basin GSA 2022
Notes: AF = acre-feet; 1 acre-foot = 325,851 gallons.

Projections from 2025 onward indicate reliance primarily on groundwater pumped from the Basin and a reduction of water purchased from TVMWD. This has been verified by Cal Poly Pomona as they have indicated a desire to use local water sources as opposed to relying on imported water. Under the proposed Master Plan, imported water from TVMWD would be used only as an emergency backup.

TVMWD Demand and Supplies

Because Cal Poly Pomona is within the service boundary of TVMWD and relies on them for imported water from the MWD, the water supply and demand projections from the 2020 TVMWD UWMP are analyzed accordingly. Actual and projected water demand and supplies for TVMWD are included in Tables 4.19-3 through Table 4.19-5. These projections were taken from the 2020 UWMP and show the actual and projected supply and demand estimates for

a normal water year in 5-year increments. Table 4.19-6 and Table 4.19-7 show the estimates for a single dry year and multiple dry years, respectively. The supply and demand differences are zero as TVMWD only supplies the amount of water necessary to serve the demand in any given year.

Table 4.19-3. Current and Projected Water Demand for Normal Year for TVMWD

	Actual (AF)	Projected (AF)				
Water Sources	2020	2025	2030	2035	2040	2045
Demand						
Sales to Other Agencies	60,031	45,394	45,304	45,194	45,010	44,806
Groundwater Recharge	14,523	10,982	10,960	10,934	10,889	10,840
Other Potable	2,169	1,640	1,637	1,633	1,626	1,619
Total	**76,723**	**58,016**	**57,901**	**57,761**	**57,525**	**57,265**

Source: TVMWD 2021
Notes: AF = acre-feet; 1 acre-foot = 325,851 gallons.

Table 4.19-4. Current and Projected Water Supply for Normal Year for TVMWD

	Actual (AF)	Projected (AF)				
Water Sources	2020	2025	2030	2035	2040	2045
Supply						
Groundwater (not desalinated)	1,200	2,500	3,000	3,000	3,000	3,000
Purchased or Imported Water	73,354	52,516	51,401	51,261	51,025	50,765
Other Potable	2,169	3,000	3,500	3,500	3,500	3,500
Total	**76,723**	**58,016**	**57,901**	**57,761**	**57,525**	**57,265**

Source: TVMWD 2021
Notes: AF = acre-feet; 1 acre-foot = 325,851 gallons.

Table 4.19-5. Projected Water Supply and Demand Comparison for Normal Year for TVMWD

	Projected (AF)				
Supply/Demand	2025	2030	2035	2040	2045
Total Water Demand	58,016	57,901	57,761	57,525	57,265
Total Potable Supply	58,016	57,901	57,761	57,525	57,265
Difference	**0**	**0**	**0**	**0**	**0**

Source: TVMWD 2021
Notes: AF = acre-feet; 1 acre-foot = 325,851 gallons.

Table 4.19-6. Projected Water Supply and Demand Comparison for Single Dry Year for TVMWD

	Projected (AF)				
Supply/Demand	2025	2030	2035	2040	2045
Total Water Demand	57,344	57,230	57,091	56,859	56,601

Table 4.19-6. Projected Water Supply and Demand Comparison for Single Dry Year for TVMWD

Supply/Demand	Projected (AF)				
	2025	2030	2035	2040	2045
Total Potable Supply	57,344	57,230	57,091	56,859	56,601
Difference	0	0	0	0	0

Source: TVMWD 2021
Notes: AF = acre-feet; 1 acre-foot = 325,851 gallons.

Table 4.19-7. Projected Water Supply and Demand Comparison for Multiple Dry Years for TVMWD

Year	Projected (AF)					
		2025	2030	2035	2040	2045
First Year	Supply Totals	54,248	54,140	54,009	53,789	53,545
	Demand Totals	54,248	54,140	54,009	53,789	53,545
	Difference	0	0	0	0	0
Second Year	Supply Totals	59,906	59,787	59,642	59,399	59,130
	Demand Totals	59,906	59,787	59,642	59,399	59,130
	Difference	0	0	0	0	0
Third Year	Supply Totals	62,156	62,032	61,882	61,630	61,350
	Demand Totals	62,156	62,032	61,882	61,630	61,350
	Difference	0	0	0	0	0
Fourth Year	Supply Totals	52,212	52,108	51,981	51,770	51,535
	Demand Totals	52,212	52,108	51,981	51,770	51,535
	Difference	0	0	0	0	0
Fifth Year	Supply Totals	48,122	48,026	47,910	47,715	47,498
	Demand Totals	48,122	48,026	47,910	47,715	47,498
	Difference	0	0	0	0	0

Source: TVMWD 2021
Notes: AF = acre-feet; 1 acre-foot = 325,851 gallons.

In each of the projection scenarios (normal year, single-dry year, multiple-dry years), TVMWD anticipates being able to meet the supply needs within their service boundary. Since TVMWD relies on purchasing water from MWD for the majority of their supply, they are reliant on MWD to allocate water appropriately. MWD adopted a Water Supply Allocation Plan in 2008 in order to manage its supplies to member agencies that involves reduction levels based on extended periods of drought (TVMWD 2021). Similar to the Water Shortage Contingency Plan described in the WSE, this involves a reduction of water supply from 5 to 50% to member agencies in order to maintain sustainable delivery. Within the TVMWD service area, population growth is expected to increase approximately 9.37% from 2020 to 2045 (Table 4.19-8).

Table 4.19-8. TVMWD Service Area Population Projections

Population Served	2020	2025	2030	2035	2040	2045
	513,623	523,167	532,888	542,790	552,204	561,782

Source: TVMWD 2021

Spadra Basin Groundwater Supply and Demand

The Basin is currently not artificially replenished by its users including Cal Poly Pomona, WVWD, and the City of Pomona. The aquifers rely on replenishment strictly from deep percolation and subsurface inflows and outflows (City of Pomona 2021). Despite this, the City of Pomona has used climate tools provided by the California Energy Commission to identity future climate change cycles for the Basin. The City used a Representative Concentration Pathway 4.5 scenario and average conditions for General Circulation Models. Both of these choices represent a moderate climate change forecast and not an extreme scenario. Based on the simulations, annual rainfall within the Basin is projected to be 18.73 inches through 2045, compared to the historical average of 16.99 inches (from 1950 to 2019). While it is difficult to forecast intensity of future rainfall, the indication of increased precipitation is positive for the Basin that requires percolation (City of Pomona 2021).

Cal Poly Pomona, WVWD, and the City of Pomona are historic pumpers of groundwater from the Basin. Table 4.19-9 shows the actual amount of groundwater pumped from the Basin from 2019 and 2020 as well as projected pumping demand from 2025 to 2045 for all three water purveyors. According to the projections, all water purveyors show increased groundwater pumping from 2025 to 2045 when compared to the average of groundwater pumped from 2019 and 2020 (with the exception of WVWD in 2020).

Table 4.19-9. Actual and Projected Groundwater Supply from the Spadra Basin 2019-2045

Water Purveyor	Actual and Projected Supply (AF)						
	2019	2020	2025	2030	2035	2040	2045
Cal Poly Pomona	735	591	817	856	856	856	856
WVWD	53	110	105	105	105	105	105
City of Pomona	0	0	1,000	845	845	845	845
Total	**788**	**701**	**1,922**	**1,806**	**1,806**	**1,806**	**1,806**

Source: WVWD 2021, City of Pomona 2021
Notes: AF = acre-feet; 1 acre-foot = 325,851 gallons.

A groundwater model was created for the Basin as part of the GSP process to determine the annual developed yield (also known as sustainable yield). This estimate is based on historical data from 1978 to 2018 and represents the average annual amount of groundwater that can be extracted without leading to adverse effects. According to the Spadra Basin GSP, the Basin's annual developed yield is estimated to be approximately 1,430 AFY based on data from 1978 to 2018. Between 2019 and 2079 the annual developed yield is anticipated to increase to an average of 1,622 AFY (Spadra Basin GSA 2022). Projected annual developed yield compared to projected groundwater pumping estimates within the Basin during the buildout period for the proposed Master Plan can be seen in Table 4.19-10.

Table 4.19-10. Projected Annual Developed Yield

Parameter	Projected (AF)				
	2025	2030	2035	2040	2045
Annual Developed Yield	1,236	1,543	1,655	1,699	1,713
Groundwater Pumping	1,922	1,806	1,806	1,806	1,806

Table 4.19-10. Projected Annual Developed Yield

Parameter	Projected (AF)				
	2025	2030	2035	2040	2045
Difference	-686	-263	-151	-107	-93

Source: Spadra Basin GSA 2022
Notes: AF = acre-feet; 1 acre-foot = 325,851 gallons.

In each of the projected years, the pumping is anticipated to be greater than the annual developed yield indicating a potential for Basin overdraft, however, the path to a sustainable yield for the Basin is shown to increase over time.

According to the 2022 GSP, Spadra Basin stakeholders used the model results of the Baseline Scenario to guide the development of several projects and management actions to achieve sustainability. These projects were split into three scenarios that include the use of surplus recycled water from the Pomona Water Reclamation Plant to achieve the objectives of the scenarios. The Basin Optimization Scenarios are as follows:

- Basin Optimization Scenario 1 - Sustainability through Substitution. This scenario includes reduced groundwater pumping and additional recycled water reuse.
- Basin Optimization Scenario 2 - Sustainability through Recharge. This scenario includes artificial recharge of 500 AFY of recycled water. Executive Summary K-C-954-80-20-01-WP-R ES-7 Spadra Basin Groundwater Sustainability Agency Groundwater Sustainability Plan for the Spadra Basin January 2022
- Basin Optimization Scenario 3 - Maximum Beneficial Use. This scenario includes artificial recharge of 3,500 AFY of recycled water, increasing production by a similar amount, and expansion of the CPP reverse osmosis plant. The pumped groundwater will be treated at the plant and used for potable water supplies, which reduces the demand for imported water and increases potable water-supply reliability.

The model evaluation of the Basin Optimization Scenario 3 indicates that the Sustainability Goal will be achieved within 20 years and throughout the rest of the planning horizon through implementation of the projects envisioned in Basin Optimization Scenario 3. This scenario is the recommended scenario for GSP implementation.

Proposed Master Plan Water Demand

Water demand for the construction phase of the Master Plan was estimated to be 15 AFY, or a total of 225 AF over a 15-year buildout period. The primary use of water during construction is most often for soil compaction and dust control and is limited to use within the footprint of development. Concrete work and other general construction activities such as washing and worker needs add additional water demand. Construction for the proposed Master Plan is expected to occur in phases over a 15-year period, thus limiting construction-related water demand in any single year.

Water demand for the operations and maintenance (O&M) phase can be forecast using recent Cal Poly Pomona water demand and using headcount projections for enrollment and faculty and staff population. Student enrollment at Cal Poly Pomona is measured using full-time equivalent students (FTES). At Cal Poly Pomona, one undergraduate FTES is equal to 15 units. FTES is generally the most appropriate measure of student population at the campus, as opposed to headcount, because it provides a more accurate representation of the population that would be on-campus at a given time. However, for the purposes of the WSE that was prepared for the proposed Master Plan (Appendix G), student, faculty, and staff headcount is considered the preferred metric for purposes of analyzing population changes for a project of this nature. Part-time students enrolling at Cal Poly Pomona could relocate from

outside the area and would be considered new residents. Using headcount instead of FTES also allows for a more conservative water demand estimate so the appropriate parties can better plan their water supply.

Cal Poly Pomona estimates that the current water use on a typical school day is 489,000 gallons per day (gpd) or 548 AFY, which would increase with the proposed Master Plan (Cal Poly Pomona 2024a). Using the Fall 2023 headcount population for both students, faculty and staff, the current campus water demand is estimated at approximately 16.76 gpd per person (489,000 gpd/29,177 total population) (Appendix G). With the expected total increase in student, faculty, and staff headcount of 8,964, the increase in water demand as a result of the Master Plan would be 150,237 gpd or 168 AFY. Total water use for Cal Poly Pomona after buildout of the proposed Master Plan would be approximately 639,243 gpd or 717 AFY. This is a conservative estimate that does not necessarily account for compliance with the CSU Sustainability Policy related to water conservation. This policy requires all CSU campuses to pursue water resource conservation to reduce water consumption by 10% by 2030 consistent by AB 1668, including such steps to develop sustainable landscaping, reduce turf, install controls to optimize irrigation water use, reduce water usage in restrooms and showers, and promote the use of reclaimed/recycled water.

Table 4.19-11 shows the total net-increase in water demand for the construction phase and the O&M phase of the proposed Master Plan. This WSE for this Master Plan assumes that water demand for the construction phase will take place prior to 2040 and the O&M phase will begin in 2040 once the buildout phase is completed (Appendix G).

Table 4.19-11. Projected Net-Increase in Water Demand for the Proposed Master Plan

Parameter	Projected (AFY) [a]				
	2025	2030	2035	2040	2045
Construction and O&M Water Demand	15	15	15	168	168

Notes: AF = acre-feet; 1 acre-foot = 325,851 gallons.

[a] Water demand is estimated to average 15 AFY for construction activities from 2025 to 2040. Water demand from 2040 assumes proposed Master Plan buildout and full net increase in Cal Poly Pomona population as a result of the proposed Master Plan.

The current capacity of potable water system for Cal Poly Pomona is 792,000 gpd or approximately 887 AFY. With the system upgrades, the capacity is anticipated to increase 300,000 gpd for a total of approximately 1,223 AFY once the proposed Master Plan is completed (Table 4.19-12). Given the total campus water demand projection of 717 AFY once the proposed Master Plan is complete, Cal Poly Pomona will be able to meet the increased demand with the infrastructure upgrades outlined in the proposed Master Plan (Table 4.19-12).

Table 4.19-12. Comparison of Capacity and Water Demand before and after Proposed Master Plan

Parameter	Actual and Projected (AFY)	
	2023 [a]	2040 [b]
Total Capacity	887	1,223
Total Demand	548	717

Notes: AF = acre-feet; 1 acre-foot = 325,851 gallons.

[a] Current capacity and water demand estimated by Cal Poly Pomona as of Fall 2023.

[b] Projected capacity and water demand as a result of the proposed Master Plan.

This estimate of 717 AFY is 139 AFY less than the projected 856 AFY that was used for the Spadra Basin's GSP (Appendix G). However, the Spadra Basin is in overdraft as of 2020 and will continue to be in overdraft if all three

water purveyors (Cal Poly Pomona, WVWD, and the City of Pomona) pump water according to the GSP projections. By 2040, the annual developed yield is anticipated to increase due to a reduction of pumping from the City of Pomona and the potential for greater precipitation events. Assuming Cal Poly Pomona, the City of Pomona, and WVWD can manage their pumping from the Basin to be below projections, the Basin will be able to support their demands. As the Basin currently has no artificial recharge and relies only on deep percolation from precipitation, the groundwater levels must be monitored in order to ensure sustainability. The GSP outlines sustainability criteria to do so. The WSE prepared for the proposed Master Plan concludes that based on the available information, the Master Plan is expected to have sufficient water available during normal, single dry, and multiple dry years over a 20-year projection (Appendix G).

Based on the water supply and demand estimates as provided in the WSE prepared for the Master Plan, Cal Poly Pomona would be able to meet drinking water demands for the increased headcount resulting from the proposed Master Plan. In addition, for the normal year, single-dry year, multiple dry years projected scenarios, TVMWD anticipates being able to meet the supply needs within their service boundary (Appendix G). Therefore, impacts of the proposed Master Plan related to water supply would be **less than significant**.

Project-Level Analysis for Near-Term Projects

The above discussion for the proposed Master Plan also applies to the near-term projects, because it considers the growth of all Master Plan projects and near-term projects, and associated student, staff, and faculty growth. Therefore, impacts of the near-term projects related to water supply would be **less than significant**.

Impact 4.19-3 The project would not result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. (Less than Significant)

Program-Level Analysis for Master Plan

As discussed previously, the wastewater generated by the proposed Master Plan would be treated at the A.K. Warren Water Resource Facility (formerly Joint Water Pollution Control Plant) located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 246.0 mgd, or the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average recycled flow of 62.6 mgd. The expected increase in average wastewater flow from the proposed Master Plan, as provided by LACSD, is 161,700 gpd, falling well within the capacities listed above. As for the water demand estimate for the proposed Master Plan presented in Impact 4.19-2, this wastewater estimate is also conservative as it does not necessarily account for compliance with the CSU Sustainability Policy related to water conservation, which would also serve to reduce wastewater generation from the campus. As such, impacts of the proposed Master Plan related to wastewater treatment capacity would be **less than significant.**

Project-Level Analysis for Near-Term Projects

The near-term projects under the proposed Master Plan would represent an increase in wastewater flows compared to existing conditions. However, as described above with the proposed Master Plan program elements, the local facilities have sufficient capacity for the full buildout and as a result would also have capacity for the near-term projects. Therefore, the impacts of the near-term projects related to wastewater treatment capacity would be **less than significant.**

Impact 4.19-4 The project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. (Less than Significant)

Program-Level Analysis for Master Plan

Construction Impacts

Construction activities would result in generation of solid waste that would likely include scrap lumber, concrete, residual wastes, packing materials, plastics, and soils. However, through recycling and reuse of construction/demolition materials, the campus diverts the vast majority of its construction/demolition waste from the landfill. Per CALGreen, at least 65% of all construction and demolition waste is required to be diverted from landfills. Any hazardous wastes that are generated during construction activities would be managed and disposed of in compliance with all applicable federal, state, and local laws. The remaining 35% of construction material that is not required to be recycled would either be disposed of or voluntarily recycled at a transfer station or solid waste facility with available capacity.

As previously described, the West Valley Materials Recovery Facility transfers solid waste to one of three landfills: Mid-Valley Sanitary, El Sobrante, or Badlands Sanitary. As of current reporting all three landfills have remaining capacities of 54,219,377, 121,083,583, and 4,900,000 cy, respectively (CalRecycle 2025a, CalRecycle 2025b, CalRecycle 2025c),

For the reasons stated above, proposed Master Plan construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals (e.g., CALGreen standards). Therefore, short-term construction impacts of the proposed Master Plan associated with solid waste disposal would be **less than significant**.

Operational Impacts

Once operational at full buildout of the proposed Master Plan, the Master Plan would produce solid waste on a regular basis in association with O&M activities. According to modeling estimates that were used as part of the air quality analysis in Section 4.3 Air Quality, Master Plan operation would result in the net increase in solid waste generation of approximately 2,672 tons per year (estimated 58,784 cy) at buildout of the proposed Master Plan. As previously discussed, the three landfills used by the West Valley Materials Recovery Facility transfer station have a combined capacity of 180,202,960 cy, which is sufficient to accommodate the increased solid waste generated from the proposed Master Plan.

In addition, solid waste generated from operation of the proposed Master Plan would be subject to the existing on-campus solid waste diversion program, which historically has been successful at diverting at least 50% of on-campus generated solid waste from a landfill to an appropriate recycling facility. Maintaining the existing diversion rate would ensure compliance with AB 75, which requires all large state facilities to divert at least 50% of solid waste from landfills. However, compliance with the CSU Sustainability Policy would result in increased diversion beyond 50% through 2040, as campuses are required to seek to reduce the rate of landfill bound waste to 50% of total campus waste by 2030, divert at least 80% by 2040, and move toward zero waste. Additionally, consistent with the campus's ongoing recycling programs, all recyclable materials generated because of Master Plan operation, would continue to be sent to the Mission Recycling Facility in Pomona. This facility is a for-profit entity that can meet the demands of an increased recyclable waste supply from Cal Poly Pomona (Cal Poly Pomona 2022). For the

reasons described above, Master Plan operation would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals and impacts associated with solid waste disposal would be **less than significant**.

Project-Level Analysis for Near-Term Projects

The near-term projects under the proposed Master Plan would represent an increase in generated solid waste compared to existing conditions. As the near-term projects involve renovations and construction activities, there would be both construction and operational solid waste produced. However, as described above with the proposed Master Plan program elements, the combination of required diversions (e.g., CALGreen standards, AB 75 standards, CSU Sustainability Policy standards, and campus standards) and existing capacities of the landfills currently accessed, the near-term projects would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals and impacts associated with solid waste disposal would be **less than significant.**

Impact 4.19-5 The project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. (Less than Significant)

Program-Level Analysis for Master Plan

As described in Impact 4.19-4, solid waste collected from the Cal Poly Pomona is directed to the West Valley Materials Recovery Facility, where waste is sorted for recyclable materials and non-recyclable materials are then taken to Mid-Valley Sanitary, El Sobrante, or Badlands Sanitary landfills. These facilities are regulated under federal, state, and local laws. Additionally, Cal Poly Pomona is required to comply with the solid waste reduction and diversion requirements set forth in various state bill requirements (e.g., AB 939, AB 75, AB 341, AB 32, and AB 1826).

In addition, as described in Impact 4.19-4, waste diversion and reduction during proposed Master Plan construction and operation would be completed in accordance with CALGreen standards, AB 75 standards, CSU Sustainability Policy standards, and Cal Poly Pomona diversion standards. As a result, the proposed Master Plan would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, impacts of the proposed Master Plan associated with compliance with solid waste statutes and regulations would be **less than significant**.

Project-Level Analysis for Near-Term Projects

The near-term projects under the proposed Master Plan would similarly be subject to all applicable waste diversion and reduction requirements as set forth in the existing regulatory requirements. As a result, the near-term projects would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, impacts of the near-term projects associated with compliance with solid waste statutes and regulations would be **less than significant**.

4.19.4.2 Cumulative Impacts

Impact 4.19-6 The project would not result in a cumulatively considerable contribution to significant cumulative impacts related to utilities and service systems. (Less than Significant)

Water

The proposed Master Plan, along with other cumulative projects occurring in the area, would be required to comply with applicable federal, state, and local water regulations. In addition, cumulative projects that access the Spadra Basin would be subject to the planning efforts of the Spadra Basin GSP. As previously mentioned, Cal Poly Pomona owns, operates and maintains an independent potable water system but does also supplement with imported water. According to the WSE prepared for the proposed Master Plan (Appendix G), which considers water demands and supplies on a cumulative basis, it is likely the Master Plan would have sufficient water available from the Basin during normal, single dry, and multiple dry years over a 20-year projection. With the increase in water demand, which encompasses a small percentage of the water capacity of the Spadra Basin, the proposed Master Plan does not include any components or activities that would contribute to cumulative water impacts and thus, cumulative impacts regarding water supplies would be **less than significant**.

Wastewater

The proposed Master Plan, along with other cumulative projects occurring in the area, would be required to comply with applicable federal, state, and local regulations applicable to the construction of any new or expanded wastewater facilities. As previously mentioned, wastewater generated by the proposed Master Plan as well as the cumulative projects would be treated at the A.K. Warren Water Resource Facility (formerly Joint Water Pollution Control Plant) located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 246.0 mgd, or the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average recycled flow of 62.6 mgd. Therefore, there is sufficient capacities at the regional wastewater treatment facilities and the proposed Master Plan does not include any components or activities that would contribute to cumulative wastewater or wastewater treatment impacts and thus, cumulative impacts regarding wastewater would be **less than significant**.

Stormwater

Similar to the proposed Master Plan, cumulative projects in the region would be required to implement BMPs to control pollutants and site runoff including requirements to ensure that changes in drainage patterns do not result in any increases in post-development runoff volumes. Examples include evaluation of site soils and flow path; implementing structural BMPs such as bioretention areas; and hydromodification standards requiring projects to demonstrate that post-project runoff would not exceed pre-project flow rate. As previously discussed, the proposed Master Plan as well as cumulative projects would adhere to these existing regulatory requirements which are based on region wide infrastructure, and other required measures to address stormwater site runoff, and thus would not contribute to a cumulative impact related to the construction of new storm water drainage facilities or the expansion of existing facilities. Therefore, the proposed Master Plan would not substantially affect stormwater drainage facilities and cumulative impacts would be **less than significant**.

Energy

Refer to the discussion of cumulative energy impacts in Section 4.7, Energy. The proposed Master Plan would not result in wasteful, inefficient, or unnecessary use of energy, in large part due to the short-term and temporary nature of the construction period. Additionally, the operational activity of the proposed Master Plan would be minimized through energy reduction strategies pursuant to Title 24. All other cumulative projects are required to comply with Title 24, and therefore, the long-term energy consumption of those projects would also be reduced. Therefore, the cumulative impacts of the proposed Master Plan related to energy use would be **less than significant**.

Solid Waste

The proposed Master Plan, along with other cumulative projects occurring in the area, would be required to comply with applicable federal, state, and local solid waste regulations (e.g., (e.g., AB 939, AB 75, AB 341, AB 32, and AB 1826). Given the existing capacities of the Mid-Valley Sanitary, El Sobrante, and Badlands Sanitary landfills, as described above (CalRecycle 2025a, CalRecycle 2025b, and CalRecycle 2025c), it is not expected that new or expanded landfills would be needed to accommodate regional solid waste disposal needs.

The proposed Master Plan would generate additional solid waste during construction and operation. However, the campus diverts the vast majority of construction and demolition waste and has a successful waste diversion program through the current hauler. As such, the proposed Master Plan would not result in a cumulatively considerable contribution to solid waste and landfill impacts. Thus, cumulative impacts would be **less than significant**.

4.19.5 Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

4.19.6 Level of Significance After Mitigation

All impacts would be less than significant without mitigation.

4.19.7 References

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5 Other CEQA Considerations

5.1 Introduction

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation (Cal. Code Regs. tit. 14, Section 15126). As part of this analysis, the Environmental Impact Report (EIR) must identify the following types of impacts:

- Significant environmental effects which cannot be avoided if the proposed Master Plan is implemented;
- Significant irreversible environmental effects which would be caused by the proposed Master Plan should it be implemented; and
- Growth-inducing impacts of the proposed Master Plan.

The following sections identify each of these types of impacts based on analyses contained in Chapter 4.

5.2 Significant and Unavoidable Impacts

This section identifies significant impacts that could not be eliminated or reduced to less than significant through the implementation of mitigation measures imposed by California State Polytechnic University Pomona (Cal Poly Pomona). The final determination of significance of impacts and of the feasibility of mitigation measures will be made by the California State University Board of Trustees as part of its certification action for the EIR. Chapter 1, Executive Summary, of this EIR contains a summary of the environmental impacts and mitigation measures. Chapter 4, Environmental Analysis, provides a comprehensive identification of the Campus Master Plan Update's ("proposed Master Plan") environmental effects, including the level of significance both before and after mitigation.

Most of the potentially significant impacts identified in this EIR can be reduced to less than significant through incorporation of mitigation measures identified in Chapter 4. The proposed Master Plan, however, would have a significant unavoidable impact related to a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. Implementation of the proposed Master Plan would adversely affect the Mid-Century Modern Campus Core Historic District, through the demolition of contributing resources, major renovation/rehabilitation of contributing resources, and new in-fill construction within the historic district. Implementation of the proposed Master Plan would adversely affect the College of Environmental Design (Building 7), through alterations to character-defining features and a potential loss of historic integrity. Implementation of the proposed Master Plan could adversely affect the Library (Building 15), through physical changes and alterations to character-defining features and a potential loss of historic integrity. Lastly, implementation of the proposed Master Plan would adversely affect the Arabian Horse Center Historic District, through physical changes and alterations to character-defining features and a potential loss of historic integrity. Mitigation measures MM-HBE-1 through MM-HBE-5 would lessen and avoid some significant adverse impacts to historical resources. Following mitigation, impacts would still be significant unavoidable. See Impact 4.6-1 in Section 4.6, Cultural Resources - Historical Resources, and Appendix D-2 for additional details.

5.3 Significant and Irreversible Environmental Effects

The CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by a proposed project (Cal. Code Regs. tit. 14, § 15126.2(d)), as follows:

> Uses 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.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses.
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).
- The project would involve a large commitment of nonrenewable resources.
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project.

Development under the proposed Master Plan would result in the continued commitment of the Cal Poly Pomona campus to institutional uses, thereby precluding any other uses for the lifespan of the campus. The California State University System's ownership of the campus represents a long-term commitment of the campus lands to an institutional use. Restoration of the campus to pre-developed conditions is not feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment.

Resources that would be permanently and continually consumed by proposed Master Plan implementation include water, electricity, natural gas, and fossil fuels; however, the consumption of these resources would not represent unnecessary, inefficient, or wasteful use of resources, as documented in Section 4.7, Energy, and Section 4.19, Utilities and Service Systems. The growth in student enrollment, and the associated growth in the campus population, is in response to growth that has already occurred in the state. Therefore, natural resources are currently being consumed by this demographic group and would continue to be consumed by this group throughout California. Nonetheless, construction activities related to the project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil, natural gas, and gasoline) for automobiles and construction equipment.

The proposed Master Plan would comply with the CSU Sustainability Policy related to water conservation. This policy requires all CSU campuses to pursue water resource conservation to reduce water consumption by 10% by 2030 consistent by AB 1668, including such steps to develop sustainable landscaping, reduce turf, install controls to optimize irrigation water use, reduce water usage in restrooms and showers, and promote the use of reclaimed/recycled water (CSU 2024).

The proposed Master Plan would comply with all applicable regulatory requirements including Title 24 of the California Code of Regulations which contains energy efficiency standards for residential and nonresidential buildings based on a state mandate to reduce California's energy demand. Specifically, Title 24 addresses a

number of energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope such as windows, doors, wall/floor/ceiling assemblies, and roofs. Part 6 of Title 24 specifically establishes energy efficiency standards for residential and nonresidential buildings constructed in the State of California designed to reduce energy demand and consumption. Part 11 of Title 24 also includes the CALGreen building standards, which established mandatory minimum environmental performance standards for new construction projects. The proposed Master Plan would comply with Title 24, Part 6 and Part 11, per state regulations. Further, as described in Section 4.7-1, Energy, Cal Poly Pomona would comply with the CSU Sustainability Policy, which would reduce energy use.

With respect to operational activities on campus, compliance with all applicable building codes, the CSU Sustainability Policy, and project objectives would ensure that natural resources, including water, are conserved to the maximum extent feasible. It is also possible that new technologies or systems will emerge, or will become more cost-effective, to further reduce the campus's reliance upon nonrenewable energy resources. Overall, the consumption of natural resources would increase at a lesser rate than the projected population increase due to the variety of energy and water conservation measures that the campus has implemented and will continue to implement.

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the project. While the campus uses, transports, stores, and disposes of hazardous wastes, as described in Section 4.10, Hazards and Hazardous Materials, the campus complies with all applicable state and federal laws and existing campus programs, practices, and procedures related to hazardous materials, which reduces the likelihood and severity of accidents that could result in irreversible environmental damage. Additionally, Section 4.10, Hazards and Hazardous Materials, identifies a mitigation measure that will reduce construction impacts associated with potential releases from current or former underground storage tanks on campus. Therefore, the potential for the proposed Master Plan to cause irreversible environmental damage from an accident or upset of hazardous materials is very low.

5.4 Growth Inducing Impacts

As required by the CEQA Guidelines, an EIR must discuss ways in which a potential project could induce growth. This discussion should include consideration of ways in which the project could directly or indirectly foster economic or population growth in adjacent and/or surrounding areas. The removal of obstacles to population growth (such as removal of infrastructure limitations or regulatory constraints) must also be considered in this discussion. According to CEQA Guidelines Section 15126.2(e), "it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment" (Cal. Code Regs. tit. 14, Section 15126.2(e).

According to the CEQA Guidelines, a project would have the potential to induce growth if it would:

- Remove obstacles to population growth (e.g., through the expansion of public services into an area that does not currently receive these services), or through the provision of new access to an area, or a change in restrictive zoning or land use designation; or
- Result in economic expansion and population growth through employment opportunities and/or construction of new housing.

The proposed Master Plan would directly increase the study area population by providing facilities such that campus student population and employment would increase. The proposed Master Plan would also indirectly increase

employment and population in the region through the expenditures made by the campus and by students, faculty, and staff. These aspects of growth inducement are further discussed below.

5.4.1. Direct Population and Employment Growth

The information provided in this section is based on the analysis of direct population and employment growth provided in Section 4.14, Population and Housing. As discussed in Section 4.14, direct population growth related to the proposed Master Plan could result from development of academic and student support services, student housing, and other campus uses that would allow Cal Poly Pomona to increase its student enrollment. An increase in student enrollment would also result in an increase in faculty, staff, and their families. Construction of 1,040 beds for student housing would increase the number of residents living on the campus.

Overall, the project would result in a net increase in campus population headcount of approximately 8,085 students, and 879 staff and faculty (see Section 4.14, Population and Housing). This net population growth is conservatively assumed to be new to the study area (i.e., would relocate into Los Angeles County from other areas) even though many new Cal Poly Pomona students and staff would already live in Los Angeles County at the time of their enrollment or employment at Cal Poly Pomona. While the proposed Master Plan would induce growth through the construction of new on-campus housing and increased employment, the growth anticipated in the proposed Master Plan is not considered substantial unplanned population growth, as indicated in Section 4.14.

5.4.2 Indirect Employment Growth

In addition to the direct population changes described above, additional changes in regional population would result as campus-serving businesses or other businesses move into the area or expand in response to the increased demand for goods and services. Therefore, apart from the direct jobs on the campus, the operation of the campus under the proposed Master Plan would result in the creation of new indirect and induced jobs. Indirect jobs are those that are created or supported when the campus purchases goods and services from businesses in the region. Induced jobs are created or supported when wage incomes of those employed in direct and indirect jobs or students are spent on the purchase of goods and services in the region. These indirect and induced jobs are likely accounted for in SCAG's RTP/SCS Growth Forecast Report, which indicate that 430,000 jobs will be added to the Los Angeles region between 2019 and 2050 (SCAG 2024). It would be expected that most of these indirect and induced jobs would be created in the food, entertainment, and service sectors within the study area. It would also be expected that the campus-related indirect and induced employment growth would result in some commercial development on lands that are underutilized and that are near the campus.

5.4.3 Indirect Population Growth

The indirect and induced employment that would result from the implementation of the proposed Master Plan, described in Section 5.4.2, Indirect Employment Growth, could result in additional population growth if individuals move into the study area to fill these jobs. It is anticipated that some employees that are currently commuting would stop commuting and would take up the new indirect and induced locally available jobs related to campus growth. However, the vast majority of the anticipated indirect and induced jobs would be in the retail and services sectors and would not require special skills, and therefore could be filled by students or by dependents/spouses of persons who move to the area to fill jobs on the campus. Therefore, the indirect and induced jobs generated by the proposed Master Plan would not be expected to result in substantial population growth in the region.

5.4.4 Other Indirect Growth

As indicated previously, growth can potentially be induced through the removal of obstacles to population growth (e.g., through the expansion of public services into an area that does not currently receive these services), or through the provision of new access to an area, or a change in restrictive zoning or land use designation. As indicated in Section 4.14, Population and Housing, development under the proposed Master Plan would consist of infill development and renovation of buildings to accommodate the proposed enrollment increase and related population growth. No new external roads would be constructed as part of the proposed Master Plan. Internal circulation improvements are proposed within roads of the campus to enhance campus identity, entry, and wayfinding, to improve safety for all modes of travel, and to improve transit and shuttle access for the campus. All utility connections and improvements would be sized to accommodate proposed buildings and projected campus population growth (see Section 4.19, Utilities and Service Systems). Additionally, the proposed Master Plan does not propose development in areas outside of the main campus. As such, the proposed Master Plan would not result in indirect growth inducement through the removal of obstacles to growth.

5.5 References

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6 Alternatives

6.1 Introduction

This chapter describes alternatives to the proposed California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan Update ("project" or "proposed Master Plan"), consistent with California Environmental Quality Act (CEQA) Guidelines Section 15126.6. This chapter presents a summary of its significant environmental impacts, the objectives of the proposed project, and a description of the alternatives that were considered but eliminated from further consideration, followed by an analysis of the alternatives evaluated, including the No Project Alternative. A comparison of alternatives to the proposed project is provided and the environmentally superior alternative is identified.

According to CEQA Guidelines Section 15126.6, an environmental impact report (EIR) shall describe a range of reasonable alternatives to the project or to the location of the project that would feasibly attain most of the basic objectives of the project and could avoid or substantially lessen any of the significant effects of the project, and shall evaluate the comparative merits of the alternatives. Section 15126.6 further requires that the discussion focus on alternatives capable of eliminating significant adverse impacts of the project or reducing them to a level of insignificance even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. The alternatives analysis also should identify any significant effects that may result from a given alternative.

The lead agency is responsible for selecting a reasonable range of potentially feasible project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. The range of alternatives is governed by a "rule of reason" that requires the EIR to set forth only those potentially feasible alternatives necessary to permit a reasoned choice. The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of the project (see Section 6.1.1, Significant Impacts). Of those alternatives, the EIR need examine in detail only those that the lead agency determines could feasibly attain most of the basic objectives of the project (see Section 6.1.2, Project Objectives) while substantially lessening any of the significant effects of the project. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation.

An EIR is not required to consider alternatives which are infeasible. "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (CEQA Guidelines Section 15364). Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or already owns the alternative site). None of these factors establishes a fixed limit on the scope of reasonable alternatives. Under CEQA case law, the concept of feasibility also "encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (*City of Del Mar v. City of San Diego* [1982] 133 Cal.App.3d 410, 417; *California Native Plant Society v. City of Santa Cruz* [2009] 177 Cal.App.4th 957.) In assessing the feasibility of alternatives, agency decision-makers may also take account of the extent to which the alternatives meet or further the agency's fundamental purpose or objectives in considering a proposed project. (*Sierra Club v. County of Napa* [2004] 121 Cal.App.4th 1490, 1506-1509; *Citizens*

for Open Government v. City of Lodi [2012] 296 Cal.App.4th 296, 314-315; *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* [2008] 43 Cal.4th 1143, 1165, 1166; *Yerba Buena Neighborhood Consortium, LLC v. Regents of University of California* (2023) 95 Cal.App.5th 779, 795-799.

To provide the basis for the alternatives analysis contained in this Chapter, this subsection provides an overview of the significant impacts of the proposed Master Plan, describes the project objectives, and lays out the process for developing alternatives.

6.1.1 Overview of Significant Impacts

The range of alternatives studied in the EIR must be broad enough to permit a reasoned choice by decision-makers when considering the merits of the project. The analysis should focus on alternatives that are feasible. Under CEQA, alternatives that are remote or speculative should not be discussed in the analysis of alternatives. Furthermore, alternatives must avoid or substantially lessen any of the significant environmental impacts associated with the proposed project (CEQA Guidelines 15126.6[a]). Chapter 1, Executive Summary, presents a detailed summary of the environmental impacts associated with implementation of the proposed Master Plan (see Table 1-1). Campus growth under the proposed Master Plan would result in the following potentially significant impacts:

- **Impact 4.1-2.** The project could create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.
- **Impact 4.4-1.** The project could have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- **Impact 4.4-2.** The project could have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- **Impact 4.4-3.** The project could have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- **Impact 4.4-4.** The project could interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- **Impact 4.5-1.** The project could cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
- **Impact 4.5-2.** The project could disturb any human remains, including those interred outside of dedicated cemeteries.
- **Impact 4.6-1.** The project could substantial adverse change in the significance of a historical resource pursuant to §15064.5.
- **Impact 4.8-4.** The project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- **Impact 4.10-2.** The project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the

environment, including due to the project being located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

- **Impact 4.10-3.** The project could emit hazardous emissions or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- **Impact 4.10-6.** The project could (1) expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, or (2) exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, due to slope, prevailing winds, and other factors.
- **Impact 4.13-1.** The project could result in generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; however, the project would not result in a substantial permanent increase in ambient noise levels.
- **Impact 4.18-1.** The project could cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or as determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1.

Most of the potentially significant impacts listed above can be reduced to less than significant through incorporation of mitigation measures identified in Chapter 4, Environmental Setting, Impacts, and Mitigation Measures. However, the proposed Master Plan would have a **significant unavoidable** impact on eligible historic resources**.** The impact analysis concluded that the proposed Master Plan would have a significant impact on the Mid-Century Modern Campus Core Historic District, the Library (Building 15), the College of Environmental Design (Building 7), and the Arabian Horse Center Historic District. While feasible mitigation measures are available to reduce these impacts, such mitigations would not avoid the impact and it would remain significant unavoidable (see Section 4.6, Cultural Resources - Historical Resources, for details).

6.1.2 Project Objectives

The underlying purpose of the proposed Master Plan project is to guide campus development in a manner that supports Cal Poly Pomona's 2017-2025 Strategic Vision and enrollment of approximately 30,000 FTES and accompanying faculty and staff growth, while preserving and enhancing the campus environment and quality of life. As such, as described in Chapter 3, Project Description, the following project objectives are based on the goals and organizing principles of the proposed Master Plan, and support the underlying purpose of the project:

1. Support and advance Cal Poly Pomona's educational mission, as defined by the California Education Code, by guiding the physical development of the campus to accommodate enrollment growth to approximately 30,000 FTES and expanding the number of faculty and staff to support such enrollment growth, subject to funding.
2. Renovate or demolish buildings that are inefficient in terms of operation, maintenance, and user comfort due to age and critical deferred maintenance.
3. Replace demolished and temporary buildings with higher-density, mixed-use buildings that consolidate and integrate colleges and student support services.

4. Strengthen campus residential life by constructing new or replacement buildings to:
   - Increase student housing capacity by approximately 1,040 net new beds to enhance student experience, support, wellness, success, and retention.
   - Include a more diverse mix of housing types for students (freshman dormitories, pod configurations, suites, and apartments).
   - Provide high-quality and affordable student housing options.
   - Include common spaces, active outdoor spaces, and space for student support services within student housing.
5. Preserve space in the campus core for academic uses and programming and for student-focused services.
6. Provide I-Poly High School students additional space to accommodate recreational activities, subject to the Los Angeles County Office of Education securing grant funds.
7. Provide mobility enhancements for safe, sustainable, and accessible circulation within and around the campus for pedestrians and bicyclists, to reduce reliance on vehicles and provide students, faculty/staff, and visitors with safe and easy access to public transit as an alternative to bringing a car to campus.
8. Provide high-quality athletic facilities and optimize existing recreational fields by utilizing land area and improving connections to and through the sports facilities.
9. Update infrastructure to provide safe and reliable utilities to the campus community.
10. Reduce reliance on fossil fuel consumption by expanding campus renewable energy production and by constructing and renovating buildings to meet Leadership in Energy and Environmental Design (LEED) certification requirements.

6.1.3 Process for Developing Alternatives

To meet the project objectives, several alternatives to the proposed Master Plan have been considered, including alternate designs and reducing the amount of development proposed. Additionally, Section 15126.6(f)(2) of the CEQA Guidelines requires that an EIR consider alternative locations to the project site. Several alternative locations have been considered, including development outside of the main campus.

The range of alternatives has been refined through the Master Planning process and EIR development to determine those alternatives that could be eliminated from further consideration and those alternatives that would be carried forward for detailed analysis in this EIR. A discussion of the alternatives that were considered but ultimately dismissed and the reasons for their elimination are provided in Section 6.2, Alternatives Considered and Rejected. Section 6.3, Alternatives Selected for Further Analysis, provides the alternatives that have been carried forward for detailed analysis.

6.2 Alternatives Considered and Rejected

This section discusses alternatives that were considered during proposed Master Plan development or during the preparation of this Draft EIR but were eliminated from detailed consideration because they did not meet most of the basic project objectives; were found to be infeasible for technical, environmental, or social reasons; or they did not avoid or substantially lessen significant environmental impacts of the proposed project. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible, and briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed

consideration in an EIR are: (1) failure to meet most of the project objectives, (2) infeasibility, or (3) inability to avoid significant environmental impacts (see Section 6.1, Introduction).

6.2.1 Reduced Enrollment

Under this alternative, Cal Poly Pomona would limit student enrollment on campus resulting in a reduced need for development. Depending on the limit of enrollment and development, this could result in reduced impacts in various issue areas. However, Cal Poly Pomona does not control enrollment levels. Master Plans are based on annual academic year enrollment projections, and consultations with the State of California to anticipate systemwide enrollment growth and associated funding in accordance with the CSU's educational mission according to California's Education Code (see Chapter 3, Project Description [Section 3.5]). This alternative was dismissed from further consideration, as it would not allow Cal Poly Pomona to meet its state/constitutional educational obligations to accommodate high school seniors and would not meet the underlying purpose and the basic project objectives. Therefore, this alternative is not feasible and is not considered in further detail.

6.2.2 Remote/Distance Learning Alternative

Under this potential alternative, Cal Poly Pomona would serve all future enrollment growth through expanded online course curricula. This would reduce the need for on-campus facilities, although certain academic programs (e.g., those that involve scientific laboratory or agricultural field coursework) and tenure track faculty would still require on-campus building space. Additional student housing would not be constructed. With respect to on-campus employment, some new faculty/staff would be needed to support a distance learning program. This alternative is not consistent with the current academic programming needs of Cal Poly Pomona or the CSU.

This alternative would not fulfill most of the basic project objectives, including providing for the physical development of the campus to accommodate enrollment growth to 30,000 FTES, and strengthening campus residential life. Further, the feasibility of further expanding remote/distance learning in terms of total enrollment is not considered feasible beyond that currently provided. Therefore, this alternative is not feasible and is not considered in further detail.

6.2.3 Alternative Locations

Cal Poly Pomona, like most university campuses, is long-established in its present location and represents a traditional campus typology, with educational instruction offered, for the most part, in a single geographic location. Cal Poly Pomona is primarily an undergraduate institution with a critical mass of students and faculty and a diversity of course offerings designed to satisfy regional demand.

Alternative locations beyond the Cal Poly Pomona main campus were not considered in detail during the master planning process for a number of reasons. Several of the primary objectives of the proposed Master Plan seek to renovate or demolish main campus buildings that are inefficient in terms of operation, maintenance, and user comfort due to age and critical deferred maintenance (Objective 2); replace main campus buildings proposed to be demolished with higher density, mixed-use buildings that consolidate and integrate colleges and student support services (Objective 3); and to strengthen main campus residential life by constructing new or replacement buildings to increase student housing and related student spaces and support services (Objective 4). Development in alternative locations would also increase reliance on vehicles for students to travel between the main campus and these locations, which conflicts with Objective 7. In addition to not meeting project objectives, development in

alternative locations may potentially require additional campus resources such as police personnel, or result in an increase in construction costs due to the availability or non-availability of existing utilities at the sites. Thus, the improvements under the proposed Master Plan reflect the focus on renovation and replacement of existing facilities on the main campus to meet the underlying purpose of the proposed Master Plan.

Beyond the main campus, Cal Poly Pomona owns additional property south of W. Temple Avenue: the approximate 300-acre Lanterman Development Center (formerly the State of California Lanterman Center for the Developmentally Disabled); the 159-acre Spadra Farm; and additional agricultural land, which formerly operated as the Spadra Landfill. No new development is proposed for the Lanterman Development Center, Spadra Farm, or 164-acre Spadra Landfill (now closed) under the proposed Master Plan and they are not considered for alternative locations for the proposed Master Plan, as described below.

6.2.3.1 Lanterman Development Center

The use of this site for all or a portion of the proposed Master Plan was not considered appropriate and was eliminated from further consideration as such development at the Lanterman Development Center would not meet the primary objectives that seek to renovate or demolish main campus buildings that are inefficient; replace demolished main campus buildings to consolidate and integrate colleges and student support services; and strengthen main campus residential life.

6.2.3.2 Spadra Farm

As stated in Chapter 3, Project Description, the 159-acre Spadra Farm is located approximately one mile from campus and was a onetime agricultural portion of the Lanterman Development Center. The site hosts Cal Poly Pomona's teaching farm that is devoted to vegetable and fruit production as well as a home to numerous student and faculty research projects. The use of this site for all or a portion of the proposed Master Plan was not considered infeasible and was eliminated from further consideration given that the site is devoted Cal Poly Pomona's teaching farm, a dedicated use supporting Cal Poly Pomona's agricultural programs. Use of Spadra Farm for all or a portion of the proposed Master Plan would require relocation of the teaching farm to lands with similar characteristics, which would likely be at some distance from the campus. Further, such an alternative would: not address the primary objectives of the proposed Master Plan to: renovate or demolish main campus buildings that are inefficient in terms of operation, maintenance, and user comfort due to age and critical deferred maintenance; to replace demolished and temporary main campus buildings with higher-density, mixed-use buildings that consolidate and integrate colleges and student support services; and to strengthen main campus residential life.

6.2.2.3 Spadra Landfill

As stated in Chapter 3, Project Description, Spadra Landfill served the eastern San Gabriel Valley from 1957-2000 and is now closed. The 164-acre Spadra Landfill also encompasses the 16-acre dedicated location of the John T. Lyle Center for Regenerative Studies at Cal Poly Pomona, a living laboratory for education, research, demonstration, and outreach, focusing on climate change. The site contains several buildings that use alternative design and construction techniques, facilities that support water management and solar photovoltaic cells, and grounds that support Hügelkultur (soil building technique), permaculture, woodlands and wildlife habitat, constructed wetlands, regenerative agriculture, and composting. The use of this site for a portion of the proposed Master Plan was eliminated from further consideration given the presence of the John T. Lyle Center for Regenerative Studies and the unsuitability of a landfill to support campus development.

6.3 Alternatives Selected for Further Analysis

This section describes the alternatives to the proposed Master Plan that were selected and analyzed according to CEQA Guidelines Section 15126.6(a) after elimination of some considered alternatives as explained in Section 6.2, Alternatives Considered but Eliminated. The analyzed alternatives, including the No Project Alternative, represent a range of reasonable alternatives to the proposed Master Plan that would feasibly attain at least some of the project's basic objectives, and would avoid or substantially lessen one or more of the significant adverse environmental effects of the proposed Master Plan, as listed in Section 6.1.1, Overview of Significant Impacts, and described in detail in Chapter 4, Environmental Setting, Impacts, and Mitigation Measures.

The following alternatives were selected for comparative analysis in this EIR:

- **Alternative 1:** No Project Alternative
- **Alternative 2:** Reduced Development/Historic Preservation Alternative
- **Alternative 3:** Reduced Development/Adaptive Reuse Alternative

The alternatives analysis is presented as a comparative analysis to the proposed Master Plan. The alternatives analysis assumes that all applicable mitigation measures (MM) recommended for the proposed Master Plan would also apply to potentially significant environmental impacts of each alternative, where relevant, except for Alternative 1, No Project Alternative. The following analysis compares the potentially significant environmental impacts of the three alternatives with those of the proposed Master Plan for the environmental topics analyzed in Chapter 4, Environmental Setting, Impacts, and Mitigation Measures. The alternatives are also reviewed for their ability to meet the project objectives provided in Section 6.1.2, Project Objectives. A summary of the alternatives analysis conclusions is provided in Section 6.5, Comparison of Alternatives, and shown in Tables 6-2 and 6-3.

6.3.1 Alternative 1: No Project Alternative

6.3.1.1 Description of Alternative 1

The purpose of describing and analyzing a No Project Alternative is to allow decision-makers to compare the impacts of approving the proposed Master Plan with the impacts of not approving the Master Plan (CEQA Guidelines Section 15126.6[e][1]). CEQA Guidelines Section 15126.6(e)(2) generally provides that "[t]he 'no project' analysis shall discuss the existing conditions at the time the notice of preparation is published, … as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." Section 15126(e)(3)(A) provides that, "when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the 'no project' alternative will be the continuation of the existing plan, policy or operation into the future… Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan."

With Alternative 1, No Project Alternative, the proposed Master Plan and enrollment increase to approximately 30,000 FTES would not be adopted, and the campus would continue to operate under the previously adopted 2000 Master Plan. This last comprehensive revision to the Master Plan for the Cal Poly Pomona campus was approved in 2000 and was intended to guide campus development through 2010. Since then, a number of minor and major Master Plan revisions have been approved by the Chancellor's Office. The 2000 Master Plan provided a framework for land use, development, open space, and circulation to accommodate projected enrollment of 20,000 FTES and

related faculty and staff population on the campus by 2010, the buildout horizon anticipated at the time. A number of 2000 Master Plan projects have been implemented as originally proposed. The campus currently has 22,847 FTES (Fall 2023) and is currently developed with approximately 5,894,025 gross square feet (GSF) in non-residential buildings. Student housing consists of 3,929 beds in multiple buildings.

Under this alternative, the proposed Master Plan would not be adopted and the proposed improvements to Cal Poly Pomona's facilities and individual development projects identified to accommodate the gradual student enrollment growth to approximately 30,000 FTES and overall campus population of 32,941 by 2040 would not be implemented. Specifically, proposed renovation of existing buildings (renovation), demolition and/or replacement of existing buildings in the same general physical location (replacement), minimal construction of new buildings on undeveloped sites at the core of the campus (new construction), and retention of most buildings in their existing locations and configurations (buildings to remain) specified under the proposed Master Plan would not occur under Alternative 1. Instead, Cal Poly Pomona would continue to operate in accordance with the 2000 Master Plan, under which some proposed improvements to campus facilities. Outside of projects that have already been approved but not yet constructed (see Chapter 3, Table 3-2), any new projects not specified in the 2000 Master Plan, such as building renovations to address the age and condition of existing facilities, are not anticipated under Alternative 1 and would require separate environmental review. Additionally, any new mitigation measures identified to avoid potentially significant impacts under the proposed Master Plan would not be implemented and mitigation applicable to development under the No Project Alternative would be limited to those measures already adopted in conjunction with the 2000 Campus Master Plan EIR.

Under the No Project Alternative, the improvements and facilities under the 2000 Master Plan that have not yet been constructed could be implemented as proposed under the existing plan (see Chapter 3, Project Description Figure 3-2). Improvements proposed under the 2000 Master Plan that have not yet been developed include the following:

- Facilities Management and Corp Yard (Building 88). A new Facilities Management and Corp Yard is proposed under the 2000 Master Plan in the northwestern part of the main campus near the existing Central Plant Chiller and Parking Lot J.
- Environmental Design Center (Building 93). A new Environmental Design Center is proposed under the 2000 Master Plan in the northwestern part of the main campus on University Drive between the existing Health Services Building and the existing Administration Building.
- New Parking Structure (Building 108). A new parking structure (Parking Structure III) is proposed under the 2000 Master Plan in the northwestern part of the main campus on University Drive and just south of the existing Central Plant Chiller and Parking Lot J.
- Visitor Information Booth (Building 133). A new Visitor Information Booth is proposed under the 2000 Master Plan at Information Village on South Campus Drive near Temple Avenue.
- Academic Building (Building 135). A new Academic Building is proposed under the 2000 Master Plan in the northern part of the main campus between Cypress Lane and Red Gum Lane where a parking lot currently exists.
- Physical Education Expansion (Building 152). A new Physical Education Expansion is proposed under the 2000 Master Plan in the southern part of the main campus as an addition to the Kellogg Gymnasium.
- Center for Animal Veterinary Science Education (Building 155). A new Center for Animal Veterinary Science Education is proposed under the 2000 Master Plan in the northwestern part of the main campus along East Campus Drive.

Based on the approved 2000 Master Plan, as amended through 2016, the new buildings above could potentially be implemented under Alternative 1, which would provide for reduced additional space compared to the proposed Master Plan. None of the above projects under the 2000 Master Plan are included in the proposed Master Plan being evaluated in this EIR. It is also assumed that no new on-campus housing would be built under Alternative 1 except for projects that have already been approved and would be constructed with or without the proposed Master Plan. Additionally, the proposed PDFs associated with the proposed Master Plan, identified in Chapter 3, Project Description, would not be implemented under this alternative.

6.3.1.2 Impact Analysis

Aesthetics

As discussed in Section 4.1, Aesthetics, impacts of the proposed Master Plan would be less than significant regarding scenic quality and conflicts with applicable state and CSU regulations and policies governing scenic quality. Construction activities associated with the buildout of Alternative 1 would result in temporary, short-term visual impacts that would not be present following completion of construction, the same as the proposed Master Plan. Upon buildout, Alternative 1 would result in visual changes in the northern part of main campus where the Environmental Design Center (Building 93) is proposed; the northwestern part of the main campus where the Facilities Management and Corp Yard (Building 88), Academic Building (Building 135), and new Parking Structure (Building 108) are proposed; the northeastern part of campus where the Center for Animal Veterinary Science Education (Building 155) is proposed; and the southern part of campus where the Physical Education Expansion (Building 152) and Visitor Information Booth (Building 133) are proposed. Alternative 1 would result in less overall visual changes to the campus compared to the proposed Master Plan, which not only includes a net increase of approximately 600,000 GSF of building space but also proposes renovations to most buildings within the campus core as well as numerous renovations elsewhere on campus. Under Alternative 1, visual changes would occur only in consolidated areas of the campus and the majority of the campus would be visually the same as current conditions. Additionally, projects under Alternative 1 would be designed and constructed in compliance the CSU schematic design review process. This would ensure that projects under Alternative 1 are visually compatible with existing development and appropriate in design and quality. Overall, impacts Alternative 1 to scenic quality would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

The proposed Master Plan would result in potentially significant light and glare impacts due to the use of construction lighting and introduction of reflective surfaces on new or renovated buildings. However, implementation of mitigation measures would ensure that construction lighting is arranged in a manner that would not directly shine on or produce glare affecting adjacent motorists and residential uses, and that building structures would not contain large expanses of reflective surfaces, thereby reducing light and glare impacts to less than significant. Development under Alternative 1 includes several new buildings which are assumed in the 2000 Master Plan EIR to include lighting that is shielded and focused away from surrounding uses and therefore would not require mitigation. Additionally, parking would be provided within the new Parking Structure (Building 108) which would eliminate the need for extensive lighting associated with surface parking. Alternative 1 does not propose any new buildings or renovations that would otherwise result in significant light or glare impacts. Thus, impacts of Alternative 1 would be less than significant and reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Agriculture and Forestry

As discussed in Section 4.2, Agriculture and Forestry Resources, all projects under the proposed Master Plan would occur in areas absent important agriculture or forestry resources, and no conversion of land to non-agriculture uses would occur. However, Alternative 1 includes a new Center for Animal Veterinary Science Education (Building 155) in the northwestern part of the main campus along East Campus Drive which is designated as Farmland of Statewide Importance (see Section 4.2, Figure 4.2-1). The 2000 Master Plan EIR determined that the impact of converting farmland to urban uses would be significant and unavoidable, and no feasible mitigation measures were identified. Thus, impacts of Alternative 1 would be more severe compared to the proposed Master Plan (*significant unavoidable; greater impact*).

Air Quality

As discussed in Section 4.3, Air Quality, impacts of the proposed Master Plan would be less than significant regarding conflicts with the applicable air quality plan, increase of criteria pollutants, exposure of sensitive receptors to substantial pollutant concentrations, or other emissions such as those leading to odors. Compared to the proposed Master Plan, development of Alternative 1 would result in less new building space and would avoid emissions associated with the proposed Master Plan's renovation projects. This would result in fewer air pollutant emissions during construction and operation and accordingly, air quality impacts under Alternative 1 would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Biological Resources

As discussed in Section 4.4, Biological Resources, the proposed Master Plan could potentially result in significant adverse effects to several special-status plant and wildlife species, to bird species protected by the California Fish and Game Code and by the federal Migratory Bird Treaty Act (MBTA), to sensitive habitat, and to jurisdictional aquatic resources. Implementation of mitigation measures would reduce potentially significant impacts to these species to less than significant.

The proposed Master Plan largely focuses new development and renovations in portions of the campus which are already developed. In contrast, Alternative 1 would include new development in areas that have greater potential for impacts to protected species and sensitive biological resources mapped in Section 4.4, Figure 4.4-2. Under Alternative 1, the new Facilities Management and Corp Yard (Building 88) and Environmental Design Center (Building 93) are proposed in an area that is designated as critical habitat for Coastal California gnatcatcher. The Environmental Design Center is also proposed within the boundaries of the Voorhis Ecological Reserve. Additionally, the Center for Animal Veterinary Science Education (Building 155) is proposed in an undeveloped agricultural field within the *Hirschfeldia incana* association. Therefore, although Alternative 1 would result in less overall new development within the campus compared to the proposed Master Plan, new development would be in areas that are more biologically sensitive and impacts would be more severe than the proposed Master Plan. Additionally, mitigation measures provided in the 2000 Master Plan EIR focus only on Coastal California gnatcatcher and California black walnut, a sensitive vegetation community. Projects that occur on campus would be required to adhere to the Migratory Bird Treaty Act and California Fish and Game Code (CFGC) Sections 3500-3516 that prohibit take of all birds and their active nests including raptors and other migratory nongame birds. However, no mitigation measures for special-status plants, Crotche's bumble bee, special-status mammals and reptiles, special-status bats, other sensitive habitat, and jurisdictional aquatic resources (i.e., MM-BIO-1(1), MM-BIO-1(3), MM-BIO-1(5), MM-BIO-1(6), MM-BIO-2, MM-BIO-4, MM-BIO-5, MM-BIO-6, MM-BIO-7, and MM-BIO-8 under the proposed Master Plan) would be implemented under Alternative 1. Thus, impacts under Alternative 1 could be potentially significant

related to special-status plant and wildlife species, sensitive habitat, and jurisdictional aquatic resources *(potentially significant; greater impact).*

Cultural Resources

Archaeological Resources

As discussed in Section 4.5, Cultural Resources – Archaeological Resources, there is moderate potential for the inadvertent discovery of subsurface archaeological resources if ground disturbance occurs in native soils. Additionally, there is also the possibility of encountering human remains during construction activities. Implementation of mitigation measures would reduce these proposed Master Plan impacts to less than significant.

Under Alternative 1, there would be less ground disturbance required to build the remaining projects under the 2000 Master Plan compared to development under the proposed Master Plan and therefore less potential for inadvertent discovery of archaeological resources and human remains. However, no mitigation measures for inadvertent discovery of archaeological resources and human remains (i.e., MM-CUL-1, MM-CUL-2, MM-CUL-3, and MM-CUL-4 under the proposed Master Plan) would be implemented under Alternative 1. Therefore, impacts under Alternative 1 could be potentially significant related to the inadvertent discovery of archaeological resources and human remains (*potentially significant; greater impact*).

Historic Resources

As discussed in Section 4.6, Cultural Resources – Historic Resources, the proposed Master Plan would result in a significant unavoidable impact from demolition of historic buildings and/or historic district contributors even after implementation of mitigation measures. Alternative 1 does not include any projects that would affect the historic buildings and historic district contributors listed in Table 6-1 nor would there be any components that would otherwise impact historic resources. Therefore, Alternative 1 would avoid the significant unavoidable impact of the proposed Master Plan and impacts would be reduced overall compared to the proposed Master Plan (*less than significant; lesser impact*).

Energy

As discussed in Section 4.7, Energy, impacts of the proposed Master Plan would be less than significant regarding consumption of energy resources and conflict with energy plans. Given that Alternative 1 would result in less construction, housing, and new building space than the proposed Master Plan, there would be less energy resources consumed during construction and operation of Alternative 1. Therefore, energy impacts would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Geology and Paleontology

As discussed in Section 4.8, Geology and Paleontology, impacts of the proposed Master Plan would be less than significant regarding geology and soils. However, impacts of the proposed Master Plan would be potentially significant regarding paleontological resources due to the campus' high paleontological sensitivity. Implementation of a mitigation measure would reduce this impact to less than significant.

Under Alternative 1, geologic risks such as rupture of faults, groundshaking, liquefaction, and landslides would remain the same as the proposed Master Plan because those risks are dependent on physical conditions in the project area. However, impacts related to soil erosion would be reduced compared to the proposed Master Plan

due to less ground disturbance required to build the remaining projects under the 2000 Master Plan. While development under Alternative 1 would involve less ground disturbance, no mitigation measures for damage to paleontological resources (i.e., MM-GEO-1 under the proposed Master Plan) would be implemented under Alternative 1. Therefore, impacts under Alternative 1 could be potentially significant related to the paleontological resources (*potentially significant; greater impact*).

Greenhouse Gas Emissions

As discussed in Section 4.9, Greenhouse Gas Emissions, the proposed Master Plan would not result in greenhouse gas emissions that would exceed the campus-specific mass emissions threshold, nor would the proposed Master Plan conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases and therefore impacts would be less than significant. Given that Alternative 1 would result in less new building space than the proposed Master Plan and less construction overall, there would be less greenhouse gas emissions during construction and operation of Alternative 1. Therefore, greenhouse gas emissions impacts would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Hazards and Hazardous Materials

As discussed in Section 4.10, Hazards and Hazardous Materials, a Cortese List database search revealed documentation of a closed leaking underground storage tank (LUST) case and a list of 21 operational underground storage tanks (USTs) present throughout the main campus. The exact location of the LUST and USTs are unknown; therefore, there is potential for proposed Master Plan construction activities to result in release of petroleum products to the environment, a potentially significant impact requiring a mitigation measure to reduce the impact to less than significant. Alternative 1 would require less ground disturbance and therefore less potential to encounter USTs; however, no mitigation measures for the potential release of petroleum products (i.e., MM-HAZ-1 under the proposed Master Plan) would be implemented under Alternative 1. Therefore, impacts under Alternative 1 would be potentially significant related to the release of petroleum products to the environment *(potentially significant; greater impact*).

As discussed in Section 4.10, the proposed Master Plan area is located CAL FIRE-designated Fire Hazard Severity Zones including both Very High Fire Hazard Severity Zone (VHFHSZ) and High Fire Hazard Severity Zone (HFHSZ). Proposed Master Plan construction, demolition, and renovation projects along the northern and northwestern edges of the built portion of the main campus in the VHFHSZ could be subject to increased ignition potential resulting from construction equipment and related activities due to the proximity of native vegetation communities, a potentially significant impact. This impact would be reduced to less than significant with the implementation of identified mitigation measures. Alternative 1 would result in less new building space than the proposed Master Plan and less construction overall; however, the 2000 Master Plan EIR did not evaluate wildfire impacts and no mitigation measures (i.e., MM-HAZ-2 and MM-HAZ-3 under the proposed Master Plan) would be implemented under Alternative 1. Therefore, impacts under Alternative 1 could be potentially significant related to wildfire risks (*potentially significant; greater impact*).

Hydrology and Water Quality

As discussed in Section 4.11, Hydrology and Water Quality, impacts of the proposed Master Plan would be less than significant through compliance with identified PDFs and regulatory requirements. Alternative 1 would result in less new building space than the proposed Master Plan and less construction overall and therefore would result in less

new impervious area and construction disturbance. Therefore, hydrology and water quality impacts would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Land Use and Planning

As discussed in Section 4.12, Land Use and Planning, the proposed Master Plan ensures that campus growth is contained within its existing boundaries, avoiding expansion into areas that could potentially disrupt or physically divide adjacent communities. Similarly, Alternative 1 would only involve development within the campus boundaries and would not impact any established communities (*less than significant; same impact*).

Additionally, impacts of the proposed Master Plan related to conflicts with land use plans, policies, and regulations would be less than significant, as proposed development would be consistent with the proposed Master Plan, once adopted, and therefore would not conflict the adopted plans, policies and regulations set forth by the CSU Board of Trustees for the Cal Poly Pomona campus. Similarly, Alternative 1 would result in continued development under the existing 2000 Master Plan and would not conflict with this plan (*less than significant; same impact*).

Noise and Vibration

As discussed in Section 4.13, Noise and Vibration, construction of the proposed Master Plan could result in noise levels exceeding the Federal Transit Administration (FTA) thresholds for on-campus sensitive receivers including those in the University Library (Building 15) and residence halls (Buildings 54, 60, 61. 62. 63, 73, and 74), a potentially significant impact. Implementation of a mitigation measure would reduce this impact to less than significant. Alternative 1 does not propose any construction activities within the distances shown in Section 4.12, Table 4.12-8 and therefore would avoid significant noise impacts to sensitive receivers (*less than significant; lesser impact*).

Additionally, the proposed Master Plan was determined to result in a potentially significant operational noise impact related to replacement of the Soccer Field and Kellogg Stadium and construction of a new Softball Facility, which would facilitate new or expanded sporting events. Implementation of a mitigation measure would reduce this impact to less than significant. Alternative 1 does not include any of these projects nor would it otherwise facilitate new or expanded sporting events that could result in significant operational noise impacts. Noise impacts would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Population and Housing

As discussed in Section 4.14, Population and Housing, impacts of the proposed Master Plan would be less than significant regarding unplanned population growth and displacement of existing people or housing. With Alternative 1, the proposed Master Plan and enrollment increase to approximately 30,000 FTES would not be adopted, and the campus would continue to operate under the previously adopted 2000 Master Plan. Given that Alternative 1 does not propose any new housing and would not otherwise induce population growth or displace existing people or housing, impacts would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Public Services

As discussed in Section 4.15, Public Services, impacts of the proposed Master Plan would be less than significant related to the need for new or physically altered fire and police facilities, schools, parks, and other public facilities. Alternative 1 would result in less population growth than the proposed Master Plan and therefore the demand for new or physically altered public services and facilities would be reduced (*less than significant; lesser impact*).

Recreation

As discussed in Section 4.16, Recreation, impacts of the proposed Master Plan related to deterioration of existing recreation facilities or the construction of new recreational facilities would be less than significant. Alternative 1 would result in less population growth than the proposed Master Plan and therefore impacts associated with the deterioration of parks and recreation facilities or need for new parks or facilities would be reduced (*less than significant; lesser impact*).

Transportation

As discussed in Section 4.17, Transportation, impacts of the proposed Master Plan would be less than significant regarding conflict with plans, ordinances, or policies addressing the circulation system; vehicle miles traveled; hazards due to geometric design features or incompatible uses; and emergency access. Alternative 1 does not propose any changes to the campus circulation system, and would result in less vehicle miles traveled than the proposed Master Plan due to less population growth. Thus, transportation impacts would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Tribal Cultural Resources

As discussed in Section 4.18, Tribal Cultural Resources, based on the general sensitivity of the area as the historic site of Native American tribal occupation, as well as an archival newspaper report indicating "sporadic" past discovery of tribal cultural resources (TCRs) during construction of one or more buildings, the unanticipated discovery of unknown TCRs during project construction is a possibility and the impact of the proposed Master Plan on such resources would be potentially significant. Implementation of identified mitigation measures would reduce this impact to less than significant. Under Alternative 1, there would be less ground disturbance required to build the remaining projects from the 2000 Master Plan compared to development under the proposed Master Plan, and therefore less potential for inadvertent discovery of TCRs during construction. However, no mitigation measures for inadvertent discovery of tribal cultural resources (i.e., MM-TCR-1, MM-TCR-2, and MM-TCR-3, under the proposed Master Plan) would be implemented under Alternative 1. Therefore, impacts under Alternative 1 could be potentially significant related to the inadvertent discovery of tribal cultural resources (*potentially significant; greater impact*).

Utilities and Service Systems

As discussed in Section 4.19, Utilities and Service Systems, impacts of the proposed Master Plan would be less than significant regarding relocation or construction of new or expanded facilities for water, wastewater, stormwater, electric power, natural gas, and telecommunications; sufficient water supplies during normal, dry, and multiple dry years; wastewater treatment capacity; solid waste capacity; and compliance with solid waste regulations. Given that Alternative 1 would result in less population and less new building space than the proposed Master Plan, there would be reduced demand for these utilities and service systems. Therefore, impacts under Alternative 1 would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

6.3.1.3 Ability to Meet Project Objectives

Development under Alternative 1 would fail to meet all of the project objectives because it would not: accommodate enrollment growth to 30,000 FTES and associated physical development on the main campus (Objective 1); renovate or demolish any buildings that are inefficient in terms of operation, maintenance, or user comfort (Objective 2); replace any buildings with higher density, mixed-use buildings (Objective 3); strengthen campus

residential life by constructing new and replacement student housing, increasing the diversity of housing types, providing affordable housing, and including common spaces for students (Objective 4); preserve space in the campus core for academic and student-focused uses (most remaining development under this alternative would occur outside the core) (Objective 5); provide additional recreational space for I-Poly High School students (Objective 6); provide mobility enhancements for safe, sustainable, and accessible circulation (Objective 7); provide high-quality athletic facilities and optimize existing recreation fields (Objective 8); update infrastructure (Objective 9); or construct or renovate buildings to meet LEED certification requirements (Objective 10).

6.3.2 Alternative 2: Reduced Development/Historic Building Demolition Alternative

6.3.2.1 Summary of Proposed Master Plan Historic Resource Impacts

The Historical Resources Technical Report (HRTR) prepared for the proposed Master Plan (Appendix D-2) identified a total of 34 properties within the area of potential impact (API) that qualify as historical resources pursuant to CEQA (another 48 properties of the survey sample did not qualify as historical resources). This number includes 3 historic districts: the W.K. Kellogg Arabian Horse Ranch Historic District (with 15 contributing resources), the Mid-Century Modern Campus Core Historic District (with 14 contributing resources), and the Arabian Horse Center Historic District (with 5 contributing resources). A total of 9 historic district contributors are also individually eligible for landmark designation at the federal and/or state levels. In addition, over the course of the proposed Master Plan building horizon (through 2040), another 20 properties will reach the age threshold (45 years) at which a historical resources evaluation will be warranted. See the HRTR for full evaluations and results (Appendix D-2).

Overall, many proposed Master Plan projects (1) would not involve physical changes to identified historical resources; (2) are not adjacent to historical resources; and/or (3) do not involve properties that will reach 45 years of age by 2040, the year marking build-out of the proposed Master Plan. In addition, the proposed Master Plan prioritizes retention of facilities and minimal demolition and new construction. As indicated in Section 4.6, Cultural Resources - Historic Resources and Appendix D-2, many of the planned projects do not involve a historical resource.

However, as a result of the impacts analysis provided in Section 4.6, Cultural Resources - Historic Resources, and Appendix D-2, four significant, direct adverse impacts to historical resources were identified related to proposed Master Plan:

1. Mid-Century Modern Campus Core Historic District
2. College of Environmental Design (Building 7)
3. Library (Building 15)
4. Arabian Horse Center Historic District

Proposed Master Plan projects that could result in significant adverse impacts to historical resources include, but are not necessarily limited to, demolition, major/total renovations involving changes to exterior building envelopes, and adjacent new construction that could directly or indirectly affect identified historical resources. In particular, Table 6-1 summarizes the historic resources that involve proposed Master Plan demolitions or renovations that involve changes to exterior building envelopes, most of which would take place in the Mid-Century Modern Campus Core Historic District. Proposed demolitions or renovations that involve changes to exterior building envelopes have the greatest impact on historic resources and therefore are the focus of Alternative 2, Reduced

Development/Historic Preservation Alternative, and Alternative 3, Reduced Development/Adaptive Reuse Alternative, as described below.

Table 6-1. Historic Resources Involving Proposed Master Plan Demolitions or Changes to Exterior Building Envelopes

No.	Name	CEQA Historical Resource	District Contributor	Individually Eligible	Proposed Master Plan	Potentially Significant Direct or Indirect Impact
Mid-Century Modern Campus Core Historic District						
1	Building One (Old Administration)	Yes	Yes	No	Renovation	Potential direct impact to historic district through physical changes to a contributing element of the district
2	College of Agriculture	Yes	Yes	No	Renovation	Potential direct impact to historic district through physical changes to a contributing element of the district
5	College of Letters, Arts, and Social Sciences	Yes	Yes	No	Renovation including changes to exterior building envelop	Potential direct impact to historic district through physical changes to a contributing element of the district
6	College of Education and Integrative Studies	Yes	Yes	No	Renovation	Potential direct impact to historic district through physical changes to a contributing element of the district
7	College of Environmental Design	Yes	Yes	Yes	Renovation including changes to exterior building envelop	Potential direct impact to historic district and to the College of Environmental Design through physical changes to a contributing element of the district
8	College of Science	Yes	Yes	No	Renovation including changes to exterior building envelop	Potential direct impact through physical changes to a contributing element of the district
9	College of Engineering	Yes	Yes	No	New Construction, Engineering Graduate Building (Building 14) Renovation of Engineering Labs (Building 17) and College	Potential indirect impact through change to setting and feeling of the district and to the University Library (Building 15) Potential direct impact to the historic district through physical

Table 6-1. Historic Resources Involving Proposed Master Plan Demolitions or Changes to Exterior Building Envelopes

No.	Name	CEQA Historical Resource	District Contributor	Individually Eligible	Proposed Master Plan	Potentially Significant Direct or Indirect Impact
					of Engineering (Building 9) including changes to exterior building envelopes	changes to a contributing element of the district
15	Library	Yes	Yes	Yes	Renovation including exterior site improvements	Potential direct impact to an individually eligible historical resource and to the historic district
24	Music (Arts Complex)	Yes	Yes	No	Major Renovation and Addition	Potential direct impact to historic district, through a possible loss of character-defining features and historic integrity of contributing properties
25	Drama Department/ Theatre (Arts Complex)	Yes	Yes	No	Total Renovation or Replacement	Potential direct impact to the historic district, through a possible loss of the contributing property and/or loss of character-defining features and historic integrity
97	Campus Center	Yes	Yes	No	Demolition and replacement of Campus Center and Interdisciplinary Academic Resources Building (Building 10)	Potential direct impact to the historic district through a possible loss of the contributing property and/or loss of character-defining features and historic integrity
W.K. Kellogg Arabian Horse Center Historic District						
29	W.K. Kellogg Arabian Horse Center	Yes	Yes	No	Renovation and Event Center addition	Potential direct impact through renovations to a contributing feature to the historic district. Impacts could result through a possible loss of character-defining features and historic integrity of a contributing property

6.3.2.2 Alternative 2: Reduced Development/Historic Preservation Alternative

Description of Alternative 2

Alternative 2 focuses on proposed development on the Cal Poly Pomona campus that would avoid demolition of historic buildings and/or historic district contributors that are identified in Table 6-1. While Mitigation Measures MM-HBE-1 through MM-HBE-5, identified in Section 4.6, Cultural Resources - Historic Resources, would lessen and/or avoid some significant adverse impacts to historical resources, the impacts would still be significant unavoidable, as mitigation cannot avoid significant impacts associated with building demolition. Even with mitigation, such impacts would still constitute substantial adverse changes in the significance of historical resources as the significance of historical resources would be materially impaired under CEQA Guidelines Section 15064.5.

Under Alternative 2, no historic buildings or historic district contributors would be demolished. It should be noted that avoiding building demolition may not be feasible and would need to be assessed on a project-by-project basis. However, for the purposes of this alternative avoiding building demolition is assumed. Specifically, Alternative 2 would avoid the demolition of the 39,000 GSF Campus Center (Building 97). Instead, this building would be renovated. However, the proposed 155,000 GSF of space for both the Campus Center and the Interdisciplinary Academic Resources Building anticipated under the proposed Master Plan would not be achieved by Alternative 2. Additionally, Alternative 2 would include only renovation of the existing 45,795 GSF Drama and Theatre (Building 25) and would not include potential replacement of the building, which would involve demolition of the existing building. (Chapter 3, Project Description, indicates that the existing Building 25 would either be renovated or replaced.) Overall, Alternative 2 would reduce the total net increase of approximately 600,000 GSF of building space under the proposed Master Plan by approximately 100,000 GSF and therefore would result in approximately 500,000 GSF of building space.

All other components of the proposed Master Plan would be the same under Alternative 2, including proposed building renovations. All Project Design Features (PDFs) identified in Chapter 3, Project Description, and all mitigation measures identified in Chapter 4, Environmental Setting, Impacts, and Mitigation Measures, would also be implemented under Alternative 2.

Impact Analysis

Aesthetics

As discussed in Section 4.1, Aesthetics, impacts of the proposed Master Plan would be less than significant regarding scenic quality, and conflicts with applicable state and CSU regulations and policies governing scenic quality. Construction activities associated with the buildout of Alternative 2 would result in temporary, short-term visual impacts that would not be present following completion of construction, the same as the proposed Master Plan. Upon buildout, Alternative 2 would be more visually similar to current conditions within the campus core, compared to the proposed Master Plan. This is because Alternative 2 would only renovate, rather than demolish and replace, the Campus Center (Building 97) and Drama and Theatre (Building 25). Additionally, these renovation projects would be designed and constructed in compliance with the Secretary's Standards and would be subject to the CSU schematic design review process. This would ensure that renovation projects under Alternative 2 would be visually compatible with existing development and appropriate in design and quality. Overall, impacts to scenic

quality within the campus core would be similar, but slightly reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

The proposed Master Plan would result in potentially significant light and glare impacts due to the use of construction lighting and introduction of reflective surfaces on new or renovated buildings. However, implementation of MM-AES-1 and MM-AES-2 would ensure that construction lighting is arranged in a manner that would not directly shine on or produce glare affecting adjacent motorists and residential uses, and that building structures would not contain large expanses of reflective surfaces, thereby reducing light and glare impacts to less than significant. The same as the proposed Master Plan, Alternative 2 would require implementation of these mitigation measures to ensure that light and glare impacts are less than significant. Impacts under Alternative 2 would therefore be similar to the proposed Master Plan (*less than significant with mitigation; same impact*).

Agriculture and Forestry Resources

As discussed in Section 4.2, Agriculture and Forestry Resources, all projects under the proposed Master Plan would occur in areas absent of important agriculture or forestry resources, and no conversion of land to non-agriculture uses would occur. Alternative 2 would not introduce any new components occurring on agricultural land or that would otherwise impact agricultural resources. Therefore, impacts under Alternative 2 would remain similar to the proposed Master Plan (*less than significant; same impact*).

Air Quality

As discussed in Section 4.3, Air Quality, impacts of the proposed Master Plan would be less than significant regarding conflicts with the applicable air quality plan, increase of criteria pollutants, exposure of sensitive receptors to substantial pollutant concentrations, or other emissions such as those leading to odors. Compared to the proposed Master Plan, development of Alternative 2 would result in a reduction of 100,000 GSF of new building space. This would result in fewer air pollutant emissions during construction and operation and accordingly, air quality impacts under Alternative 2 would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Biological Resources

As discussed in Section 4.4, Biological Resources, the proposed Master Plan could potentially result in significant adverse effects to several special-status plant and wildlife species, to bird species protected by the California Fish and Game Code and by the federal Migratory Bird Treaty Act (MBTA), to sensitive habitat, and to jurisdictional aquatic resources. Implementation of mitigation measures MM-BIO-1 (Project-Specific Biological Assessments 1-6), MM-BIO-2 (Sensitive Vegetation Communities Protection and Replacement), MM-BIO-3 (Nesting Bird Avoidance), MM-BIO-4 (Biological Monitoring), and MM-BIO-5 (WEAP), MM-BIO-6 (Demarcation of Disturbance Limits), MM-BIO-7-1 (Access Controls and Signage), MM-BIO-7-2 (Invasive Plant Controls), MM-BIO-7-3 (Lighting Controls), and MM-BIO-8 (Aquatic Resource Permitting and Mitigation) would reduce impacts to these species and habitats to less than significant.

Although potentially suitable habitat for most of the special-status species are limited to open space areas in the northwestern and western portions of the campus, special-status bats and protected bird species could nest/roost in buildings and some mature trees present in both the open space and developed portions of the campus. Under Alternative 2, the Campus Center (Building 97) and Drama and Theatre (Building 25) would be renovated rather than demolished and replaced, resulting in a reduction of 100,000 GSF of new building space compared to the

proposed Master Plan. Given the reduced building intensity and scope of construction activities in this developed area of campus, Alternative 2 would result in less potential for disturbance to special-status bats and protected bird species and their nursery sites. Nonetheless, implementation of mitigation measures MM-BIO-1 through MM-BIO-8 would be required under Alternative 2 to ensure that impacts to special-status plant and wildlife species and native wildlife nursery sites, and other biological resource impacts are reduced to less than significant *(less than significant with mitigation; lesser impact)*.

Cultural Resources

Archaeological Resources

As discussed in Section 4.5, Cultural Resources – Archaeological Resources, there is moderate potential for the inadvertent discovery of subsurface archaeological resources if ground disturbance occurs in native soils. Additionally, there is also possibility of encountering human remains during construction activities. However, implementation of mitigation measures would reduce these proposed Master Plan impacts to less than significant. MM-CUL-1 (Additional Cultural Resources Inventory Efforts) requires the completion of a cultural resources inventory for proposed Master Plan projects located outside the archaeological area of potential effect (API), MM-CUL-2 (Cultural Resources Sensitivity Training) requires cultural resources sensitivity training for construction crews prior to initiation of ground-disturbing activities, MM-CUL-3 (Cultural Resources Monitoring and Inadvertent Discovery Protocols) requires archaeological monitoring during all ground-disturbing activities, and MM-CUL-4 (Treatment of Human Remains) requires adherence to state requirements if human remains are found.

Under Alternative 2, there may be less ground disturbance required for the renovation of the Campus Center (Building 97) and Drama and Theatre (Building 25) compared to the proposed Master Plan, but Alternative 2 would still be required to implement all the above mitigation measures to reduce impacts associated with inadvertent discovery of archaeological resources and human remains *(less than significant with mitigation; lesser impact)*.

Historic Resources

As discussed in Section 4.6, Cultural Resources – Historic Resources, the proposed Master Plan would result in a significant and unavoidable impact from demolition of historic buildings and/or historic district contributors even after implementation of MM-HBE-1 through MM-HBE-5. Alternative 2 aims to reduce this impact by avoiding demolition of the Campus Center (Building 97) and Drama and Theatre (Building 25), which are both CEQA historical resources and contributors to the Mid-Century Modern Campus Core Historic District. These buildings would be renovated, rather than demolished and replaced as specified under the proposed Master Plan. However, renovations to these buildings and other buildings could still result in significant adverse impacts and material impairment to historical resources through the loss of character-defining features and therefore historic integrity. There would also be impacts to other historic resources or contributors to historic districts such as the Library (Building 15) and Arabian Horse Center Historic District, which would remain the same as the proposed Master Plan. Even with mitigation, such impacts would still constitute substantial adverse changes in the significance of historical resources as the significance of historical resources would be materially impaired under CEQA Guidelines Section 15064.5. Therefore, impacts to historic resources would still be significant unavoidable under Alternative 2, albeit reduced compared to the proposed Master Plan *(significant unavoidable; lesser impact).*

Energy

As discussed in Section 4.7, Energy, impacts of the proposed Master Plan would be less than significant regarding consumption of energy resources and conflict with energy plans. Given that Alternative 2 would result in less new building space than the proposed Master Plan, there would be less energy resources consumed during construction and operation of Alternative 2. Therefore, energy impacts would remain less than significant but would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Geology and Paleontology

As discussed in Section 4.8, Geology and Paleontology, impacts of the proposed Master Plan would be less than significant regarding geology and soils. However, impacts of the proposed Master Plan would be potentially significant regarding paleontological resources due to the campus' high paleontological sensitivity. Implementation of MM-GEO-1 would reduce this impact to less than significant.

Under Alternative 2, geologic risks such as rupture of faults, ground shaking, liquefaction, and landslides would remain the same as the proposed Master Plan because those risks are dependent on physical conditions in the project area. However, impacts related to soil erosion and damage to paleontological resources during construction would be slightly reduced compared to the proposed Master Plan due to less ground disturbance required for the renovation of the Campus Center (Building 97) and Drama and Theatre (Building 25). Nonetheless, there is still the potential for damage to paleontological resources during construction under Alternative 2, and implementation of MM-GEO-1 would be required to reduce this impact to less than significant. (*less than significant with mitigation; lesser impact).*

Greenhouse Gas Emissions

As discussed in Section 4.9, Greenhouse Gas Emissions, the proposed Master Plan would not result in greenhouse gas emissions that would exceed the campus-specific mass emissions threshold, nor would the proposed Master Plan conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases and therefore impacts would be less than significant. Given that Alternative 2 would result in less new building space than the proposed Master Plan, there would be less greenhouse gas emissions during construction and operation of Alternative 2. Therefore, greenhouse gas emissions impacts would remain less than significant, but would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Hazards and Hazardous Materials

As discussed in Section 4.10, Hazards and Hazardous Materials, a Cortese List database search revealed documentation of a closed LUST case and a list of 21 operational USTs present throughout the main campus. The exact location of the LUST and USTs are unknown; therefore, there is potential for proposed Master Plan construction activities to result in release of petroleum products to the environment, a potentially significant impact requiring MM-HAZ-1 to reduce the impact to less than significant. As with the proposed Master Plan, Alternative 2 would require implementation of MM-HAZ-1 to reduce impacts to less than significant. Impacts would be somewhat reduced compared to the proposed Master Plan (*less than significant with mitigation; lesser impact*).

As discussed in Section 4.10, the proposed Master Plan area is located in CAL FIRE-designated Fire Hazard Severity Zones including both Very High Fire Hazard Severity Zone (VHFHSZ) and High Fire Hazard Severity Zone (HFHSZ). Proposed Master Plan construction, demolition, and renovation projects along the northern and northwestern edges

of the built portion of the main campus in the VHFHSZ could be subject to increased ignition potential resulting from construction equipment and related activities due to the proximity of native vegetation communities, a potentially significant impact. This impact would be reduced to less than significant with the implementation of MM-HAZ-2 and MM-HAZ-3. Given that Alternative 2 would result in less new building space than the proposed Master Plan and less construction overall, wildfire impacts would be reduced compared to the proposed Master Plan; however, the identified mitigation measures would be required to reduce impacts (*less than significant with mitigation; lesser impact*).

Hydrology and Water Quality

As discussed in Section 4.11, Hydrology and Water Quality, impacts of the proposed Master Plan would be less than significant through compliance with identified PDFs and regulatory requirements. Alternative 2 is similar to the proposed Master Plan but would result in less new impervious area and construction disturbance, given that there would be a reduction of 100,000 GSF of new building space compared to the proposed Master Plan. Implementation of the PDFs combined with consistency with the National Pollutant Discharge Elimination System (NPDES) permit, and the Cal Poly Pomona stormwater management plan (SWMP) would ensure that potential water quality impacts would remain less than significant and reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Land Use and Planning

As discussed in Section 4.12, Land Use and Planning, the proposed Master Plan ensures that campus growth is contained within its existing boundaries, avoiding expansion into areas that could potentially disrupt or physically divide adjacent communities. Similarly, Alternative 2 would only involve development within the campus boundaries and would not impact any established communities (*less than significant; same impact*).

Additionally, impacts of the proposed Master Plan related to conflicts with land use plans, policies, and regulations would be less than significant, as proposed development would be consistent with the proposed Master Plan, once adopted, and therefore would not conflict the adopted plans, policies and regulations set forth by the CSU Board of Trustees for the Cal Poly Pomona campus. Similarly, Alternative 2 would result in development under a refined proposed Master Plan with reduced GSF and would not conflict with such a refined plan, once adopted (*less than significant; same impact*).

Noise and Vibration

As discussed in Section 4.13, Noise and Vibration, construction of the proposed Master Plan could result in noise levels exceeding the FTA thresholds for on-campus sensitive receivers including those in the University Library (Building 15) and residence halls (Buildings 54, 60, 61. 62, 63, 73, and 74), resulting in a potentially significant impact. Implementation of MM-NOI-1 would reduce this impact to less than significant. Although Alternative 2 would require less construction than the proposed Master Plan due to the reduction of 100,000 GSF of new building space, there is still potential for construction activities within the distances shown in Section 4.12, Table 4.12-8 to result in significant noise impacts to sensitive receivers. Thus, Alternative 2 would require implementation of MM-NOI-1, which would avoid substantial temporary increases in ambient noise levels during construction of buildings and infrastructure improvements by: limiting construction noise to the less sensitive times of day; properly maintaining all construction equipment; ensuring all equipment is properly equipped with noise-reducing air intakes, exhaust mufflers, and engine shrouds; using electrical power to run power tools and to power temporary structures; siting all stationary construction equipment and staging areas as far away as feasible from residences and educational

land uses; and implementing special procedures when construction activities are expected to occur less than 175 feet from existing residences. Although the potential for noise impacts would be reduced compared to the proposed Master Plan, Alternative 2 would still require implementation of MM-NOI-1 to reduce construction noise impacts to less than significant (*less than significant with mitigation; lesser impact*).

Additionally, the proposed Master Plan was determined to result in a potentially significant operational noise impact related to replacement of the Soccer Field and Kellogg Stadium, and construction of a new Softball Facility, which would facilitate new or expanded sporting events. Implementation of MM-NOI-2 would reduce this impact to less than significant. Alternative 2 would also include these projects and therefore operational noise impacts would be the same as the proposed Master Plan. Noise from these sporting events could exceed the operational noise threshold and therefore implementation of MM-NOI-2 would be required to avoid substantial increases in ambient noise levels during the hosting of large competitive matches by: incorporating facility design components to shield noise propagation, ensuring loudspeakers are oriented properly to face away from adjacent noise sensitive receivers, employing noise barriers at the perimeter of the facility boundary as appropriate, and/or other methods and procedures identified as necessary in a facility-specific noise assessment. This would reduce operational noise impacts to less than significant, the same as the proposed Master Plan (*less than significant with mitigation; same impact*).

Population and Housing

As discussed in Section 4.14, Population and Housing, impacts of the proposed Master Plan would be less than significant regarding unplanned population growth and displacement of existing people or housing. As with the proposed Master Plan, Alternative 2 would also include 1,040 new beds from the Student Housing Replacement Project (Phase III) resulting in a total of 5,109 beds on campus (including existing beds and already approved but not yet constructed projects). The changes proposed to the Campus Center (Building 97) and Drama and Theatre (Building 25) under Alternative 2 would not impact student population. Additionally, development under Alternative 2 would not result in the permanent removal of any housing on campus, nor would it result in the substantial displacement of people on the campus, the same as the proposed Master Plan. Impacts would remain less than significant (*less than significant; same impact*).

Public Services

As discussed in Section 4.15, Public Services, impacts of the proposed Master Plan would be less than significant related to the need for new or physically altered fire and police facilities, schools, parks, and other public facilities. The changes proposed to the Campus Center (Building 97) and Drama and Theatre (Building 25) under Alternative 2 would not affect demand for new or physically altered public services and facilities compared to the proposed Master Plan. Impacts would remain less than significant, the same as the proposed Master Plan (*less than significant; same impact*).

Recreation

As discussed in Section 4.16, Recreation, impacts of the proposed Master Plan would be less than significant related to deterioration of existing recreation facilities or the construction of new recreational facilities. The changes proposed to the Campus Center (Building 97) and Drama and Theatre (Building 25) under Alternative 2 would not affect demand for new or physically altered parks or recreational facilities compared to the proposed Master Plan. Impacts would remain less than significant, the same as the proposed Master Plan (*less than significant; same impact*).

Transportation

As discussed in Section 4.17, Transportation, impacts of the proposed Master Plan would be less than significant regarding conflict with plans, ordinances, or policies addressing the circulation system; vehicle miles traveled; hazards due to geometric design features or incompatible uses; and emergency access. Given that Alternative 2 is similar to the proposed Master Plan and the changes proposed to the Campus Center (Building 97) and Drama and Theatre (Building 25) would not impact any transportation features, impacts would remain less than significant. Transportation impacts under Alternative 2 would remain the same as the proposed Master Plan (*less than significant; same impact*).

Tribal Cultural Resources

As discussed in Section 4.18, Tribal Cultural Resources, based on the general sensitivity of the area as the historic site of Native American tribal occupation, as well as an archival newspaper report indicating "sporadic" past discovery of TCRs during construction of one or more buildings, the unanticipated discovery of unknown TCRs during project construction is a possibility and the impact of the proposed Master Plan on such resources would be potentially significant. Implementation of MM-TRC-1, MM-TRC-2, and MM-TRC-3 would reduce this impact to less than significant. Under Alternative 2, there may be less ground disturbance required for the renovation of the Campus Center (Building 97) and Drama and Theatre (Building 25) compared to the proposed Master Plan, but Alternative 2 would still be required to implement all the above mitigation measures to reduce impacts associated with inadvertent discovery of TCRs. Therefore, impacts to TCRs would be less than significant after mitigation under Alternative 2, albeit reduced compared to the proposed Master Plan (*less than significant with mitigation; lesser impact*).

Utilities and Service Systems

As discussed in Section 4.19, Utilities and Service Systems, impacts of the proposed Master Plan would be less than significant regarding relocation or construction of new or expanded facilities for water, wastewater, stormwater, electric power, natural gas, and telecommunications; sufficient water supplies during normal, dry, and multiple dry years; wastewater treatment capacity; solid waste capacity; and compliance with solid waste regulations. Given that Alternative 2 would result in less new building space than the proposed Master Plan, there would be less demand for these utilities and service systems. Therefore, impacts under Alternative 2 would remain less than significant, but would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Ability to Meet Project Objectives

Development under Alternative 2 would only renovate the Campus Center (Building 97) and Drama and Theatre (Building 25) rather than demolish and replace these buildings, which would reduce the total net increase of approximately 600,000 GSF of building space under the proposed Master Plan by approximately 100,000 GSF. Alternative 2 would not achieve the proposed 155,000 GSF of space for both the Campus Center and the Interdisciplinary Academic Resources Building anticipated under the proposed Master Plan. The Campus Center replacement under the proposed Master Plan is intended to add study space, support student success, and to support projected demand for instructional space. The potential replacement of the Drama and Theatre building under the proposed Master Plan is intended to address years of deferred maintenance and to meet performance venue standards. Given that Alternative 2 would not include these replacement projects, Alternative 2 would not fully achieve the following objectives: accommodate enrollment growth to 30,000 FTES and associated physical development on the main campus (Objective 1); renovate or demolish any buildings that are inefficient in terms of operation,

maintenance, or user comfort (Objective 2); replace any buildings with higher density, mixed-use buildings (Objective 3); and preserve space in the campus core for academic and student-focused uses (Objective 5).

Development under Alternative 2 would achieve the remaining project objectives to the same extent as the proposed Master Plan as it would: strengthen campus residential life by constructing new and replacement student housing (Objective 4); provide additional recreational space for I-Poly High School students (Objective 6); provide mobility enhancements for safe, sustainable, and accessible circulation (Objective 7); provide high-quality athletic facilities and optimize existing recreation fields (Objective 8); update infrastructure (Objective 9); or construct or renovate buildings to meet LEED certification requirements (Objective 10).

6.3.3 Alternative 3: Reduced Development/Adaptive Reuse Alternative

6.3.3.1 Description of Alternative 3

Alternative 3 focuses on proposed development on the Cal Poly Pomona campus that would avoid demolition and renovations that involve changes to exterior building envelopes of historic buildings and/or historic district contributors (see Table 6-1). Section 6.3.2.1, Summary of Proposed Master Plan Historic Resource Impacts, provides a summary of historic resource impacts provided in detail in Section 4.6, Cultural Resources - Historic Resources and in the HRTR (Appendix D-2). While Mitigation Measures MM-HBE-1 through MM-HBE-5, would lessen and/or avoid some significant adverse impacts to historical resources under the proposed Master Plan, the impacts could still be significant unavoidable, as mitigation may not avoid significant impacts associated with building demolitions and renovations involving changes to the exterior building envelopes. Even with mitigation, such impacts could still constitute substantial adverse changes in the significance of historical resources as the significance of historical resources could be materially impaired under CEQA Guidelines Section 15064.5.

Under Alternative 3, no historic buildings or historic district contributors would be demolished, and all proposed renovations would be implemented without changes to the exterior building envelopes and in conformance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer (Secretary's Standards). It should be noted that avoiding building demolition and designing and constructing all renovations in accordance with the Secretary's Standards may not be feasible in all instances and would need to be assessed on a project-by-project basis. However, for the purposes of this alternative both avoiding building demolition and designing and constructing all renovations in accordance with the Secretary's Standards are assumed.

Specifically, Alternative 3 addresses demolition and/or renovations to Old Administration (Building 1); College of Agriculture (Building 2); College of Letters, Arts, and Social Sciences (Building 5); College of Education and Integrative Studies (Building 6); College of Environmental Design (Building 7); College of Science (Building 8); College of Engineering (Building 9 and Building 17); Library (Building 15); Music (Arts Complex) (Building 24); Drama and Theatre (Arts Complex) (Building 25); Campus Center (Building 97); and W. K. Kellogg Arabian Horse Center (Building 29). All renovations would be designed and constructed per the Secretary's Standards. Additions to Music (Arts Complex) (Building 24) and W. K. Kellogg Arabian Horse Center (Building 29), would also be designed and constructed per the Secretary's Standards. Typically, an addition that complies with the Secretary's Standards would be visually subordinate and compatible but differentiated.

Similar to Alternative 2, Alternative 3 would avoid the demolition of the 39,000 GSF Campus Center (Building 97). Instead, this building would be renovated per the Secretary's Standards. However, the proposed 155,000 GSF of

space for both the Campus Center and the Interdisciplinary Academic Resources Building anticipated under the proposed Master Plan would also not be achieved by Alternative 3.

Additionally, Alternative 3 would also include only renovation of the existing 45,795 GSF Drama and Theatre (Building 25) per the Secretary's Standards and would not include potential replacement of the building**,** which would involve demolition of the existing building. (Chapter 3, Project Description, indicates that the existing Building 25 would either be renovated or replaced.) Overall, Alternative 3 would also reduce the total net increase of approximately 600,000 GSF of building space under the proposed Master Plan by approximately 100,000 GSF and therefore would result in approximately 500,000 GSF of building space.

It should be noted that avoiding building demolition and designing and constructing all renovations in accordance with the Secretary's Standards may not be feasible in all instances and would need to be assessed on a project-by-project basis. However, for the purposes of this alternative both avoiding building demolition and designing and constructing all renovations in accordance with the Secretary's Standards are assumed.

All PDFs identified in Chapter 3, Project Description, and all mitigation measures identified in Chapter 4, Environmental Setting, Impacts, and Mitigation Measures, would also be implemented under Alternative 3.

6.3.3.2 Impact Analysis

Aesthetics

As discussed in Section 4.1, Aesthetics, impacts of the proposed Master Plan would be less than significant regarding scenic quality and conflicts with applicable state and CSU regulations and policies governing scenic quality. Construction activities associated with the buildout of Alternative 3 would result in temporary, short-term visual impacts that would not be present following completion of construction. Upon buildout, Alternative 3 would be more visually similar to current conditions within the campus, compared to the proposed Master Plan. This is because Alternative 3 would only renovate, rather than demolish and replace, the Campus Center (Building 97) and Drama and Theatre (Building 25). Additionally, all other renovations and additions would be designed and constructed in compliance with the Secretary's Standards and would be subject to the CSU schematic design review process. This would ensure that development under Alternative 3 would be visually compatible with existing development and appropriate in design and quality. Overall, impacts to scenic quality throughout the campus would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

The proposed Master Plan would result in potentially significant light and glare impacts due to the use of construction lighting and introduction of reflective surfaces on new or renovated buildings. However, implementation of MM-AES-1 and MM-AES-2 would ensure that construction lighting is arranged in a manner that would not directly shine on or produce glare affecting adjacent motorists and residential uses, and that building structures would not contain large expanses of reflective surfaces, thereby reducing light and glare impacts to less than significant. Alternative 3 would avoid changes to exterior building envelopes for historic buildings and historic district contributors, and therefore would result in fewer new light fixtures and reflective surfaces associated with building renovations. Nonetheless, Alternative 3 would require implementation of MM-AES-1 and MM-AES-2 to ensure that light and glare impacts from new light fixtures and reflective surfaces from the other remaining projects are less than significant. Impacts under Alternative 3 would therefore be reduced compared to the proposed Master Plan but would still require mitigation to reduce potential impacts to less than significant (*less than significant with mitigation; lesser impact*).

Agriculture and Forestry Resources

As discussed in Section 4.2, Agriculture and Forestry Resources, all projects under the proposed Master Plan would occur in areas absent of important agriculture or forestry resources, and no conversion of land to non-agriculture uses would occur. Alternative 3 would not introduce any new components occurring on agricultural land or that would otherwise impact agricultural resources. Therefore, impacts under Alternative 3 would remain similar to the proposed Master Plan (*less than significant; same impact*).

Air Quality

As discussed in Section 4.3, Air Quality, the proposed Master Plan would result in less-than-significant impacts regarding conflict with the applicable air quality plan, increase of criteria pollutants, exposure of sensitive receptors to substantial pollutant concentrations, or other emissions such as those leading to odors. Compared to the proposed Master Plan, development of Alternative 3 would result in a reduction of approximately 100,000 GSF of new building space, and would avoid construction emissions associated with renovations to exterior building envelopes of historic buildings and historic district contributors. This would result in fewer air pollutant emissions during construction and operation and accordingly, air quality impacts under Alternative 3 would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Biological Resources

As discussed in Section 4.4, Biological Resources, the proposed Master Plan could potentially result in significant adverse effects to several special-status plant and wildlife species, to bird species protected by the California Fish and Game Code and by the federal MBTA, to sensitive habitat, and to jurisdictional aquatic resources. Implementation of mitigation measures MM-BIO-1 through MM-BIO-8 would reduce impacts to these species and habitats to less than significant.

Although potentially suitable habitat for most of the special-status species are limited to open space areas in the northwestern and western portions of the campus, special-status bats and protected bird species could nest/roost in buildings and some mature trees present in both the open space and developed portions of the campus. Under Alternative 3, the Campus Center (Building 97) and Drama and Theatre (Building 25) would be renovated rather than demolished and replaced, resulting in a reduction of 100,000 GSF of new building space compared to the proposed Master Plan. Given the reduced building intensity and scope of construction activities in these developed areas of the campus, Alternative 3 would result in less potential for disturbance to special-status bats and protected bird species and their nursery sites. Nonetheless, implementation of mitigation measures MM-BIO-1 through MM-BIO-8 would be required under Alternative 3 to ensure that impacts to special-status plant and wildlife species and native wildlife nursery sites, and other biological resource impacts, are reduced to less than significant *(less than significant with mitigation; lesser impact)*.

Cultural Resources

Archaeological Resources

As discussed in Section 4.5, Cultural Resources – Archaeological Resources, there is moderate potential for the inadvertent discovery of subsurface archaeological resources if ground disturbance occurs in native soils. Additionally, there is also possibility of encountering human remains during construction activities. However, implementation of mitigation measures MM-CUL-1 through MM-CUL-4 would reduce these proposed Master Plan

impacts to less than significant. Under Alternative 3, there may be less ground disturbance required for the renovation of the Campus Center (Building 97) and Drama and Theatre (Building 25), and due to the avoidance of changes to exterior building envelopes, compared to the proposed Master Plan. Nonetheless, Alternative 3 would still include projects requiring ground disturbance and would therefore be required to implement all the above mitigation measures to reduce impacts associated with inadvertent discovery of archaeological resources and human remains *(less than significant with mitigation; lesser impact)*.

Historic Resources

As discussed in Section 4.6, Cultural Resources – Historic Resources, the proposed Master Plan would result in a significant unavoidable impact from demolition of historic buildings and/or historic district contributors even after implementation of MM-HBE-1 through MM-HBE-5. Alternative 3 aims to reduce this impact by avoiding building demolitions and renovation to the exterior building envelopes of Old Administration (Building 1); College of Agriculture (Building 2); College of Letters, Arts, and Social Sciences (Building 5); College of Education and Integrative Studies (Building 6); College of Environmental Design (Building 7); College of Science (Building 8); College of Engineering (Building 9 and Building 17); Library (Building 15); Music (Arts Complex) (Building 24); Drama and Theatre (Arts Complex) (Building 25); and Campus Center (Building 97), which are all CEQA historical resources and contributors to the Mid-Century Modern Campus Core Historic District. The Library and College of Environmental Design are also individually eligible historic resources. Alternative 3 would also avoid exterior renovations to the W. K. Kellogg Arabian Horse Center (Building 29), which is a CEQA historical resource and contributor to the W. K. Kellogg Arabian Horse Center Historic District.

As building demolitions would be avoided and all renovations would be designed and constructed per the Secretary's Standards, Alternative 3 would avoid the significant unavoidable impact to historic resources, with the implementation of MM-HBE-1 through MM-HBE-5. Given that Alternative 3 would avoid the potential loss of character-defining features and historic integrity of these buildings, impacts to historic resources would be reduced under Alternative 3 *(less than significant with mitigation; lesser impact)*.

Energy

As discussed in Section 4.7, Energy, impacts of the proposed Master Plan would less than significant regarding consumption of energy resources and conflict with energy plans. Given that Alternative 3 would result in less construction due to the avoidance of historic building demolitions and certain exterior building renovations, and less new building space than the proposed Master Plan, there would be less energy resources consumed during construction and operation of Alternative 3. Therefore, energy impacts would remain less than significant, but would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Geology and Paleontology

As discussed in Section 4.8, Geology and Paleontology, impacts of the proposed Master Plan would be less than significant regarding geology and soils. However, impacts of the proposed Master Plan would be potentially significant regarding paleontological resources due to the campus' high paleontological sensitivity. Implementation of MM-GEO-1 would reduce this impact to less than significant.

Under Alternative 3, geologic risks such as rupture of faults, ground shaking, liquefaction, and landslides would remain the same as the proposed Master Plan because those risks are dependent on physical conditions in the project area. However, impacts related to soil erosion and damage to paleontological resources during construction would be slightly

reduced compared to the proposed Master Plan due to the avoidance of historic building demolition and exterior building renovations and less new building space. Nonetheless, there is still the potential for damage to paleontological resources during construction under Alternative 3, and implementation of MM-GEO-1 would be required to reduce this impact to less than significant (*less than significant with mitigation; lesser impact)*.

Greenhouse Gas Emissions

As discussed in Section 4.9, Greenhouse Gas Emissions, the proposed Master Plan would not result in greenhouse gas emissions that would exceed the campus-specific mass emissions threshold, nor would the proposed Master Plan conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases and therefore impacts would be less than significant. Given that Alternative 3 would result in less new building space than the proposed Master Plan and would avoid emissions associated with exterior building renovations, there would be less greenhouse gas emissions during construction and operation of Alternative 3. Therefore, greenhouse gas emissions impacts would remain less than significant, but would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Hazards and Hazardous Materials

As discussed in Section 4.10, Hazards and Hazardous Materials, a Cortese List database search revealed documentation of a closed leaking underground storage tank (LUST) case and a list of 21 operational underground storage tanks (USTs) present throughout the main campus. The exact location of the LUST and USTs are unknown; therefore, there is potential for construction activities to result in release of petroleum products to the environment, a potentially significant impact requiring MM-HAZ-1 to reduce the impact to less than significant. As with the proposed Master Plan, Alternative 3 would require implementation of MM-HAZ-1 to reduce impacts to less than significant. Impacts would be somewhat reduced compared to the proposed Master Plan (*less than significant with mitigation; lesser impact*).

As discussed in Section 4.10, the proposed Master Plan area is located in CAL FIRE-designated Fire Hazard Severity Zones including both Very High Fire Hazard Severity Zone (VHFHSZ) and High Fire Hazard Severity Zone (HFHSZ). Proposed Master Plan construction, demolition, and renovation projects along the northern and northwestern edges of the built portion of the main campus in the VHFHSZ could be subject to increased ignition potential resulting from construction equipment and related activities due to the proximity of native vegetation communities, a potentially significant impact. This impact would be reduced to less than significant with the implementation of MM-HAZ-2 and MM-HAZ-3. Given that Alternative 3 would result in less new building space than the proposed Master Plan and less construction overall, wildfire impacts would be reduced compared to the proposed Master Plan; however, the identified mitigation measures would be required to reduce impacts (*less than significant with mitigation; lesser impact*).

Hydrology and Water Quality

As discussed in Section 4.11, Hydrology and Water Quality, impacts of the proposed Master Plan would be less than significant through compliance with identified PDFs and regulatory requirements. Alternative 3 would result in less new impervious surface area and construction disturbance, compared to the proposed Master given that there would be a reduction of 100,000 GSF of new building space compared to the proposed Master Plan and avoidance of renovations involving changes to exterior building envelopes. Alternative 3 would also avoid some of the soil erosion associated with construction activities, due to the avoidance of historic building demolitions and certain exterior building renovations. Implementation of the PDFs combined with consistency with the NPDES permit and

the Cal Poly Pomona SWMP would ensure that potential water quality impacts would remain less than significant and reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

Land Use and Planning

As discussed in Section 4.12, Land Use and Planning, the proposed Master Plan ensures that campus growth is contained within its existing boundaries, avoiding expansion into areas that could potentially disrupt or physically divide adjacent communities. Similarly, Alternative 3 would only involve development within the campus boundaries and would not impact any established communities (*less than significant; same impact*).

Additionally, impacts of the proposed Master Plan related to conflicts with land use plans, policies, and regulations would be less than significant, as proposed development would be consistent with the proposed Master Plan, once adopted, and therefore would not conflict the adopted plans, policies and regulations set forth by the CSU Board of Trustees for the Cal Poly Pomona campus. Similarly, Alternative 3 would result in development under a refined proposed Master Plan with reduced GSF and would not conflict with such a refined plan, once adopted (*less than significant; same impact*).

Noise and Vibration

As discussed in Section 4.13, Noise and Vibration, construction of the proposed Master Plan could result in noise levels exceeding the FTA thresholds for on-campus sensitive receivers including those in the Library (Building 15) and residence halls (Buildings 54, 60, 61. 62. 63, 73, and 74), resulting in a potentially significant impact. Implementation of MM-NOI-1 would reduce this impact to less than significant. Although Alternative 3 would require less construction than the proposed Master Plan due to the reduction of 100,000 GSF of new building space and avoidance of certain building exterior renovations, there is still potential for construction activities within the distances shown in Section 4.12, Table 4.12-8 to result in significant noise impacts to sensitive receivers. Thus, Alternative 3 would require implementation of MM-NOI-1, which includes strategies to avoid substantial temporary increases in ambient noise levels during construction of buildings and infrastructure improvements. Although the potential for noise impacts would be reduced compared to the proposed Master Plan, Alternative 3 would still require implementation of MM-NOI-1 to reduce construction noise impacts to less than significant (*less than significant with mitigation; lesser impact*).

Additionally, the proposed Master Plan was determined to result in a potentially significant operational noise impact related to replacement of the Soccer Field and Kellogg Stadium, and construction of a new Softball Facility, which would facilitate new or expanded sporting events. Implementation of MM-NOI-2 would reduce this impact to less than significant. Alternative 3 would also include these projects and therefore operational noise impacts would be the same as the proposed Master Plan. Noise from these sporting events could exceed the operational noise threshold and therefore implementation of MM-NOI-2 would be required to avoid substantial increases in ambient noise levels during the hosting of large competitive matches. This would reduce operational noise impacts to less than significant, the same as the proposed Master Plan (*less than significant with mitigation; same impact*).

Population and Housing

As discussed in Section 4.14, Population and Housing, impacts of the proposed Master Plan would be less than significant regarding unplanned population growth and displacement of existing people or housing. As with the proposed Master Plan, Alternative 3 would also include 1,040 new beds from the Student Housing Replacement Project (Phase III) resulting in a total of 5,109 beds on campus (including existing beds and already approved but

not yet constructed projects). The changes proposed under Alternative 3 would not affect student population compared to the proposed Master Plan. Additionally, development under Alternative 3 would not result in the permanent removal of any housing on campus, nor would it result in the substantial displacement of people on the campus, the same as the proposed Master Plan. Impacts would remain less than significant (*less than significant; same impact*).

Public Services

As discussed in Section 4.15, Public Services, impacts of the proposed Master Plan would be less than significant related to the need for new or physically altered fire and police facilities, schools, parks, and other public facilities. The changes proposed under Alternative 3 would not affect demand for new or physically altered public services and facilities compared to the proposed Master Plan. Impacts would remain less than significant, the same as the proposed Master Plan (*less than significant; same impact*).

Recreation

As discussed in Section 4.16, Recreation, impacts of the proposed Master Plan would be less than significant related to deterioration of existing recreation facilities or the construction of new recreational facilities. The changes proposed under Alternative 3 would not affect demand for new or physically altered parks or recreational facilities compared to the proposed Master Plan. Impacts would remain less than significant, the same as the proposed Master Plan (*less than significant; same impact*).

Transportation

As discussed in Section 4.17, Transportation, impacts of the proposed Master Plan would be less than significant regarding conflicts with plans, ordinances, or policies addressing the circulation system; vehicle miles traveled; hazards due to geometric design features or incompatible uses; and emergency access. Given that Alternative 3 would not differ from the proposed Master Plan regarding transportation features or improvements, impacts would remain less than significant. Transportation impacts under Alternative 3 would remain the same as the proposed Master Plan (*less than significant; same impact*).

Tribal Cultural Resources

As discussed in Section 4.18, Tribal Cultural Resources, based on the general sensitivity of the area as the historic site of Native American tribal occupation, as well as an archival newspaper report indicating “sporadic” past discovery of TCRs during construction of one or more buildings, the unanticipated discovery of unknown TCRs during project construction is a possibility and the impact of the proposed Master Plan on such resources would be potentially significant. Implementation of MM-TRC-1, MM-TRC-2, and MM-TRC-3 would reduce this impact to less than significant. Under Alternative 3, there may be less ground disturbance due to less new building space and avoidance of construction activities associated with historic building demolitions and certain building exterior renovations. Nonetheless, Alternative 3 would still be required to implement all the above mitigation measures to reduce impacts associated with inadvertent discovery of TCRs. Therefore, impacts to TCRs would be less than significant after mitigation under Alternative 3, albeit reduced compared to the proposed Master Plan (*less than significant with mitigation; lesser impact*).

Utilities and Service Systems

As discussed in Section 4.19, Utilities and Service Systems, impacts of the proposed Master Plan would be less than significant regarding relocation or construction of new or expanded facilities for water, wastewater, stormwater, electric power, natural gas, and telecommunications; sufficient water supplies during normal, dry, and multiple dry years; wastewater treatment capacity; solid waste capacity; and compliance with solid waste regulations. Given that Alternative 3 would result in less new building space than the proposed Master Plan, there would be less demand for these utilities and service systems. Therefore, impacts under Alternative 3 would remain less than significant, but would be reduced compared to the proposed Master Plan (*less than significant; lesser impact*).

6.3.3.3 Ability to Meet Project Objectives

Development under Alternative 3 would renovate the Campus Center (Building 97) and Drama and Theatre (Building 25) rather than demolish and replace these buildings, which would reduce the total net increase of approximately 600,000 GSF of building space under the proposed Master Plan by approximately 100,000 GSF. Additionally, Alternative 3 would not achieve the proposed 155,000 GSF of space for both the Campus Center and the Interdisciplinary Academic Resources Building anticipated under the proposed Master Plan. The Campus Center replacement under the proposed Master Plan is intended to add study space, support student success, and to support projected demand for instructional space. The potential replacement of the Drama and Theatre building under the proposed Master Plan is intended to address years of deferred maintenance and to meet performance venue standards. Given that Alternative 3 would not include these replacement projects and would not include renovations to exterior building envelopes of historic buildings or historic contributors, Alternative 3 would not fully achieve the following objectives: accommodate enrollment growth to 30,000 FTES and associated physical development on the main campus (Objective 1); renovate or demolish any buildings that are inefficient in terms of operation, maintenance, or user comfort (Objective 2); replace any buildings with higher density, mixed-use buildings (Objective 3); and preserve space in the campus core for academic and student-focused uses (Objective 5).

Development under Alternative 3 would achieve the remaining project objectives to the same extent as the proposed Master Plan as it would: strengthen campus residential life by constructing new and replacement student housing (Objective 4); provide additional recreational space for I-Poly High School students (Objective 6); provide mobility enhancements for safe, sustainable, and accessible circulation (Objective 7); provide high-quality athletic facilities and optimize existing recreation fields (Objective 8); update infrastructure (Objective 9); or construct or renovate buildings to meet LEED certification requirements (Objective 10).

6.4 Comparison of Alternatives

A comparison between the proposed Master Plan and the alternatives' ability to meet project objectives is shown in Table 6-2 and a comparison of environmental impacts is shown in Table 6-3.

The CEQA Guidelines (Section 15126.6[a]) requires that an EIR's analysis of alternatives identify the "environmentally superior alternative" among all of those considered. In addition, Section 15126.6(e)(2) states that if the environmentally superior alternative is the No Project Alternative, the EIR must also identify an environmentally superior alternative among the other alternatives. Furthermore, Public Resources Code Sections 21002 and 21081 require lead agencies to adopt feasible mitigation measures or feasible alternatives in order to substantially lessen or avoid otherwise significant adverse environmental effects, unless specific economic, legal, social, technological, or other conditions make such mitigation measures or alternatives infeasible.

Alternative 3 (Reduced Development/Adaptive Reuse Alternative) would be the environmentally superior alternative because it would avoid the significant unavoidable impact to historic resources, and all other impacts would remain the same or be reduced compared to the proposed Master Plan. While Alternative 1 (No Project Alternative) would also avoid the significant unavoidable historic resources impacts, it would introduce a new significant unavoidable impact to agricultural resources and would result in more severe impacts on biological resources.

While Alternative 3 is the environmentally superior alternative, it does not fully meet the project objectives. In particular, Alternative 3 would not fully support the University's educational mission to accommodate student enrollment growth and associated physical development to support enrollment of 30,000 FTES (Objective 1). Such an increase in enrollment would provide expanded access to higher education in response to the increasing higher education needs and demands of a growing statewide population and would continue to allow Cal Poly Pomona to graduate students that can meet the needs of regional and statewide employers. Additionally, avoiding building demolition and designing and constructing all renovations in accordance with the Secretary's Standards under Alternative 3 may not be feasible in all instances and would need to be assessed on a project-by-project basis.

Table 6-2. Ability of Alternatives to Meet Project Objectives

Objective	Proposed Master Plan	Alternative 1: No Project	Alternative 2: Reduced Development /Historic Preservation	Alternative 3: Reduced Development /Adaptive Reuse
Objective 1: Support and advance Cal Poly Pomona's educational mission, as defined by the California Education Code, by guiding the physical development of the campus to accommodate enrollment growth to approximately 30,000 FTES and expanding the number of faculty and staff to support such enrollment growth, subject to funding.	Meets Objective	Does Not Meet Objective	Partially Meets Objective	Partially Meets Objective
Objective 2: Renovate or demolish buildings that are inefficient in terms of operation, maintenance, and user comfort due to age and critical deferred maintenance.	Meets Objective	Does Not Meet Objective	Partially Meets Objective	Partially Meets Objective
Objective 3: Replace demolished and temporary buildings with higher-density, mixed-use buildings that consolidate and integrate colleges and student support services.	Meets Objective	Does Not Meet Objective	Partially Meets Objective	Partially Meets Objective
Objective 4: Strengthen campus residential life by constructing new or replacement buildings to: ▪ Increase student housing capacity by approximately 1,040 net new beds to enhance student experience, support, wellness, success, and retention. ▪ Include a more diverse mix of housing types for students (freshman dormitories, pod configurations, suites, and apartments).	Meets Objective	Does Not Meet Objective	Meets Objective	Meets Objective

Table 6-2. Ability of Alternatives to Meet Project Objectives

Objective	Proposed Master Plan	Alternative 1: No Project	Alternative 2: Reduced Development /Historic Preservation	Alternative 3: Reduced Development /Adaptive Reuse
▪ Provide high-quality and affordable student housing options. ▪ Include common spaces, active outdoor spaces, and space for student support services within student housing.				
Objective 5: Preserve space in the campus core for academic uses and programming and for student-focused services.	Meets Objective	Does Not Meet Objective	Partially Meets Objective	Partially Meets Objective
Objective 6: Provide I-Poly High School students additional space to accommodate recreational activities, subject to the Los Angeles County Office of Education securing grant funds.	Meets Objective	Does Not Meet Objective	Meets Objective	Meets Objective
Objective 7: Provide mobility enhancements for safe, sustainable, and accessible circulation within and around the campus for pedestrians and bicyclists, to reduce reliance on vehicles and provide students, faculty/staff, and visitors with safe and easy access to public transit as an alternative to bringing a car to campus.	Meets Objective	Does Not Meet Objective	Meets Objective	Meets Objective
Objective 8: Provide high-quality athletic facilities and optimize existing recreational fields by utilizing land area and improving connections to and through the sports facilities.	Meets Objective	Does Not Meet Objective	Meets Objective	Meets Objective
Objective 9: Update infrastructure to provide safe and reliable utilities to the campus community.	Meets Objective	Not Applicable	Meets Objective	Meets Objective
Objective 10: Reduce reliance on fossil fuel consumption by expanding campus renewable energy production and by constructing and renovating buildings to meet Leadership in Energy and Environmental Design (LEED) certification requirements.	Meets Objective	Does Not Meet Objective	Meets Objective	Meets Objective

Table 6-3. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Master Plan	Alternative 1: No Project	Alternative 2: Reduced Development/ Historic Preservation	Alternative 3: Reduced Development/ Adaptive Reuse
Impact 4.1-1: The project would not conflict with applicable zoning and other regulations governing scenic quality.	LS	LS ↓	LS ↓	LS ↓
Impact 4.1-2: The project could create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	LSM	LS ↓	LSM	LSM ↓
Impact 4.2-1: The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.	LS	SU ↑	LS	LS
Impact 4.2-2: The project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.	LS	LS	LS	LS
Impact 4.2-3: The project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.	LS	SU ↑	LS	LS
Impact 4.3-1: The project would not conflict with or obstruct implementation of the applicable air quality plan.	LS	LS ↓	LS ↓	LS ↓
Impact 4.3-2: The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard.	LS	LS ↓	LS ↓	LS ↓
Impact 4.3-3: The project would not expose sensitive receptors to substantial pollutant concentrations.	LS	LS ↓	LS ↓	LS ↓
Impact 4.3-4: The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	LS	LS ↓	LS ↓	LS ↓
Impact 4.4-1: The project could have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-	LSM	PS ↑	LSM ↓	LSM ↓

Table 6-3. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Master Plan	Alternative 1: No Project	Alternative 2: Reduced Development/ Historic Preservation	Alternative 3: Reduced Development/ Adaptive Reuse
status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.				
Impact 4.4-2: The project could have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.	LSM	PS ↑	LSM ↓	LSM ↓
Impact 4.4-3: The project could have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	LSM	PS ↑	LSM ↓	LSM ↓
Impact 4.4-4: The project could interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	LSM	PS ↑	LSM ↓	LSM ↓
Impact 4.5-1: The project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section15064.5.	LSM	PS ↑	LSM ↓	LSM ↓
Impact 4.5-2: The project could disturb any human remains, including those interred outside of dedicated cemeteries.	LSM	PS ↑	LSM ↓	LSM ↓
Impact 4.6-1: The project could substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	SU	LS ↓	SU ↓	LSM ↓
Impact 4.7-1: The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	LS	LS ↓	LS ↓	LS ↓

Table 6-3. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Master Plan	Alternative 1: No Project	Alternative 2: Reduced Development/ Historic Preservation	Alternative 3: Reduced Development/ Adaptive Reuse
Impact 4.7-2: The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	LS	LS ↓	LS ↓	LS ↓
Impact 4.8-1: The project would not directly or indirectly cause potential adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking and seismic-related ground failure (including liquefaction and landslides).	LS	LS	LS	LS
Impact 4.8-2: The project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and would not potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.	LS	LS	LS	LS
Impact 4.8-3: The project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994) and therefore would not create substantial direct or indirect risks to life or property.	LS	LS	LS	LS
Impact 4.8-4: The project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	LSM	PS ↑	LSM ↓	LSM ↓
Impact 4.9-1: The project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	LS	LS ↓	LS ↓	LS ↓
Impact 4.9-2: The project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	LS	LS ↓	LS ↓	LS ↓
Impact 4.10-1: The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	LS	LS ↓	LS ↓	LS ↓

Table 6-3. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Master Plan	Alternative 1: No Project	Alternative 2: Reduced Development/ Historic Preservation	Alternative 3: Reduced Development/ Adaptive Reuse
Impact 4.10-2: The project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, including due to the project being located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.	LSM	PS ↑	LSM ↓	LSM ↓
Impact 4.10-3: The project could emit hazardous emissions or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	LSM	PS ↑	LSM ↓	LSM ↓
Impact 4.10-4: The project would not result in a safety hazard or excessive noise associated with airport noise for people residing or working in the project area.	LS	LS	LS	LS
Impact 4.10-5: The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	LS	LS	LS	LS
Impact 4.10-6: The project could (1) expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, or (2) exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, due to slope, prevailing winds, and other factors.	LSM	PS ↑	LSM ↓	LSM ↓
Impact 4.10-7: The project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	LS	LS ↓	LS ↓	LS ↓
Impact 4.10-8: The project would not expose people or structures to significant risks, including downslope or	LS	LS ↓	LS ↓	LS ↓

Table 6-3. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Master Plan	Alternative 1: No Project	Alternative 2: Reduced Development/ Historic Preservation	Alternative 3: Reduced Development/ Adaptive Reuse
downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.				
Impact 4.11-1: The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	LS	LS ↓	LS ↓	LS ↓
Impact 4.11-2: The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	LS	LS ↓	LS ↓	LS ↓
Impact 4.11-3: The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would (i) result in substantial erosion or siltation on or off site, (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site, or (iii) increase or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.	LS	LS ↓	LS ↓	LS ↓
Impact 4.11-4: The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	LS	LS ↓	LS ↓	LS ↓
Impact 4.12-1: The project would not physically divide an established community	LS	LS	LS	LS
Impact 4.12-2: The project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	LS	LS	LS	LS

Table 6-3. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Master Plan	Alternative 1: No Project	Alternative 2: Reduced Development/ Historic Preservation	Alternative 3: Reduced Development/ Adaptive Reuse
Impact 4.13-1: The project could result in generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; however, the project would not result in a substantial permanent increase in ambient noise levels.	LSM	LS ↓	LSM ↓	LSM ↓
Impact 4.13-2: The project would not result in generation of excessive groundborne vibration or groundborne noise levels.	LS	LS ↓	LS ↓	LS ↓
Impact 4.14-1: The project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	LS	LS ↓	LS	LS
Impact 4.14-2: The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	LS	LS	LS	LS
Impact 4.15-1: The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services.	LS	LS ↓	LS	LS
Impact 4.16-1: The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Additionally, the project would not include recreational	LS	LS ↓	LS	LS

Table 6-3. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Master Plan	Alternative 1: No Project	Alternative 2: Reduced Development/ Historic Preservation	Alternative 3: Reduced Development/ Adaptive Reuse
facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.				
Impact 4.17-1: The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	LS	LS ↓	LS	LS
Impact 4.17-2: The project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).	LS	LS ↓	LS	LS
Impact 4.17-3: The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	LS	LS ↓	LS	LS
Impact 4.17-4: The project would not result in inadequate emergency access.	LS	LS ↓	LS	LS
Impact 4.18-1: The project could cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or as determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1.	LSM	PS ↑	LSM ↓	LSM ↓

Table 6-3. Comparison of Impacts from the Alternatives

Environmental Issue	Proposed Master Plan	Alternative 1: No Project	Alternative 2: Reduced Development/ Historic Preservation	Alternative 3: Reduced Development/ Adaptive Reuse
Impact 4.19-1: The project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	LS	LS ↓	LS ↓	LS ↓
Impact 4.19-2: The project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.	LS	LS ↓	LS ↓	LS ↓
Impact 4.19-3: The project would not result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	LS	LS ↓	LS ↓	LS ↓
Impact 4.19-4: The project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	LS	LS ↓	LS ↓	LS ↓
Impact 4.19-5: The project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste	LS	LS ↓	LS ↓	LS ↓

Notes: NI = no impact; LS = less than significant; LSM = less than significant with mitigation; PS = potentially significant; SU = significant unavoidable; ↑ = greater; ↓ = lesser.

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