CAL POLY POMONA
CAMPUS MASTER PLAN

Cal Poly Pomona

Findings of Fact and Statement of Overriding Considerations

DUDEK

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Cal Poly Pomona Campus Master Plan

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1 Introduction

1.1 Purpose

This statement of Findings of Fact (Findings) addresses the environmental effects associated with the proposed California State Polytechnic University Pomona (Cal Poly Pomona) Campus Master Plan (proposed Master Plan). These Findings are made pursuant to the California Environmental Quality Act (CEQA) under Sections 21081, 21081.5, and 21081.6 of the Public Resources Code and Sections 15091 and 15093 of the CEQA Guidelines, Title 14, Cal. Code Regs. 15000, et seq. The potentially significant impacts were identified in both the Draft Environmental Impact Report (EIR) and the Final EIR, as well as additional facts found in the complete record of proceedings.

Public Resources Code 21081 and Section 15091 of the CEQA Guidelines require that the lead agency prepare written findings for identified significant impacts, accompanied by a brief explanation for the rationale for each finding. The California State University (CSU) Board of Trustees is the lead agency responsible for preparation of the EIR in compliance with CEQA and the CEQA Guidelines. Section 15091 of the CEQA Guidelines states, in part, that:

> (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
>
> (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
>
> (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
>
> (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

In accordance with Public Resource Code 21081 and Section 15093 of the CEQA Guidelines, whenever significant impacts cannot be mitigated to below a level of significance, the decision-making agency is required to balance, as applicable, the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse effects may be considered "acceptable." In that case, the decision-making agency may prepare and adopt a Statement of Overriding Considerations, pursuant to the CEQA Guidelines.

Section 15093 of the CEQA Guidelines state that:

> (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

The Final EIR for the proposed Master Plan identified potentially significant effects that could result from implementation. However, the CSU Board of Trustees finds that the inclusion of certain mitigation measures as part of the project approval will reduce most, but not all, of those effects to less than significant levels. Those impacts that are not reduced to less than significant levels are identified and overridden due to specific proposed Master Plan benefits in a Statement of Overriding Considerations.

In accordance with CEQA and the CEQA Guidelines, the Board of Trustees adopts these findings as part of its certification of the Final EIR for the proposed Master Plan. Pursuant to Section 21082.1(c)(3) of the Public Resources Code, the Board of Trustees also finds that the Final EIR reflects the Board's independent judgment as the lead agency for the proposed Master Plan. As required by CEQA, the Board of Trustees, in adopting these findings, also adopts a Mitigation Monitoring and Reporting Program for the proposed Master Plan. The Board of Trustees finds that the Mitigation Monitoring and Reporting Program, which is incorporated by reference and made a part of these findings, meets the requirements of Section 21081.6 of the Public Resources Code by providing for the implementation and monitoring of measures intended to mitigate potentially significant effects of the proposed Master Plan.

1.2 Organization and Format of Findings

Section 1.0, Introduction, contains a summary description of the proposed Master Plan and background facts relative to the environmental review process.

Section 2.0 discusses the CEQA findings of independent judgment. Section 2.1 identifies the environmental effects determined not to be significant during the Notice of Preparation (NOP) scoping process and therefore were not discussed in the EIR. Section 2.2 identifies the environmental effects of the project determined to have a less than significant impact. Section 2.3 identifies the potentially significant effects of the project that would be mitigated to a less than significant level with implementation of the identified mitigation measures. Section 2.4 of these Findings identifies the significant impacts of the project that cannot be mitigated to a less than significant level, even though all feasible mitigation measures have been identified and incorporated into the project.

Section 3.0 identifies the feasibility of the project Alternatives that were studied in the EIR.

Section 4.0 discusses findings with respect to mitigation of significant adverse impacts, and adoption of the Mitigation Monitoring and Reporting Program.

Section 5.0 describes the certification of the Final EIR.

Section 6.0 contains the Statement of Overriding Considerations providing the Board of Trustees' views on the balance between the proposed Master Plan's significant environmental effects and the merits and objectives of the proposed Master Plan.

1.3 Summary of Project Description

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 full time equivalent student (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 gross square feet (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 6.5 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.

1.4 Project Objectives

CEQA states that the statement of project objectives should be clearly written and define the underlying purpose of the project, in order to permit the development of a reasonable range of alternatives and aid the Lead Agency in making findings. The project objectives also aid decision makers in preparing findings and a statement of overriding considerations, if necessary. The statement of objectives should also include the underlying purpose of the proposed project.

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 Master Plan:

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.

1.5 Environmental Review Process

1.5.1 Notice of Preparation

In accordance with the requirements of CEQA and the CEQA Guidelines, to determine the number, scope and extent of environmental issues, the NOP of the Draft EIR was circulated for public review for a period of 30 days, beginning on April 8, 2024, and ending on May 8, 2024. The Board of Trustees held a public scoping meeting on April 24, 2024, to present an overview of the proposed Master Plan and to solicit public input regarding the proposed scope and content of the Draft EIR.

1.5.2 Draft Environmental Impact Report

In accordance with the requirements of CEQA and the CEQA Guidelines, a Draft EIR was prepared to address the potential significant environmental effects associated with the proposed Master Plan identified during the NOP process. Based on the NOP scoping process, the EIR addressed the following environmental 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

The Draft EIR was made available to the public for review and comment for a 45-day period. The review and comment period began on May 7, 2025, and concluded on June 20, 2025.

The Draft EIR was accessible online at https://www.cpp.edu/masterplan. Copies of the Draft EIR were available for public review at the following location during normal business hours:

- Cal Poly Pomona University Library, 3801 West Temple Avenue, Pomona, California 91768
- Cal Poly Pomona Facilities Planning & Management, 3801 West Temple Avenue, Pomona, California 91768

A virtual Public Information Meeting was held on May 13, 2025, to give the public an opportunity to learn more about the proposed Master Plan and Draft EIR.

During the Draft EIR public review period, four comment letters were received. All comment letters received in response to the Draft EIR were reviewed and are included in the Final EIR, along with written responses to each of the comments.

1.5.3 Final Environmental Impact Report

Section 15088 of the CEQA Guidelines requires that the Lead Agency responsible for the preparation of an EIR evaluate comments on environmental issues and prepare a written response addressing each of the comments. The intent of the Final EIR is to provide a forum to address comments pertaining to the information and analysis contained within the Draft EIR, and to provide an opportunity for clarifications, corrections, or minor revisions to the Draft EIR as needed.

The Final EIR assembles in one document all the environmental information and analysis prepared for the proposed Master Plan, including comments on the Draft EIR and responses by the CSU to those comments.

In accordance with CEQA Guidelines Section 15132, the Final EIR for the proposed Master Plan consists of: (i) the Draft EIR and subsequent revisions; (ii) comments received on the Draft EIR; (iii) a list of the persons, organizations, and public agencies commenting on the Draft EIR; (iv) written responses to significant environmental issues raised during the public review and comment period and related supporting materials; and, (v) other information contained in the EIR, including EIR appendices.

2 California Environmental Quality Act Findings of Independent Judgment

2.1 Environmental Effects Determined Not to Be Significant in the Notice of Preparation Scoping Process and Not Discussed in the Environmental Impact Report

Section 15128 of the CEQA Guidelines requires an EIR to contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were, therefore, not discussed in detail in the EIR. Based on the NOP process, implementation of the proposed Master Plan was determined to result in either no impact, or a less than significant impact without the implementation of mitigation measures on the following resources, and were therefore, not discussed in detail in the EIR:

- Mineral Resources

2.2 Less than Significant Impacts

The Board of Trustees finds that, based upon substantial evidence in the record, including information in the Final EIR, the following impacts have been determined be less than significant and no mitigation is required pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a):

2.2.1 Aesthetics

Less than Significant Impacts

The proposed Master Plan's aesthetics impacts are analyzed in Section 4.1 of the Final 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. 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.

The proposed Master Plan is not located within the viewshed of a state scenic highway. 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.

Construction activities would result in temporary visual changes visible from public vantage points but would not conflict with regulations governing scenic quality. These changes are short-term and would not be present following completion of construction. Upon buildout, new development would be similar in scale, massing, height, and character to existing development. New construction would be subject to the CSU schematic design review process, ensuring appropriateness of design and quality. 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.

Cumulative projects would be located in already developed areas with similar uses and would comply with applicable state and local standards and regulations. As such, the direct and cumulative impacts related to conflict with applicable zoning and other regulations governing scenic quality, as provided in the CEQA Appendix G thresholds, would not be considered a significant impact on the environment.

As such, any project-level and cumulative aesthetics impact potentially resulting from the project, including (i) effects to existing scenic views or scenic vistas; (ii) damage to scenic resources within a state highway; (iii) conflicts with applicable zoning and other regulations governing scenic quality, as provided in the CEQA Appendix G thresholds, would not be considered a significant impact on the environment.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to conflict with applicable zoning and other regulations governing scenic quality would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.1, Aesthetics

2.2.2 Agriculture and Forestry Resources

Less than Significant Impacts

The proposed Master Plan's agriculture and forestry resources impacts are analyzed in Section 4.2 of the Final EIR. 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 2024a). As such, implementation of the proposed Master Plan would have no impact on existing zoning for forest land, timberland, or timberland zoned timberland production.

The proposed Master Plan area predominantly 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.

The proposed Master Plan area contains Important Farmland in Los Angeles County that is zoned for agricultural uses. 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.

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 2024a). 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 2024b). 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, 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.

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). 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.

The proposed Master Plan would have less than significant impacts on agricultural or forestry resources, including (i) the conversion of farmland to non-agricultural use, (ii) conflict with existing zoning for agricultural use or a Williamson Act contract, (iii) other changes in the existing environment that, 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, or (iv) a cumulatively considerable contribution to significant cumulative impacts related to agricultural resources.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to agriculture and forestry resources would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.2, Agriculture and Forestry Resources

2.2.3 Air Quality

Less than Significant Impacts

The proposed Master Plan's air quality impacts are analyzed in Section 4.3 of the Final EIR. The determination that impacts to air quality would be less than significant is based on a thorough assessment of various factors. The proposed Master Plan is located within the South Coast Air Basin under the jurisdiction of the South Coast Air Quality Management District (SCAQMD), which is the local agency responsible for administration and enforcement of air quality regulations for the area. Emissions resulting from proposed Master Plan construction alone would not exceed the criteria pollutant thresholds established by the SCAQMD for all criteria air pollutants (i.e., volatile organic compounds [VOC], oxides of nitrogen [NO_x], carbon monoxide [CO], sulfur oxides, coarse particulate matter [PM_{10}], and fine particulate matter [$PM_{2.5}$]). 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. Additionally, the proposed Master Plan growth is accommodated by the growth forecast in SCAQMD's 2022 Air Quality Master Plan. Therefore, the proposed Master Plan would not conflict with the SCAQMD CEQA Air Quality Handbook, and impacts would be less than significant.

The 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). 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. Based on these calculations, 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.

A localized significance threshold analysis was prepared to determine potential impacts to nearby sensitive receptors during proposed Master Plan construction. Although construction activities would result in temporary sources of on-site fugitive dust and construction equipment emissions, construction activities would not generate emissions in excess of site-specific localized significance thresholds. Because Master Plan 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 toxic air contaminants (TACs). Due to the relatively short period of exposure at any individual sensitive receptor and minimal particulate emissions generated, TACs emitted during construction of Master Plan projects would not be expected to result in concentrations causing significant health risks. 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, project design feature (PDF) AQ-2, would require that this emergency generator under the proposed Master Plan would be compliant with California Air Resources Board'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. Therefore, the proposed Master Plan would not result in exposure of sensitive receptors to substantial TAC concentrations during long-term operations. 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, a CO hotspot is not anticipated to occur. Therefore, impacts to sensitive receptors would be less than significant.

Odors would be potentially generated from vehicles and equipment exhaust emissions, use of landscaping or maintenance equipment, and temporary storage of solid waste. Such odors would disperse rapidly from the Master Plan project sites and generally occur at magnitudes that would not affect a substantial number of people.

The proposed Master Plan would have less than significant impacts on air quality, including (i) conflict with implementation of the applicable air quality plan, (ii) 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, (iii) exposure of sensitive receptors to substantial pollutant concentrations, (iv) other emissions adversely affecting a substantial number of people, or (v) a cumulatively considerable contribution to significant cumulative impacts related to air quality.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to air quality would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.3, Air Quality, and Appendix B, Air Quality, Greenhouse Gas, and Energy Model Outputs (air quality model outputs)

2.2.4 Biological Resources

Less than Significant Impacts

The proposed Master Plan's biological resources impacts are analyzed in Section 4.4 of the Final EIR. 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.

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 2019). Therefore, the proposed Master Plan would not conflict with any provisions of adopted HCPs, NCCPs, or other approved local, regional, or state HCPs.

Cumulative impacts were determined to be 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 with implementation of mitigation measures (detailed under Section 2.3 of this document). The proposed Master Plan would not require any mitigation measures beyond those proposed to reduce project-level impacts to less than significant. Thus, the project's impacts on biological resources, arising from (i) conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or (ii) conflicts with provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP would be less than significant, and no additional mitigation measures would be required.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential cumulative impacts related to biological resources would be less than significant, and no mitigation measures are required beyond those proposed to address project-level impacts.

Reference

EIR Section 4.4, Biological Resources, and Appendix C, Biological Resources Potential to Occur Tables

2.2.5 Cultural Resources – Archaeological Resources (Cumulative Impacts)

Less than Significant Impacts

The proposed Master Plan's archaeological resources impacts are analyzed in Section 4.5 of the Final EIR. Cumulative impacts were determined to be less than significant because project-specific mitigation combined with the mandatory evaluation of potential impacts resulting from other nearby related projects would ensure that there would be no cumulatively considerable impacts to significant archaeological resources. The proposed Master Plan would not require any mitigation measures beyond those proposed to reduce project-level impacts to less than significant.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential cumulative impacts related to archaeological resources would be less than significant, and no mitigation measures are required beyond those proposed to address project-level impacts.

Reference

EIR Section 4.5, Cultural Resources – Archaeological Resources, and Appendix D-1, Archaeological Resources Inventory Report

2.2.6 Cultural Resources – Historical Resources (Cumulative Impacts)

Less than Significant Impacts

The proposed Master Plan's historical resources impacts are analyzed in Section 4.6 of the Final EIR. The Master Plan's incremental contribution to cumulative impacts on historical resources was determined to be less than cumulatively considerable because other cumulative projects in the vicinity of the Master Plan area do not adversely affect related historical resources, which, considered together with the historical resources identified in the Master Plan EIR, would result in cumulatively significant impacts on historical resources.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential cumulative impacts related to historical resources would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.5, Cultural Resources – Historical Resources, and Appendix D-2, Historical Resources Technical Report

2.2.7 Energy

Less than Significant Impacts

The proposed Master Plan's energy impacts are analyzed in Section 4.7 of the Final EIR. 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 used for construction activities would be temporary and would have a negligible contribution to the proposed Master Plan's overall energy consumption. Proposed Master Plan operations would require electricity for multiple purposes including building heating and cooling, lighting, appliances, electronics, and water and wastewater conveyance. 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, and would meet or exceed the minimum requirements equivalent to Leadership in Energy and Environmental Design (LEED) Silver. Natural gas is not anticipated to be required during construction of the proposed Master Plan, but would be required during operation for various purposes such as building heating. 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. Regarding petroleum, 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 proposed Master Plan would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. 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. The proposed Master Plan would comply with all applicable regulatory requirements including Title 24 of the California Code of Regulations (CCR), which contains energy efficiency standards for residential and nonresidential buildings based on a state mandate to reduce California's energy demand. Cal Poly Pomona would also comply with the CSU Sustainability Policy, which would reduce energy use.

Cumulative projects would be required by Los Angeles County or the City of Pomona, as applicable, to conform to current federal, state, and local energy conservation standards; 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.

Based on the foregoing, the proposed Master Plan (i) would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation, (ii) would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and (iii) would not result in a cumulatively considerable contribution to significant cumulative impacts related to energy.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, potential impacts related to energy would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.7, Energy, and Appendix B, Air Quality, Greenhouse Gas, and Energy Model Outputs,

2.2.8 Geology and Paleontology

Less than Significant Impacts

The proposed Master Plan's geology and paleontology impacts are analyzed in Section 4.8 of the Final EIR. Several major Holocene-active earthquake fault zones are located within the general region, but 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. The San Jose Fault, classified by the California Geological Survey (CGS) as a late Quaternary fault, does intersect the proposed Master Plan area and has been the subject of previous geotechnical investigations, but is not considered an Alquist-Priolo Earthquake fault. 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 construction that would occur with the proposed Master Plan would be done in accordance with CSU Seismic Requirements and California Building Code (CBC) requirements. The CBC contains standards and regulations relating to seismic safety and construction standards for building foundations. Section 1803 of the CBC 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. Conformance with the CBC, as required by state law, would minimize the potential for impacts related to fault rupture and seismic ground shaking.

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 (OES 2024). 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. 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. 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.

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). 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.

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.

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.

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.

Through compliance with regulatory requirements related to geology, the proposed Master Plan would not have a considerable contribution to any potentially significant cumulative impact related to geology.

Based on the foregoing, the proposed Master Plan would not (i) directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking or seismic-related ground failure; (ii) 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, (iii) be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), (iv) have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater, or (v) result in a cumulatively considerable contribution to significant cumulative impacts related to geology or paleontology.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, potential impacts related to geology and paleontology would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.8, Geology and Paleontology

2.2.9 Greenhouse Gas Emissions

Less than Significant Impacts

The proposed Master Plan's greenhouse gas (GHG) emissions impacts are analyzed in Section 4.9 of the Final EIR. The campus-specific mass emissions threshold of 1,164 metric tons of carbon dioxide equivalent 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 Section 4.9 of the Final EIR, the proposed Master Plan would not result in the exceedance of the campus-specific mass emission threshold. The proposed Master Plan would also be consistent with the CSU Sustainability Policy, the Cal Poly Campus Climate Action Plan, the Connect SoCal 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), California Air Resources Board's 2022 Scoping Plan, Assembly Bill 1279, and Executive Order B-55-18. Based on the foregoing, the proposed Master Plan would not (i) generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, (ii) conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, or (iii) result in a cumulatively considerable contribution to significant cumulative impacts related to GHG emissions.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, potential impacts related to GHG emissions would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.9, Greenhouse Gas Emissions, and Appendix B, Air Quality, Greenhouse Gas, and Energy Model Outputs

2.2.10 Hazards and Hazardous Materials

Less than Significant Impacts

The proposed Master Plan's hazards and hazardous materials impacts are analyzed in Section 4.10 of the Final EIR. Use, transport, and disposal of hazardous materials is subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public. 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. 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. Building renovation and demolition activities that involve the potential for asbestos-containing materials, lead-based paint, and universal wastes would be completed in accordance with applicable federal and state regulations. Additionally, CSU policy provides procedures required to be used during planning, design and construction of buildings and other facilities on CSU campuses, including preparation of a hazardous materials report.

A portion of the main campus overlaps the airport influence area of the Brackett Field Airport. The area of overlap is for Federal Aviation Administration (FAA) notification criteria under 14 Code of Federal Regulations(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.

Additionally, the proposed Master Plan would not impair implementation of or physically interfere with the Cal Poly Pomona Emergency Operations Plan (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.

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 very high fire hazard severity zone (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 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, are expected to exacerbate wildfire risk or result in additional temporary or permanent impacts beyond those identified in this EIR.

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, 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.

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.

Based on the foregoing, the proposed Master Plan would not (i) create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, (ii) result in a safety hazard or excessive noise associated with airport noise for people residing or working in the project area, (iii) impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, (iv) require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment, (v) 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, or (vi) result in a cumulatively considerable contribution to significant cumulative impacts related to hazards and hazardous materials.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the above potential impacts related to hazards and hazardous materials would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.10, Hazards and Hazardous Materials

2.2.11 Hydrology and Water Quality

Less than Significant Impacts

The proposed Master Plan's hydrology and water quality impacts are analyzed in Section 4.11 of the Final EIR. The proposed Master Plan could potentially violate water quality standards, if not designed and managed appropriately. However, the proposed Master Plan would implement PDFs and would comply with the National Pollutant Discharge Elimination System (NPDES) Phase II MS4 permit and the Cal Poly Pomona Storm Water Master Plan. 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.

The campus is located within the Spadra Basin, a non-adjudicated groundwater subbasin of the San Gabriel Valley Basin. The Groundwater Sustainability Program for the Spadra Basin 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. The proposed Master Plan could also potentially result in increases in

impervious surfaces, which could reduce groundwater recharge. However, the proposed Master Plan projects would be subject to the drainage control requirements, which would include design features that encourage on-site infiltration as required by PDF-HWQ-3.

The proposed Master Plan would result in changes to drainage patterns when compared to the existing condition. However, the proposed Master Plan would be subject to the same drainage control requirements, 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.

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 Waste Discharge Requirements (WDRs) for all surface water discharges, including stormwater. 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.

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, 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.

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 would be required to obtain coverage under the NPDES Construction General Permit, 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.

Based on the foregoing, the proposed Master Plan would not (i) violate any water quality standards or WDRs or otherwise substantially degrade surface or ground water quality, (ii) substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin, (iii) substantially alter the existing drainage pattern of the site or area, (iv) risk release of pollutants due to project inundation, (v) conflict with or obstruct implementation of a water quality control plan or

sustainable groundwater management plan, or (vi) result in a cumulatively considerable contribution to significant cumulative impacts related to hydrology and water quality.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to hydrology and water quality would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.11, Hydrology and Water Quality, and Appendix G, Water Supply Evaluation

2.2.12 Land Use and Planning

Less than Significant Impacts

The proposed Master Plan's land use and planning impacts are analyzed in Section 4.12 of the Final EIR. 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. Moreover, the proposed Master Plan would include a comprehensive series of mobility and circulation improvements aimed at enhancing campus connectivity. The plan specifically avoids creating infrastructure that would sever connections to surrounding areas.

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. Although Cal Poly Pomona is exempt from local land use plans, policies, and regulations, the proposed Master Plan 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. 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 with adopted plans, policies and regulations set forth by the CSU Board of Trustees for the Cal Poly Pomona campus.

Additionally, given that the proposed Master Plan would not physically divide an established community and would not result in conflicts with the proposed Master Plan, it would not contribute to cumulatively significant land use impacts from cumulative development. 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.

Based on the foregoing, the proposed Master Plan would not (i) physically divide an established community, (ii) 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, or (iii) result in a cumulatively significant impact related to land use and planning.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to land use and planning would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.12, Land Use and Planning

2.2.13 Noise and Vibration

Less than Significant Impacts

The proposed Master Plan's noise impacts are analyzed in Section 4.13 of the Final EIR. Groundborne vibration levels associated with proposed Master Plan construction were calculated using vibration velocities for typical construction equipment. 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 Federal Transit Administration (FTA) and the California Department of Transportation 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. It was determined that levels for anticipated construction equipment would attenuate to less than 0.2 ips PPV within approximately 26 feet from the equipment. At a distance of 40 feet, groundborne vibration levels for anticipated construction equipment would attenuate to less than 0.1 ips PPV. 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.

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 A-weighted decibels (dBA) Community Noise Equivalent Level (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.

Development of one or more off-campus cumulative projects concurrent with implementation of the proposed Master Plan, 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.

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.

Based on the foregoing, the proposed Master Plan would not (i) result in generation of excessive groundborne vibration or groundborne noise levels, (ii) expose people to excessive noise levels associated with an airport, or (iii) result in a cumulatively considerable contribution to significant cumulative impacts related to noise and vibration.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to noise and vibration would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.13, Noise and Vibration, and Appendix E, Noise Measurements and Calculations

2.2.14 Population and Housing

Less than Significant Impacts

The proposed Master Plan's population and housing impacts are analyzed in Section 4.14 of the Final EIR. 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. 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 Southern California Association of Governments' Connect SoCal and the region's efforts to achieve regional housing needs assessment 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. 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. Proposed construction and renovation would be accommodated by existing utility connections and planned improvements.

Based on the foregoing, the proposed Master Plan would not (i) induce substantial unplanned population growth in an area, (ii) displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, or (iii) result in a cumulatively considerable contribution to significant cumulative impacts related to population and housing.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to population and housing would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.14, Population and Housing

2.2.15 Public Services

Less than Significant Impacts

The proposed Master Plan's public services impacts are analyzed in Section 4.15 of the Final EIR. The proposed Master Plan is expected to increase the campus population by approximately 8,085 students and 879 staff and faculty by 2040, with on-campus housing increasing by 1,040 beds. This growth is not considered substantial unplanned population growth and would not necessitate new or expanded fire protection facilities. Fire Station 187, located less than a mile from the campus, will continue to provide fire protection services, as the Master Plan does not expand the campus boundaries. The plan includes compliance with California Building, Fire, and Health and Safety Codes, ensuring that new buildings are equipped with necessary fire safety measures. The anticipated increase in students, faculty, and staff living off-campus due to the proposed Master Plan at Cal Poly Pomona is expected to be accommodated by existing housing units and new units constructed by third parties. Predicting the exact extent and location of future housing patterns is speculative. If the increased population resides in existing units, there would be no significant impact on fire services, and no need for new or altered fire protection facilities. For new housing developments, fire protection service fees are included in building permits, addressing any increased demand for public services. Future housing construction will undergo environmental review under CEQA, assessing the need for fire protection facilities and ensuring compliance with regulatory requirements. Consequently, the demand for fire protection services is expected to remain manageable, and no significant impact on fire protection facilities is anticipated.

The University Police Department at Cal Poly Pomona, supported by mutual aid agreements with local law enforcement agencies, provides campus law enforcement services. The proposed Master Plan could incrementally increase the demand for these services due to campus growth. A University Police satellite station is planned as part of the Bronco Mobility Hub project to accommodate this growth, with impacts evaluated in the EIR. For off-campus populations, existing housing units and new units constructed by third parties will accommodate the increase. Predicting future housing patterns is speculative, but existing units will not increase police service demand. New housing developments will include fees for police services, addressing any increased demand. Additionally, future housing construction will undergo environmental review under CEQA, assessing the need for police facilities.

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. However, 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. 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.

Additionally, 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. 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.

It is anticipated that most students, faculty, and staff would primarily utilize the University 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.

Based on the foregoing, the proposed Master Plan would not (i) 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, or (ii) result in a cumulatively considerable contribution to significant cumulative impacts related to public services.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to public services would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.15, Public Services

2.2.16 Recreation

Less than Significant Impacts

The proposed Master Plan's recreation impacts are analyzed in Section 4.16 of the Final EIR. 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. 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.

Based on the foregoing, the proposed Master Plan would not (i) 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, or include recreational facilities or require the construction or expansion of recreational facilities, or (ii) result in a cumulatively considerable contribution to significant cumulative impacts related to recreation.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to recreation would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.16, Recreation

2.2.17 Transportation

Less than Significant Impacts

The proposed Master Plan's transportation impacts are analyzed in Section 4.17 of the Final EIR. Proposed Master Plan development would be confined to the campus and would not conflict with plans, ordinances, or policies addressing the circulation system. Planned mobility and circulation improvements would improve campus connectivity to Foothill Transit and would not conflict with the existing transit facilities. Improvements to pedestrian/bicycle facilities 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 is also adopting a Traffic Demand Management (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.

A project-level vehicle miles traveled (VMT) assessment under proposed Master Plan buildout conditions was prepared. The proposed Master Plan would generate VMT per service population at a level below the applicable thresholds, as shown in Table 4.17-8 of the Final EIR.

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 CSU standard construction BMPs 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 would be reviewed by the CSU Office of Fire Safety prior to implementation. With adherence to existing standards and requirements, emergency access would be maintained during all construction activities associated with development under the proposed Master Plan. During operation, 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.

A cumulative-level VMT assessment was prepared to analyze the proposed Master Plan's effect on VMT within the regional San Gabriel Valley Council of Governments (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.

Based on the foregoing, the proposed Master Plan would not (i) conflict with a program, plan, ordinance, or policy addressing the circulation system, (ii) conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), (iii) substantially increase hazards due to a geometric design feature or incompatible uses, (iv) result in inadequate emergency access, or (v) result in a cumulatively considerable contribution to significant cumulative impacts related to transportation

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to transportation would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.17, Transportation, and Appendix F, Model Plots and VMT Calculations

2.2.18 Tribal Cultural Resources (Cumulative Impacts)

Less than Significant Impacts

The proposed Master Plan's tribal cultural resources impacts are analyzed in Section 4.18 of the Final EIR. Cumulative impacts were determined to be less than significant because 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. The proposed Master Plan would not require any mitigation measures beyond those proposed to reduce project-level impacts to less than significant.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential cumulative impacts related to tribal cultural resources would be less than significant, and no mitigation measures are required beyond those proposed to address project-level impacts.

Reference

EIR Section 4.18, Tribal Cultural Resources

2.2.19 Utilities and Service Systems

Less than Significant Impacts

The proposed Master Plan's utilities and service systems impacts are analyzed in Section 4.19 of the Final EIR. While the proposed Master Plan would require the construction of water improvements, 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 the EIR. Wastewater generated by the proposed Master Plan would be treated at the A.K. Warren Water Resource Facility located in the City of Carson or the San Jose Creek Water Reclamation Plant located adjacent to the City of Industry, both of which have capacity to accommodate the proposed Master Plan's wastewater generation. 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 the EIR. 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. 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. 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.

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 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. 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). Cal Poly Pomona has been using recycled water for crop irrigation and landscaping since 1965 (Cal Poly Pomona 2025). An estimated 97% of the campus is

irrigated with the use of recycled water (Cal Poly Pomona 2025). Cal Poly Pomona provides the neighboring Forest Lawn cemetery with recycled water under certain conditions based on an agreement from 1982. This water is supplied by the City of Pomona. Cal Poly Pomona estimates that the current water use on a typical school day is 489,000 gallons per day (gpd) or 548 acre-feet per year (AFY), which would increase with the proposed Master Plan (Cal Poly Pomona 2024a). Total water use for Cal Poly Pomona after buildout of the proposed Master Plan would be approximately 639,243 gpd or 717 AFY. Based on the water supply and demand estimates as provided in the water supply evaluation 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.

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. Master Plan operation would result in the net increase in solid waste generation of approximately 2,672 tons per year at buildout, which can be accommodated by the three landfills used by the West Valley Materials Recovery Facility transfer station, which have a combined capacity of 180,202,960 cubic yards. In addition, solid waste generated from operation of the proposed Master Plan would be subject to the existing on-campus solid waste diversion program.

Based on the foregoing, the proposed Master Plan would (i) not require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, (ii) have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years, (iii) 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, (iv) 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, (v) comply with federal, state, and local management and reduction statutes and regulations related to solid waste, and (vi) not result in a cumulatively considerable contribution to significant cumulative impacts related to utilities and service systems.

Findings

The Board of Trustees finds that, based upon substantial evidence in the record, the potential impacts related to utilities and service systems would be less than significant, and no mitigation measures are required.

Reference

EIR Section 4.19, Utilities and Service Systems, and Appendix G, Water Supply Evaluation

2.3 Potentially Significant Impacts that Can Be Mitigated Below a Level of Significance

Pursuant to Section 21081(a) of the Public Resources Code and Section 15091(a)(1) of the CEQA Guidelines, the Board of Trustees finds that, for each of the following significant effects identified in the Final EIR, changes or alterations have been required in, or incorporated into, the proposed Master Plan that mitigate or avoid the identified significant effects on the environment to less than significant levels. These findings are explained below and are supported by substantial evidence in the record of proceedings.

2.3.1 Aesthetics

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)

As described in Section 4.1, Aesthetics, of the EIR, on-campus residential uses and off-campus residential uses located in proximity to proposed Master Plan components could potentially be affected by on-campus construction lighting. Additionally, 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.

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.

Findings

The Board of Trustees finds that the above mitigation measures are feasible, will reduce the potential light and glare impacts of the proposed Master Plan to less than significant levels, and are adopted by the Board of Trustees. Accordingly, the Board of Trustees finds that, pursuant to Public Resources Code Section 21081(a)(1), and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Master Plan that mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

Rationale

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, and impacts would be reduced to less than significant. MM-AES-2 would ensure that design of individual components under the proposed Master Plan would

not include large expanses of reflective glass or reflective metal surfaces, thereby reducing impacts of the proposed Master Plan related to new sources of glare to less than significant.

Reference

EIR Section 4.1, Aesthetics

2.3.2 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)**

As described in Section 4.4, Biological Resources, of the Final EIR (Subsection 4.4.4.2, Project Impacts), implementation of the proposed Master Plan could result in direct impacts on all 6 special-status plant species (intermediate mariposa-lily, Parry's spineflower, many-stemmed dudleya, mesa horkelia, white rabbit-tobacco, and chaparral ragwort) and all 14 special-status wildlife species with at least a moderate potential to occur on the Cal Poly Pomona campus 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), and on common birds protected by California Fish and Game Code and the federal Migratory Bird Treaty Act (MBTA) that may be nesting in areas of disturbance. 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. Given the potential for direct and indirect impacts to special-status plant and wildlife species and to birds protected under the MBTA and/or California Fish and Game Code, this could lead to significant impacts without implementation of mitigation measures.

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-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.

Findings

The Board of Trustees finds that the above mitigation measures are feasible, will reduce the proposed Master Plan's potentially significant impact to special-status plant and wildlife species, and are adopted by the Board of Trustees. Accordingly, the Board of Trustees finds that, pursuant to Public Resources Code Section 21081(a)(1), and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Master Plan that mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

Rationale

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. MM-BIO-1 requires that a qualified biologist conduct focused biological surveys before construction begins for projects with potential to impact special-status plant or wildlife species or their habitats, and a report detailing survey results and required mitigation be submitted to Cal Poly Pomona prior to the start of individual project

activities. MM-BIO-3 requires that activities with the potential to impact nesting birds be conducted outside the breeding season, or for appropriate surveys to be conducted and buffer zones to be established if construction must occur during the breeding season. Temporarily impacted habitats will be restored, and permanently lost habitats will be mitigated through 1:1 habitat replacement or via credits from an approved mitigation bank. MM-BIO-4 requires a biological monitor to monitor initial ground-disturbing activities and ensure compliance with mitigation measures. MM-BIO-5 requires a WEAP to educate workers about sensitive biological resources in the area, potential construction impacts, protection measures, and project limits. MM-BIO-6 requires demarcation of limits of disturbance to prevent inadvertent disturbance to sensitive biological resources. MM-BIO-7A requires access controls and signage in necessary areas, MM-BIO-7B requires preparation of a landscaping and weed control plan (LWCP) to minimize weed invasion into open space areas, and MM-BIO-7C requires lighting control to minimize light spill and illumination of adjacent wildlife habitat. Accordingly, implementation of these mitigation measures would minimize impacts to special-status species.

Reference

EIR Section 4.4, Biological Resources, and Appendix C, Biological Resources Potential to Occur Tables

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)

As described in Section 4.4, Biological Resources, of the Final EIR (Subsection 4.4.4.2, Project Impacts), implementation of the proposed Master Plan could result in direct and indirect impacts to all seven sensitive vegetation communities mapped within the Master Plan area (*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). 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 open space could result in the loss or degradation of sensitive vegetation communities.

Mitigation Measures

See MM-BIO-4, MM-BIO-5, MM-BIO-6, MM-BIO-7A, and MM-BIO-7B above.

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

Findings

The Board of Trustees finds that the above mitigation measures are feasible, will reduce the proposed Master Plan's potentially significant impact on sensitive vegetation communities, and are adopted by the Board of Trustees. Accordingly, the Board of Trustees finds that, pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Master Plan that mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

Rationale

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, MM-BIO-5, MM-BIO-6, MM-BIO-7A, and MM-BIO-7B, potential short-term and long-term indirect impacts to sensitive vegetation communities would be reduced to less than significant. MM-BIO-2 requires sensitive vegetation communities that may be impacted during individual project implementation to be demarcated and flagged. Direct impacts should be avoided, and an appropriate buffer will be established to prevent indirect impacts. BMPs shall be recommended to avoid or minimize indirect impacts to sensitive vegetation communities near construction activities. If impacts cannot be avoided, temporarily affected areas will be restored, and

permanent impacts will be mitigated at a minimum 1:1 ratio through habitat conservation or mitigation bank credits. MM-BIO-4 requires a biological monitor to monitor initial ground-disturbing activities and ensure compliance with mitigation measures. MM-BIO-5 requires a WEAP to educate workers about sensitive biological resources in the area, including sensitive vegetation communities. MM-BIO-6 requires demarcation of limits of disturbance to prevent inadvertent disturbance to sensitive biological resources. MM-BIO-7A requires access controls and signage in necessary areas and MM-BIO-7B requires preparation of an LWCP to minimize weed invasion into open space areas. Accordingly, implementation of these mitigation measures would ensure that impacts to sensitive vegetation communities are minimized.

Reference

EIR Section 4.4, Biological Resources, and Appendix C, Biological Resources Potential to Occur Tables

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)**

As described in Section 4.4, Biological Resources, of the Final EIR (Subsection 4.4.4.2, Project Impacts), 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. Furthermore, as project designs are finalized, additional projects may include disturbance to areas containing or near potentially jurisdictional aquatic resources. 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 of beneficial uses, functions, and values of jurisdictional waters.

Mitigation Measures

See MM-BIO-4, MM-BIO-5, MM-BIO-6, MM-BIO-7A, and MM-BIO-7B above.

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.

Findings

The Board of Trustees finds that the above mitigation measures are feasible, will reduce the proposed Master Plan's potentially significant impact on jurisdictional aquatic resources, and are adopted by the Board of Trustees. Accordingly, the Board of Trustees finds that, pursuant to Public Resources Code Section 21081(a)(1), and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Master Plan that mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

Rationale

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, MM-BIO-5, MM-BIO-6, MM-BIO-7A, and MM-BIO-7B, potential short-term and long-term indirect impacts of the proposed Master Plan, including near-term projects, to jurisdictional aquatic resources would be reduced to less than significant. MM-BIO-8 requires coordination with agencies 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, the Porter–Cologne Water Quality Control Act (WDR), 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. MM-BIO-4 requires a biological monitor to monitor initial ground-disturbing activities and ensure compliance with mitigation measures. MM-BIO-5 requires a WEAP to educate workers about sensitive biological resources in the area, including potentially jurisdictional aquatic resources. MM-BIO-6 requires demarcation of limits of disturbance to prevent

inadvertent disturbance to sensitive biological resources. MM-BIO-7A requires access controls and signage in necessary areas and MM-BIO-7B requires preparation of an LWCP to minimize weed invasion into open space areas. Accordingly, implementation of these mitigation measures would ensure that impacts to jurisdictional aquatic resources are minimized.

Reference

EIR Section 4.4, Biological Resources, and Appendix C, Biological Resources Potential to Occur Tables

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)

As described in Section 4.4, Biological Resources, of the Final EIR (Subsection 4.4.4.2, Project Impacts), 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 and 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 Master Plan including near-term projects could impede the use of native wildlife nursery sites (bat roosts).

Mitigation Measures

See above for MM-BIO-1-6, MM-BIO-4, MM-BIO-5, MM-BIO-7A, MM-BIO-7B, and MM-BIO-7C.

Findings

The Board of Trustees finds that the above mitigation measures are feasible, will reduce the proposed Master Plan's potentially significant impact on native wildlife nursery sites, and are adopted by the Board of Trustees. Accordingly, the Board of Trustees finds that, pursuant to Public Resources Code Section 21081(a)(1), and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Master Plan that mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

Rationale

With the implementation of MM-BIO-1-6 (Bat Surveys and Roost Avoidance and Exclusion), MM-BIO-4, MM-BIO-5, MM-BIO-7A, MM-BIO-7B, and MM-BIO-7C, potential direct and indirect impacts (both short-term and long-term) of Master Plan projects, including near-term projects, to bat maternity roosts would be reduced to less than significant. MM-BIO-1-6 requires a pre-construction survey for roosting bats to determine if maternity roosts are present on site and details measures to be implemented if found. MM-BIO-4 requires a biological monitor to monitor initial ground-disturbing activities and ensure compliance with mitigation measures. MM-BIO-5 requires a WEAP to educate workers about sensitive biological resources in the area, including bat roosts. MM-BIO-6 requires demarcation of limits of disturbance to prevent inadvertent disturbance to sensitive biological resources. MM-BIO-7A requires access controls and signage in necessary areas and MM-BIO-7B requires preparation of an LWCP to minimize weed

invasion into open space areas. Accordingly, implementation of these mitigation measures would ensure that impacts to wildlife nursery sites (bat roosts) are minimized.

Reference

EIR Section 4.4, Biological Resources, and Appendix C, Biological Resources Potential to Occur Tables

2.3.3 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 Section 15064.5. (Potentially Significant)

As described in Section 4.5, Cultural Resources – Archaeological Resources, of the Final EIR (Subsection 4.5.4.1, Project Impacts), there is a moderate potential for the inadvertent discovery of subsurface archaeological resources if ground disturbance occurs in native soils during Master Plan implementation, including near-term projects. 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.

Mitigation Measures

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.

Findings

The Board of Trustees finds that the above mitigation measures are feasible, will reduce the proposed Master Plan's potentially significant impact on archaeological resources, and are adopted by the Board of Trustees. Accordingly, the Board of Trustees finds that, pursuant to Public Resources Code Section 21081(a)(1), and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Master Plan that mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

Rationale

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.

Reference

EIR Section 4.5, Cultural Resources – Archaeological Resources, and Appendix D-1, Archaeological Resources Inventory Report

Impact 4.5-2 The project could disturb any human remains, including those interred outside of dedicated cemeteries. (Potentially Significant)

As described in Section 4.5, Cultural Resources – Archaeological Resources, of the Final EIR (Subsection 4.5.4.1, Project Impacts), there is a possibility of encountering human remains during Master Plan construction activities.

Mitigation Measures

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.

Findings

The Board of Trustees finds that the above mitigation measures are feasible, will reduce the proposed Master Plan's potentially significant impact on archaeological resources, and are adopted by the Board of Trustees. Accordingly, the Board of Trustees finds that, pursuant to Public Resources Code Section 21081(a)(1), and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Master Plan that mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

Rationale

MM-CUL-4 establishes protocol in compliance with Section 7050.5 of the California Health and Safety Code, CCR Section 15064.5(e), and California Public Resources Code Section 5097.98 in the event of inadvertent discovery of human remains. With implementation of MM-CUL-4, potentially significant impacts to unknown archaeological resources would be reduced to less than significant.

Reference

EIR Section 4.5, Cultural Resources – Archaeological Resources, and Appendix D-1, Archaeological Resources Inventory Report

2.3.4 Geology and Paleontology

Impact 4.8-4 **The project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Potentially Significant)**

As described in Section 4.8, Geology and Paleontology, of the Final EIR (Subsection 4.8.4.2, Project Impacts), the Master Plan area has high paleontological sensitivity at depth, which could result in destruction of a unique paleontological resource during construction. If intact paleontological resources are located on site, ground-disturbing activities associated with construction of the proposed Master Plan, such as grading during site preparation for new building construction, trenching for utilities, and large diameter augering, have the potential to destroy a unique paleontological resource or site.

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.

Findings

The Board of Trustees finds that the above mitigation measure is feasible, will reduce the proposed Master Plan's potentially significant impact on paleontological resources, and is adopted by the Board of Trustees. Accordingly, the Board of Trustees finds that, pursuant to Public Resources Code Section 21081(a)(1), and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Master Plan that mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

Rationale

MM-GEO-1 requires Cal Poly Pomona to retain a qualified paleontologist to determine the potential for encountering deposits of paleontological interest and to prepare a Paleontological Resources Impact Mitigation Program for the proposed Master Plan. 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. Therefore, implementation of MM-GEO-1 would reduce impacts to paleontological resources to less than significant.

Reference

EIR Section 4.8, Geology and Paleontology

2.3.5 Hazards and Hazardous Materials

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)**

As described in Section 4.10, Hazards and Hazardous Materials, of the Final EIR (Subsection 4.10.4.1, Project Impacts), the Cortese List database search revealed documentation, prepared in 1996, that included a closed leaking underground storage tank (LUST) case, and a list of 21 operational underground storage tanks (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.

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.

Findings

The Board of Trustees finds that the above mitigation measure is feasible, will reduce the proposed Master Plan's potentially significant impact on hazards and hazardous materials, and is adopted by the Board of Trustees. Accordingly, the Board of Trustees finds that, pursuant to Public Resources Code Section 21081(a)(1), and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Master Plan that mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

Rationale

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.

Reference

EIR Section 4.10, Hazards and Hazardous Materials

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)

As described in Section 4.10, Hazards and Hazardous Materials, of the Final EIR (Subsection 4.10.4.1, Project Impacts), 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.

Mitigation Measures

See above for MM-HAZ-1.

Findings

The Board of Trustees finds that the above mitigation measure is feasible, will reduce the proposed Master Plan's potentially significant impact on hazards and hazardous materials, and is adopted by the Board of Trustees. Accordingly, the Board of Trustees finds that, pursuant to Public Resources Code Section 21081(a)(1), and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Master Plan that mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

Rationale

MM-HAZ-1 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 near schools would be reduced to less than significant.

Reference

EIR Section 4.10, Hazards and Hazardous Materials

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)

As described in Section 4.10, Hazards and Hazardous Materials, of the Final EIR (Subsection 4.10.4.1, Project Impacts), 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) 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.

Mitigation Measures

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.

Findings

The Board of Trustees finds that the above mitigation measures are feasible, will reduce the proposed Master Plan's potentially significant impact on hazards and hazardous materials, and are adopted by the Board of Trustees. Accordingly, the Board of Trustees finds that, pursuant to Public Resources Code Section 21081(a)(1), and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Master Plan that mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

Rationale

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 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 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 projects related to wildfire risks would be reduced to less than significant.

2.3.6 Noise and Vibration

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)**

As described in Section 4.13, Noise and Vibration, of the Final EIR (Subsection 4.13.4.2, Project Impacts), construction activity and associated temporary noise levels from implementation of the proposed Master Plan (i.e., all planned projects beyond the near-term projects) 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). Additionally, noise from athletic facilities could be significantly greater than the measured daytime ambient level at residence halls (Buildings 60, 61, 62, and 63).

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.

Findings

The Board of Trustees finds that the above mitigation measures are feasible, will reduce the proposed Master Plan's potentially significant noise impact, and are adopted by the Board of Trustees. Accordingly, the Board of Trustees finds that, pursuant to Public Resources Code Section 21081(a)(1), and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Master Plan that mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

Rationale

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 proposed Master Plan 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. 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.

Reference

EIR Section 4.13, Noise and Vibration, and Appendix E, Noise Measurements and Calculations

2.3.7 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 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)**

As described in Section 4.18, Tribal Cultural Resources, of the Final EIR (Subsection 4.18.4.1, Project Impacts), 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.

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.

Findings

The Board of Trustees finds that the above mitigation measures are feasible, will reduce the proposed Master Plan's potentially significant tribal cultural resources impact, and are adopted by the Board of Trustees. Accordingly, the Board of Trustees finds that, pursuant to Public Resources Code Section 21081(a)(1), and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Master Plan that mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

Rationale

Implementation of MM-TCR-1 (Native American Monitoring) would invite a Native American monitor from the proposed Master Plan's interested consulting tribe(s) to be present during all initial ground-disturbing activities for the proposed Master Plan. 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. MM-TCR-2 (Inadvertent Discovery Protocols for Tribal Cultural Resource Objects [Non-Funerary/Non-Ceremonial]) established protocol in the event that unanticipated tribal cultural resources are exposed during ground-disturbing activities. MM-TCR-3 (Inadvertent Discovery Protocols for Human Remains and Associated Grave Goods) establishes protocol in accordance with Section 7050.5 of the California Health and Safety Code, the CCR Section 15064.5(e), and California Public Resources Code Section 5097.98, in the event that human remains are found. Implementation of these mitigation measures would ensure that any tribal cultural resources encountered during construction activities are protected and impacts are reduced to less than significant.

Reference

EIR Section 4.18, Tribal Cultural Resources

2.4 Potentially Significant Impacts that Cannot Be Mitigated Below a Level of Significance

This section identifies the significant unavoidable impacts that require a statement of overriding considerations to be issued by the Board of Trustees, pursuant to Section 15093 of the CEQA Guidelines, if the proposed Master Plan

is approved. Based on the analysis contained in the Final EIR, the following impacts have been determined to be significant and unavoidable:

2.4.1 Cultural Resources – Historical Resources

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)

As described in Section 4.6, Cultural Resources – Historical Resources, of the Final EIR (Subsection 4.6.4.1, Project Impacts), 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. Given the level of change proposed for contributors to the Mid-Century Modern Campus Core 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. 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). The College of Environmental Design (Building 7) and Library (Building 15) are not only contributors to the historic district but are also considered individually eligible for landmark designation at the federal and state levels. Additionally, 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 associated with renovation of the W.K. Kellogg Arabian Horse Center (Building 29).

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.

Findings

The Board of Trustees finds that implementation of the identified mitigation measures will reduce historical resources impacts attributable to the proposed Master Plan. Pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Master Plan that will mitigate, in part, the significant historical resources impact attributable to the proposed Master Plan, as identified in the Final EIR. However, this impact is considered significant and unavoidable, even with implementation of the mitigation and no additional feasible mitigation measures exist to avoid or mitigate to a less than significant level. Pursuant to Public Resources Code Section 21081(b), see Statement of Overriding Considerations, for the specific overriding economic, legal, social, technological, and other benefits of the proposed Master Plan that outweigh the significant unavoidable impact.

Rationale

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.

Reference

EIR Section 4.6, Cultural Resources – Historical Resources, and Appendix D-2, Historical Resources Technical Report

3 Findings Regarding Alternatives

Section 15126.6(a) of the CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the proposed project but would avoid or substantially lessen any of the significant effects of the proposed project and evaluate the comparative merits of the alternatives." Chapter 6 of the Final EIR identified and considered the following reasonable range of feasible alternatives to the proposed project that would be capable, to varying degrees, of reducing identified impacts:

- Alternative 1: No Project Alternative
- Alternative 2: Reduced Development/Historic Building Demolition Alternative
- Alternative 3: Reduced Development/Adaptive Reuse Alternative

These alternatives are evaluated for their ability to avoid or substantially lessen the impacts of the proposed project identified in the Final EIR, as well as consideration of their ability to meet the basic objectives of the proposed project as described in Section 1.4.

3.1 Alternative 1: No Project Alternative

3.1.1 Description

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. 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. Outside of projects that have already been approved but not yet constructed (see Chapter 3, Table 3-2 of the Final EIR), 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.

3.1.2 Impact Summary

Compared to the proposed Master Plan, Alternative 1 would result in lesser impacts regarding aesthetics, air quality, historic resources, energy, GHG emissions, hydrology and water quality, noise and vibration, population and housing, public services, recreation, transportation, and utilities and service systems. This is generally due to Alternative 1 resulting in fewer FTES, less disturbance, and less new building space. However, there would be greater impacts than the proposed Master Plan regarding agriculture and forestry, biological resources, archaeological resources, geology and paleontology, hazards and hazardous materials, and tribal cultural resources.

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 of the Final EIR. 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. Additionally, mitigation measures provided in the 2000 Master Plan EIR focus only on Coastal California gnatcatcher and California black walnut, a sensitive vegetation community. No mitigation measures for special-status plants, Crotch'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.

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.

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.

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.

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 tribal cultural resources 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.

3.1.3 Findings

The Board of Trustees rejects Alternative 1 as it fails to satisfy the proposed Master Plan's underlying purpose and would not meet any of the project objectives, and would result in greater impacts to several environmental topics compared to the proposed Master Plan due to the limitations of the 2000 Master Plan EIR mitigation measures. While Alternative 1 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 to biological resources.

3.1.4 Rationale

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).

As discussed above, there would be greater impacts than the proposed Master Plan regarding agriculture and forestry, biological resources, archaeological resources, geology and paleontology, hazards and hazardous materials, and tribal cultural resources. 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.

3.1.5 Reference

For a complete discussion of impacts associated with Alternative 1, see Section 6.3.1.2 of the Final EIR. In addition, a summary comparative matrix is provided at the end of Chapter 6 of the Final EIR.

3.2 Alternative 2: Reduced Development/Historic Building Demolition Alternative

3.2.1 Description

Alternative 2 focuses on proposed development on the Cal Poly Pomona campus that would avoid demolition of historic buildings and/or historic district contributors. 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 PDFs and mitigation measures identified in the EIR would also be implemented under Alternative 2.

3.2.2 Impact Summary

Compared to the proposed Master Plan, Alternative 2 would result in lesser impacts regarding aesthetics (scenic quality), air quality, biological resources, archaeological resources, historic resources, energy, geology and paleontology, GHG emissions, hazards and hazardous materials, hydrology and water quality, noise and vibration (construction noise), tribal cultural resources, and utilities and service systems. This is generally due to Alternative 2 resulting in less new building space and less ground disturbance. Regarding historic resources, 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. Therefore, impacts would still be significant unavoidable under Alternative 2, albeit reduced compared to the proposed Master Plan.

Impacts to aesthetics (light and glare), agriculture and forestry resources, land use and planning, noise and vibration (operational), population and housing, public services, recreation, and transportation would remain the same as the proposed Master Plan because there would be minimal or no changes to project components that would affect these environmental topics.

Alternative 2 would not result in greater impacts compared to the proposed Master Plan for any of the environmental topics.

3.2.3 Findings

The Board of Trustees rejects Alternative 2 as it would not meet the project objectives to the same extent as the proposed Master Plan and because specific economic, legal, social, technological or other considerations make the alternative infeasible.

3.2.4 Rationale

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).

Alternative 2 does not fully meet the project objectives. Additionally, avoiding building demolition may not be feasible in all instances and would need to be assessed on a project-by-project basis.

3.2.5 Reference

For a complete discussion of impacts associated with Alternative 2, see Section 6.3.2.2 of the Final EIR. In addition, a summary comparative matrix is provided at the end of Chapter 6 of the Final EIR.

3.3 Alternative 3: Reduced Development/Adaptive Reuse Alternative

3.3.1 Description

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. 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. All PDFs and mitigation measures identified in the EIR would also be implemented under Alternative 3.

3.3.2 Impact Summary

Compared to the proposed Master Plan, Alternative 3 would result in lesser impacts regarding aesthetics, air quality, biological resources, archaeological resources, historic resources, energy, geology and paleontology, GHG emissions, hazards and hazardous materials, hydrology and water quality, noise and vibration (construction noise), tribal cultural resources, and utilities and service systems. This is generally because 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. Regarding historic resources, 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 to less than significant with mitigation under Alternative 3.

Impacts to agriculture and forestry resources, land use and planning, noise and vibration (operational), population and housing, public services, recreation, and transportation would remain the same as the proposed Master Plan because there would be minimal or no changes to project components that would affect these environmental topics.

Alternative 3 would not result in greater impacts compared to the proposed Master Plan for any of the environmental topics.

3.3.3 Findings

The Board of Trustees rejects Alternative 2 as it would not meet the project objectives to the same extent as the proposed Master Plan and because specific economic, legal, social, technological or other considerations make the alternative infeasible.

3.3.4 Rationale

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).

While Alternative 3 is the environmentally superior alternative, it does not fully meet the project objectives. 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.

3.3.5 Reference

For a complete discussion of impacts associated with Alternative 3, see Section 6.3.3.2 of the Final EIR. In addition, a summary comparative matrix is provided at the end of Chapter 6 of the Final EIR.

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4 General California Environmental Quality Act Findings

4.1 Mitigation Monitoring and Reporting Program

Based on the entire record before the Board of Trustees and having considered the significant unavoidable impacts of the proposed Master Plan, the Board of Trustees hereby determines that all feasible mitigation within the responsibility and jurisdiction of the University has been adopted to reduce or avoid the potentially significant impacts identified in the Final EIR, and that no additional feasible mitigation is available to further reduce significant impacts. The feasible mitigation measures are discussed in Sections 2.3 and 2.4, above, and are set forth in the Mitigation Monitoring and Reporting Program.

Section 21081.6 of the Public Resources Code requires the Board of Trustees to adopt a monitoring or compliance program regarding the changes in the proposed Master Plan and mitigation measures imposed to lessen or avoid significant effects on the environment. The Mitigation Monitoring and Reporting Program for the proposed Master Plan is hereby adopted by the Board of Trustees because it fulfills the CEQA mitigation monitoring requirements:

- The Mitigation Monitoring and Reporting Program is designed to ensure compliance with the changes in the proposed Master Plan and mitigation measures imposed on the proposed Master Plan during implementation; and
- Measures to mitigate or avoid significant effects on the environment are fully enforceable through conditions of approval, permit conditions, agreements or other measures.

4.2 California Environmental Quality Act Guidelines Sections 15091 and 15092 Findings

Based on the foregoing findings and the information contained in the administrative record, the Board of Trustees has made one or more of the following findings with respect to each of the significant effects of the proposed Master Plan:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and such changes have been adopted by such other agency, or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly-trained workers, make infeasible the mitigation measures or alternatives identified in the Final EIR.

Based on the foregoing findings and the information contained in the administrative record, and as conditioned by the foregoing:

1. All significant effects on the environment due to the project have been eliminated or substantially lessened where feasible.

2. Any remaining significant effects that have been found to be unavoidable are acceptable due to the overriding considerations set forth herein.

4.3 Board of Trustees Independent Judgment

The Final EIR for the proposed Master Plan reflects the Board of Trustees' independent judgment. The Board of Trustees has exercised independent judgment in accordance with Public Resources Code 21082.1(c)(3) in retaining its own environmental consultant in the preparation of the EIR, as well as reviewing, analyzing and revising material prepared by the consultant.

Having received, reviewed, and considered the information in the Final EIR, as well as any and all other information in the record, the Board of Trustees of the CSU hereby makes findings pursuant to and in accordance with Sections 21081, 21081.5, and 21081.6 of the Public Resources Code.

4.4 Nature of Findings

Any finding made by the Board of Trustees shall be deemed made, regardless of where it appears in this document. All of the language included in this document constitutes findings by the Board of Trustees, whether or not any particular sentence or clause includes a statement to that effect. The Board of Trustees intends that these findings be considered as an integrated whole and, whether or not any part of these findings fail to cross-reference or incorporate by reference any other part of these findings, that any finding required or committed to be made by the Board of Trustees with respect to any particular subject matter of the Final EIR, shall be deemed to be made if it appears in any portion of these findings.

4.5 Reliance on Record

- The Final EIR (July 2025) for the proposed Master Plan, including appendices
- The Draft EIR (May 2025) for the proposed Master Plan, including appendices
- The Notice of Preparation (NOP) (April 2024) for the proposed Master Plan
- Any appendices, studies or documents cited, referenced, or relied on in the NOP, Draft EIR, Final EIR, or any document prepared for the proposed Master Plan's EIR and either made available to the public during a public review period or included in the Board of Trustees' non-privileged, retained files on the proposed Master Plan
- Reports and technical reports, studies, and memoranda included or referenced in the NOP, Draft EIR, Final EIR, or responses to comments on the proposed Master Plan
- All public notices issued in conjunction with the proposed Master Plan, including notices issued to comply with CEQA, the CEQA Guidelines, or any other law governing the processing and approval of the proposed Master Plan
- Scoping Meeting(s) notices and comments received at Scoping Meeting(s)
- The Notice of Availability and Notice of Completion of the Draft EIR
- Comments received on the NOP

- All reports, studies, memoranda, maps, or other planning or environmental documents relating to the proposed Master Plan or its compliance with CEQA and prepared by the Board of Trustees, consultants to the Board of Trustees, or responsible or trustee agencies with respect to the proposed Master Plan that were either made available to the public during a public review period or included in the Board of Trustees' non-privileged, retained files on the proposed Master Plan
- All written comments and attachments on the proposed Master Plan received from agencies, organizations, or members of the public during the Draft EIR comment period or prior to the close of the public hearing before the Board of Trustees
- All responses to comments received from agencies, organizations, or members of the public in connection with the proposed Master Plan or its compliance with CEQA
- Any supplemental documents submitted to the Board of Trustees prior to public hearings on the proposed Master Plan
- Staff reports prepared for the Board of Trustees for any information sessions, public meetings, and public hearings relating to the proposed Master Plan, and any exhibits or attachments thereto
- Minutes and/or transcripts of all public information sessions, public meetings, and public hearings relating to the proposed Master Plan (including all presentation material used or relied upon at such sessions, meetings, and hearings)
- Any documentary or other evidence submitted to the Board of Trustees at such information sessions, public meetings, and public hearings
- Any proposed decisions or findings submitted to the Board of Trustees and either made available to the public during a public review period or included in the Board of Trustees' non-privileged, retained files on the proposed Master Plan
- All findings and resolutions adopted by the Board of Trustees in connection with the project, and all documents cited or referred to therein
- The Mitigation Monitoring and Reporting Program for the proposed Master Plan
- Any documents expressly cited in these findings and any documents incorporated by reference
- Any other written materials relevant to the Board of Trustees' compliance with CEQA or its decision on the merits of the proposed Master Plan, including any documents or portions thereof, that were released for public review, relied upon in the environmental documents prepared for the proposed Master Plan, or included in the Board of Trustees non-privileged retained files for the EIR or proposed Master Plan
- The Notice of Determination

The Board of Trustees intends that only those documents relating to the proposed Master Plan and its compliance with CEQA and prepared, owned, used, or retained by the Board of Trustees and listed above shall comprise the administrative record for the proposed Master Plan. Only that evidence was presented to, considered by, and ultimately before the Board of Trustees prior to reviewing and reaching its decision on the EIR and the proposed Master Plan.

4.6 Custodian of Records

The custodian of the documents or other material that constitute the record of proceedings upon which the Board of Trustees' decision is based is identified as follows:

Carmen Chan, AICP, Planning Manager
Facilities Planning & Management
3801 West Temple Avenue
Pomona, California 91768

4.7 Recirculation Not Required

CEQA Guidelines Section 15088.5 provides the criteria that a lead agency is to consider when deciding whether it is required to recirculate an EIR. Recirculation is required when "significant new information" is added to the EIR after public notice of the availability of the Draft EIR is given, but before certification (14 CCR 15088.5[a]). "Significant new information," as defined in CEQA Guidelines Section 15088.5(a), means information added to an EIR that changes the EIR so as to deprive the public of a meaningful opportunity to comment on a "substantial adverse environmental effect" or a "feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement."

An example of significant new information provided by the CEQA Guidelines is a disclosure showing that a "new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;" that a "substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance;" or that a "feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it" (14 CCR 15088.5[a][1]-[3]).

Recirculation is not required where "the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR." (14 CCR 15088.5[b]). Recirculation also is not required simply because new information is added to the EIR — indeed, new information is oftentimes added given CEQA's public/agency comment and response process and CEQA's post-Draft EIR circulation requirement of proposed responses to comments submitted by public agencies. In short, recirculation is "intended to be an exception rather than the general rule." (Laurel Heights Improvement Assn. v. Regents of University of California (1993) 6 Cal.4th 1112, 1132.)

In this legal context, the Board of Trustees finds that recirculation of the Draft EIR prior to certification is not required. In addition to providing responses to comments, the Final EIR includes revisions to expand upon information presented in the Draft EIR; explain or enhance the evidentiary basis for the Draft EIR's findings; update information; and to make clarifications, amplifications, updates, or helpful revisions to the Draft EIR. The Final EIR's revisions, clarifications and/or updates do not result in any new significant impacts or increase the severity of a previously identified significant impact.

In sum, the Final EIR demonstrates that the proposed Master Plan will not result in any new significant impacts or increase the severity of a significant impact, as compared to the analysis presented in the Draft EIR. The changes reflected in the Final EIR also do not indicate that meaningful public review of the Draft EIR was precluded in the first instance. Accordingly, recirculation of the EIR is not required as revisions to the EIR are not significant as defined in Section 15088.5 of the CEQA Guidelines.

5 Certification of the Final Environmental Impact Report California Environmental Quality Act Guidelines Section 15090

The Board of Trustees certifies that the Final EIR, dated July 2025, has been completed in compliance with CEQA and the CEQA Guidelines, that the EIR was presented to the Board of Trustees, and that the Board reviewed and considered the information contained therein before approving the project, and that the EIR reflects the independent judgment and analysis of the Board (14 CCR 15090.)

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6 Statement of Overriding Considerations

Pursuant to Public Resources Code Section 21081(b) and CEQA Guidelines Section 15093(a) and (b), the Board of Trustees is required to balance, as applicable, the economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological or other benefits of the project, including regionwide or statewide environmental benefits, outweigh the unavoidable adverse environmental effects, those effects may be considered "acceptable" (14 CCR 15093 [a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are not avoided or substantially lessened. Those reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (14 CCR 15093[b]).

Courts have upheld overriding considerations that were based on a variety of policy considerations including, but not limited to, new jobs, stronger tax base, and implementation of an agency's economic development goals, growth management policies, redevelopment plans, the need for housing and employment, conformity to community plan, and provision of construction jobs, see *Towards Responsibility in Planning v. City Council* (1988) 200 Cal App. 3d 671; *Dusek v. Redevelopment Agency* (1985) 173 Cal App. 3d 1029; *City of Poway v City of San Diego* (1984) 155 Cal App. 3d 1037; *Markley v. City Council* (1982) 131 Cal App.3d 656. In accordance with the requirements of CEQA and the CEQA Guidelines, the Board of Trustees finds that the mitigation measures identified in the Final EIR and the Mitigation Monitoring and Reporting Program, when implemented, will avoid or substantially lessen many of the significant effects identified in the Final EIR for the proposed Master Plan. However, certain significant impacts of the proposed Master Plan are unavoidable even after incorporation of all feasible mitigation measures. These significant unavoidable impacts are related to historical resources. The Final EIR provides detailed information regarding these impacts (see also, Findings, Section 2.4, Potentially Significant Impacts that Cannot Be Mitigated Below a Level of Significance).

The Board of Trustees finds that all feasible mitigation measures identified in the Final EIR within the purview of the CSU shall be implemented with the proposed Master Plan. Based on substantial evidence in the whole of the administrative record for the proposed Master Plan, the Board of Trustees hereby determines that the remaining significant unavoidable effects are outweighed and found to be acceptable in light of the following specific overriding economic, legal, social, technological, or other benefits. Each proposed Master Plan benefit described below constitutes a separate overriding consideration warranting adoption of the proposed Master Plan, independent of the other benefits, and outweighs each and every potentially significant unavoidable impact.

a. The proposed Master Plan implements the University's educational mission to accommodate student enrollment growth and associated physical development to support enrollment of 30,000 FTES. 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.
b. The proposed Master Plan would update and better utilize academic and student support services facilities throughout the campus and renovate or demolish buildings that are inefficient in terms of operation, maintenance, and user comfort due to age and critical deferred maintenance. Demolished and temporary buildings would be replaced with higher-density, mixed-use buildings that consolidate and integrate colleges and student support services.

c. The proposed Master Plan would 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 including affordable student housing options; and include common spaces, active outdoor spaces, and space for student support services within student housing.

d. The proposed Master Plan would implement campus-wide improvements that enhance pedestrian and bicyclist safety and expand access to public transit opportunities, including roadway reconfiguration improvements, improvements to the existing Campus Loop, 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

e. The proposed Master Plan would renovate and expand existing athletic and recreational facilities, designed to support student-athletes. Existing recreational fields would be optimized by utilizing land area and improving connections to and through the sports facilities.

f. 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, in order to provide safe and reliable utilities to the campus community.

g. 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, thereby reducing reliance on fossil fuel consumption. 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.

Considering all the factors, the Board of Trustees finds that there are specific economic, legal, social, technological, and other considerations associated with the proposed Master Plan that serve to override and outweigh the proposed Master Plan's significant unavoidable effects and, thus, the adverse effects are considered acceptable. Therefore, the Board of Trustees hereby adopts this Statement of Overriding Considerations.

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