

Final Environmental Impact Report

Student Housing Replacement

California State Polytechnic University, Pomona



CAL POLY POMONA

August 2016

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August 2016

Lead Agency

The Board of Trustees of the California State University;
California State Polytechnic University, Pomona

Consultant to Lead Agency
WSP | Parsons Brinckerhoff

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Summary

This Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code, Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations, Section 15000 et seq.) to evaluate the potentially significant impacts associated with the Student Housing Replacement project.

The Project

The project provides student housing facilities on campus that are necessary in order to replace the existing aging student housing facilities which are located in the seismic zone. Those existing facilities currently provide 1,400 student beds, and include Cedritos, Palmitas, Encinitas, Alamitos, Aliso, and Montecito residence halls, and the Los Olivos Dining Commons.

The student housing replacement facilities will be located on a 13-acre site in the southeastern area of the campus, which is currently used as a horse pasture. The project includes shifting a segment of Kellogg Drive to the east, placing it along the eastern boundary of the site, and separating the site from the horse pasture to the east.

The project facilities will provide student housing with 1,645 beds, a dining facility, and associated surface parking. These new student residence facilities will replace 1,400 beds in existing student residence halls, as well as provide 245 additional beds on campus. The facilities are anticipated to be developed in two phases, with approximately 980 beds provided by 2019, and the remaining 665 beds by 2022. As each phase of the student housing facilities is completed, the existing student housing facilities that are being replaced will be removed.

The residence halls are anticipated to be six to eight stories tall, and the dining commons will be a single-story facility.

To serve these facilities, the existing central plant on campus will also be improved.

Project Objectives

The primary project objectives are to:

- Provide the student housing replacement facilities necessary to replace the existing aging student housing facilities which are located in a seismic fault zone

- Enhance the provision of student housing on campus to help accommodate the strong student demand for on-campus housing
- Enhance the provision of student housing on campus since living on campus increases students' academic success and improves graduation rates

Environmental Impacts

This EIR evaluates the potential environmental impacts associated with the project and identifies mitigation measures capable of avoiding or substantially reducing the identified potential significant impacts. A summary of environmental impacts, mitigation measures, and a level of impact remaining after mitigation is presented in Table S-1 at the end of this Summary.

The analysis contained in this EIR uses words “significant” and “less than significant” in the discussion of impact. These words specifically define the degree of impact and parallel language used in CEQA Guidelines. As required by CEQA, mitigation measures have been identified in this EIR to avoid or substantially reduce the level of potentially significant impacts to the greatest extent possible.

Beneficial Impacts

This EIR identifies the following effects of the Student Housing Replacement project that are beneficial:

- Reducing commute trips and vehicle miles traveled (VMTs)
- Reducing vehicular air pollutant emissions and greenhouse gases (GHG)

Impacts Considered and Found to be Less Than Significant

The analysis contained in the EIR indicates that the project will not result in a significant impact with respect to the following:

- Traffic and circulation
- Fire and police services
- Utilities and service systems
- Hydrology and water quality
- Short-term construction effects on water quality
- Cumulative effects, other than short-term cumulative peak day construction emissions

- Growth-inducing and irreversible effects

Pursuant to CEQA and the CEQA Guidelines, an Initial Study was prepared for this project (refer to Appendix A). The Initial Study concluded that the project will result in either no impact or a less than significant impact with regards to:

- Agriculture and forest resources
- Biological resources
- Geology and soils
- Hazards and hazardous materials
- Land use and planning
- Mineral resources
- Noise
- Housing and population
- Recreation

Potentially Significant Impacts That Can Be Mitigated

The EIR analysis identified the following potentially significant impact associated with the project that can be mitigated to a less than significant level.

- Short-term and intermittent construction noise, traffic, and solid waste

Unavoidable Significant Impacts

The CEQA Guidelines define a significant impact on the environment as “a substantial, or potentially substantial, adverse change in any of the physical conditions within an area affected by the project, including land, air, water, flora, fauna, ambient noise, and objects of historic or aesthetic significance” (Section 15382). In order to approve a project with unavoidable significant impacts, the lead agency must adopt a Statement of Overriding Considerations. In adopting such a statement, the lead agency finds that it has reviewed the EIR, has balanced the benefits of the project against its unavoidable significant effects, and has concluded that the benefits of the project outweigh the unavoidable adverse environmental effects, and thus, the adverse environmental effects may be considered “acceptable” (CEQA Guidelines, Section 15093[a]).

- Aesthetics
- Historic resources
- Short-term and intermittent peak construction day cumulative air quality impact

Alternatives to the Project

Alternatives to the project considered include the following:

- Alternative 1: “No Project”
- Alternative 2: Smaller Project
- Alternative 3: Alternate Location
- Alternative 4: Additional Student Housing

Among the alternatives considered, the Additional Student Housing Alternative could be considered environmentally superior to the project because while it would result in the same impacts as those associated with the Student Housing Replacement project, it would significantly increase the beneficial air quality and GHG effects as well as achieve project objectives to a much greater extent. However, since funding for additional student housing is not in place, this alternative may not be fiscally viable at this time.

Mitigation Monitoring Program

In accordance with CEQA Section 21081.6, a mitigation monitoring program will be adopted by CSU Board of Trustees, if the project is approved. The mitigation monitoring program will be prepared as a separate document and will be designed to ensure compliance with the adopted mitigation measures contained in the Final EIR. The program will be available for public review prior to the CSU Board of Trustees actions on the Student Housing Replacement project.

Summary of Impacts

Table S-1 summarizes the environmental effects associated with the project, the mitigation measures required to avoid or minimize identified environmental impact, and the level of impact remaining after full implementation of identified mitigation measures.

**Table S-1
Summary of Environmental Impacts and Mitigation Measures**

	Potential Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
Beneficial Impacts			
Vehicle Miles Travelled (VMTs)	The provision of additional 245 beds in the project's student housing replacement facilities will result in a reduction of approximately 3,970 vehicle miles traveled (VMTs) per day from commute trips.	Impact will be beneficial.	Beneficial impact
Air Quality and Greenhouse Gases (GHG)	Reducing commute trips will result in a reduction of GHG as well as in reduction in ROG and NO _x emissions. Overall, the project will reduce GHG by 578 metric tons of CO ₂ e per year in comparison with GHG emissions generated by the existing student housing facilities that are being replaced by the project.	Impact will be beneficial.	Beneficial impact
Impacts Considered But Found To Be Less Than Significant (CEQA Guidelines Section 15128)			
Traffic and Circulation	<p>The project will reduce student commute trips and VMTs which will have a beneficial effect of reducing vehicular travel on the street system surrounding the project.</p> <p>Overall, the project will generate 13 net trips in the morning peak hour and 27 trips in the afternoon peak hour. The addition of this small number of trips will not result in a significant impact at any of the study</p>	Impact will be less than significant, and no mitigation is required.	Less than significant

	Potential Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	intersections, freeways, or arterials.		
Fire and Police Services	The project's development will incorporate comprehensive safety and security measures in new student housing replacement facilities, including alarm systems, safety and security lighting, and other features, and will provide all required emergency access. Fire safety is will be incorporated in the design and construction of all facilities, and will include consultations with the Fire Marshal and University fire officials to ensure that all requirements are met. All required fire safety features, including smoke detectors and full sprinkler systems, fire lines and hydrants with appropriate fire flows, and unobstructed fire emergency access will also be provided. With these features, impact on police and fire services will be minimized.	Impact will be less than significant, and no mitigation is required.	Less than significant
Utilities and Service Systems, and Hydrology and Water Quality	Project includes provision of all necessary utility infrastructure connecting to the campus' existing water, sewer, and drainage utility grid which has the capacity to accommodate the project. The mandated water conservation measures including ultra-low-flow toilets, urinals, taps, water conservation plumbing, and other required conservation measures; use native or drought-resistant vegetation in landscaping, and use recycled water for irrigating landscaped areas, that will reduce the amount of water	Impact will be less than significant, and no mitigation is required.	Less than significant

	Potential Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	<p>used, as well as the resultant sewer discharges.</p> <p>With implementation of stormwater management control BMPs, including provision of bioswales, runoff will be captured, retained, and filtered, reducing stormwater discharges and improving stormwater quality.</p> <p>The student housing replacement facilities development will also implement comprehensive waste reduction, diversion, and recycling programs that will significantly reduce the amount of waste needed disposal. With these components and payment of all legally required capital facilities fees, impact on utility systems, hydrology and water quality will be minimized.</p>		
Short-term construction effects on water quality	<p>Construction of new facilities will proceed in compliance with current regulations that require design and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which includes implementation of Best Management Practices (BMPs) throughout construction to reduce impacts on water quality.</p>	Impact will be less than significant, and no mitigation is required.	Less than significant
Growth-inducing effects	<p>The project provides for replacement of existing student housing facilities on campus, and additional student beds in its new replacement facilities. The project does not provide housing for residents of the city or the surrounding areas that could induce population growth, and will not result</p>	Impact will be less than significant, and no mitigation is required.	Less than significant

	Potential Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	in an increase in student enrollment at Cal Poly Pomona. The project includes all necessary improvements to the existing infrastructure, and no excess capacity that could induce growth will be provided.		
Significant Environmental Impacts That Can Be Avoided or Mitigated (CEQA Guidelines Section 15126.4)			
Short-term and intermittent construction effects (project-specific and cumulative)	Construction activities may cause localized traffic congestion and noise at some times and locations, and may generate waste.	<ol style="list-style-type: none"> 1. Construction hours will be restricted per City of Pomona regulations, which limit the hours of construction activity between 7:00 am and 6:00 pm Monday through Friday, and from 8:00 am and 6:00 pm on Saturdays. No construction activity will take place on Sunday or federal holidays. 2. Muffled construction equipment will be used whenever possible. 3. Construction staging areas will be located as far as possible from nearby uses. 4. As needed, a temporary barrier of no less than 8 feet in height made of solid wood or other similar material will be provided along the site's northern boundary adjacent to the horse pasture of the Arabian horse center, and along the site's southern boundary to protect the nearby child care center and residential suites from construction noise. 5. A flag person will be employed as needed to direct traffic when heavy construction vehicles enter the site from Pomona Boulevard and Valley Boulevard. 5. Construction and haul trucks will use the City of Pomona designated truck routes to travel to and from the site. 	Less than significant

	Potential Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
		<ol style="list-style-type: none"> 6. Construction-related truck traffic will be scheduled to avoid peak travel time on the I-10 freeway and State Route 57, as feasible. 7. Hauling of equipment and materials and other truck trips during construction will be scheduled during non-peak hours, to the extent feasible. 8. Construction inert materials, including vegetative matter, asphalt, concrete, and other recyclable materials will be recycled to the extent feasible. 	
<p>Unavoidable Significant Environmental Impacts (CEQA Guidelines Section 15126[b] – Lead Agency must issue a “Statement of Overriding Considerations” under CEQA Guidelines Section 15093 if the Agency determines these effects are significant and approves the project)</p>			
Aesthetics	<p>The project’s student residence hall will incorporate architectural details, varied structure rooflines, distinctive building facades, shielded lighting, landscaping, and other features to enhance visual character and quality. The project will also complement the existing Residential Suites student housing facilities to the south of the site, and merging with these Residential Suites will create a larger campus residential community that includes housing, dining, and recreation. It will also create a visual character and an overall visual image representing the student residential community. However, while the implementation of design features into the new facilities and site design is anticipated to result in the development of the site that, on its own, is visually high</p>	<p>The project design will incorporate architectural details, varied structure rooflines, distinctive building facades, shielded lighting that is focused away from the surrounding area, landscaping, and other features to enhance visual character and quality of the student replacement facilities. These measures will enhance the visual character of the student housing replacement facilities; however there are no additional feasible mitigation measures to reduce the visual effect of the change itself from a horse pasture to urban landscape.</p>	<p>Even with incorporation of the project design features, the change itself in the visual character of the site may be considered by some to be a significant impact that cannot be mitigated.</p>

	Potential Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	quality and attractive in a long-term, the change itself from a horse pasture to an urban landscape may be considered by some to be a significant impact in the visual character of the site and the surrounding area.		
Historic Resources	The project will replace existing student housing facilities that are located in the seismic zone, including the Palmitas and Cedritos residence halls. These halls appear to be eligible for the California Register as part of a historic district because it is a significant example of the work of the highly noted Southern California architectural firm, Smith & Williams.	<p>The following mitigation measures will be implemented prior to removal of the Palmitas and Cedritos residence halls:</p> <ol style="list-style-type: none"> 1. Commission professional HABS-style photographic documentation of the entire potential historic district with color 35-millimeter photographs, accompanied by HABS outline documentation. Building documentation should concentrate on the Palmitas and Cedritos residence halls buildings and their settings, but should also cover the La Cienega Center – which is a contributor to the district. File the documentation with the Cal Poly Pomona Library Department of Special Collections and Archives as well as with the Smith & Williams records, Architecture and Design Collection of the Art, Design & Architecture Museum at the University of California, Santa Barbara. 2. Commission professional, brief video documentation with informal narration of the entire district to note the landscape, indoor and outdoor spaces, qualities and materials of the buildings, and the interconnections among the buildings in the grouping. File the video documentation with the Cal Poly Pomona Library Department of Special Collections and Archives. 	Even with incorporation of the identified mitigation measures impact to historic resources resulting from removal of the Palmitas and Cedritos residence halls will remain significant.

	Potential Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
Short-term and intermittent peak day cumulative construction air quality effects	Construction of student housing replacement facilities will involve equipment and activities that generate air pollutant emissions. The peak construction day emissions will be below the SCAQMD threshold amounts for most criteria pollutants, except for emissions of reactive organic gases (ROG) and oxides of nitrogen (NO _x).	<p>The University will implement the following mitigation measures to reduce identified impacts by imposing conditions on the construction contractor.</p> <ol style="list-style-type: none"> 1. During high wind episodes (wind speeds exceeding a sustained rate of 25 miles per hour); grading or other high-dust generating activities will be suspended. 2. During smog alerts, all construction activities will be suspended. 3. All construction equipment will be properly tuned. 4. Diesel particulate filters are installed on diesel equipment and trucks and low sulfur diesel will be used for construction equipment. 5. Gasoline, butane, or electric power construction equipment will be used if feasible. 6. To reduce emissions from idling, all equipment and vehicles not in use for more than 5 minutes will be turned off, whenever feasible. 7. Low VOC-content asphalt and concrete will be utilized to the extent possible. 8. All stockpiles will be covered with tarps or plastic sheeting. 9. Speeds on unpaved roads will be reduced below 15 miles per hour. 10. All haul trucks that carry contents subject to airborne dispersal will be covered. 11. All access points to the site used by haul trucks will be kept clean during site earthwork. 12. Exposed surfaces will be watered as needed. 13. All access points used by haul trucks will be kept clean during earthwork. 14. Electricity from power poles rather than temporary diesel or 	Implementation of mitigation measures will reduce peak construction day emissions, however since cumulative emissions of ROG and NO _x could be above the daily threshold amount, the potential remaining impact is considered significant.

	Potential Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
		<p>gasoline generators will be used to the extent available.</p> <p>15. As needed, outdoor activities in the site vicinity will be limited during high-dust and other heavy construction activities.</p> <p>16. Throughout the construction period, filters in the ventilation systems in the child care center building and residential suites to the south of the of the project site will be inspected on a monthly basis and replaced as needed, to ensure that the systems are providing proper ventilation.</p>	

1.0 Introduction

Purpose of the EIR

This Environmental Impact Report (EIR) has been prepared to evaluate the environmental effects of the proposed Student Housing Replacement on the campus of the California State Polytechnic University.

According to the *Guidelines for Implementation of the California Environmental Quality Act*, an “EIR is an informational document which will inform public agencies, decision makers, and the public generally of the significant environmental effects of a project on the environment, identify possible ways to minimize the significant effects, and describe alternatives to the project”.

This EIR is an informational document to be used by decision makers, public agencies, and the general public. It is not a policy document of the University. The EIR will be used by the CSU Board of Trustees in assessing the impacts of the proposed project prior to taking action on the project.

Legal Requirements and Environmental Process

This EIR has been prepared in accordance with the CEQA (Public Resources Code, Section 21000 et seq.) and the CEQA *Guidelines* (California Code of Regulations, Title 14, Section 15000 et seq.). The CSU Board of Trustees is the lead agency for this EIR, as defined in Section 21067 of CEQA.

Notice of Preparation and Initial Study

Pursuant to CEQA and the CEQA Guidelines, an Initial Study was prepared for the Student Housing Replacement project. The Initial Study concluded that the project might have a significant effect on the environment with respect to traffic, air quality, utilities and service systems, hydrology and water quality, aesthetics, and cultural resources, which were addressed in the Draft EIR.

A Notice of Preparation (NOP) for this EIR was issued by the University on November 17, 2015 in accordance with the requirements of the CEQA Guidelines, Sections 15082(a) and 15375. The NOP indicated that an EIR was being prepared and invited comments on the project from the public and public agencies. No comments were received in response to the NOP. The University also held a public meeting on December 8, 2015 to receive comments on the Initial Study. No comments were received at the meeting.

The NOP, Initial Study, and the comment letters received in response to the NOP are included in Appendix A of this Draft EIR.

Draft EIR Public Review and Comment

The Draft EIR was circulated for a 45-day public review from May 31, 2016 to July 14, 2016. The public was invited to comment in writing on the information contained in the document. Persons and agencies commenting were encouraged to provide information that they believed was missing from the Draft EIR, or to identify where the information could be obtained. The University also held a public meeting on June 28, 2016 to receive comments on the Draft EIR. No comments were received at the meeting.

Final EIR

Appropriate revisions to the Draft EIR in response to written comments and information received are identified by shading the clarified or updated text in the Final EIR, as illustrated in this sentence.

Contact Person

The primary contact person regarding information presented in this Draft EIR is Mooris Taylor, Senior Project Manager, California State Polytechnic University, Pomona, 3801 W. Temple Avenue, Pomona, CA 91768; telephone: (909) 869-5173, fax: (909) 896-2292, email: moorist@cpp.edu.

Intended Uses of the EIR

This EIR will be used by the CSU Board of Trustees and the University to provide information necessary for environmental review of actions and approvals for the proposed Student Housing Replacement. These actions include:

Lead Agency

The Board of Trustees of the California State University

- Approval of Major Campus Master Plan Revision
- Approval of Student Housing Replacement schematic plans

Other Public Agencies

Implementation of the project may also involve actions of other agencies, which may include the following as applicable:

- State Fire Marshal
Facility fire safety review and approval
- Three Valleys Municipal Water District
Approval of increase in quantity or new water connections
Approval of construction within TVMWD's easement
- County Sanitation Districts of Los Angeles County
Approval of increase in quantity of wastewater
- Los Angeles County Flood Control District
Approval of increase in quantity of stormwater
- Regional Water Quality Control Board
Compliance with NPDES permit
- Metropolitan Water District
Approval of construction within MDW easement
- Others, as may be necessary

2.0 Project Description

Proposed Project

The proposed project provides student housing facilities on campus that are necessary in order to replace the existing aging student housing facilities which are located in the seismic zone. Those existing facilities currently provide 1,400 student beds, and include Cedritos, Palmitas, Encinitas, Alamitos, Aliso, and Montecito residence halls, and the Los Olivos Dining Commons.

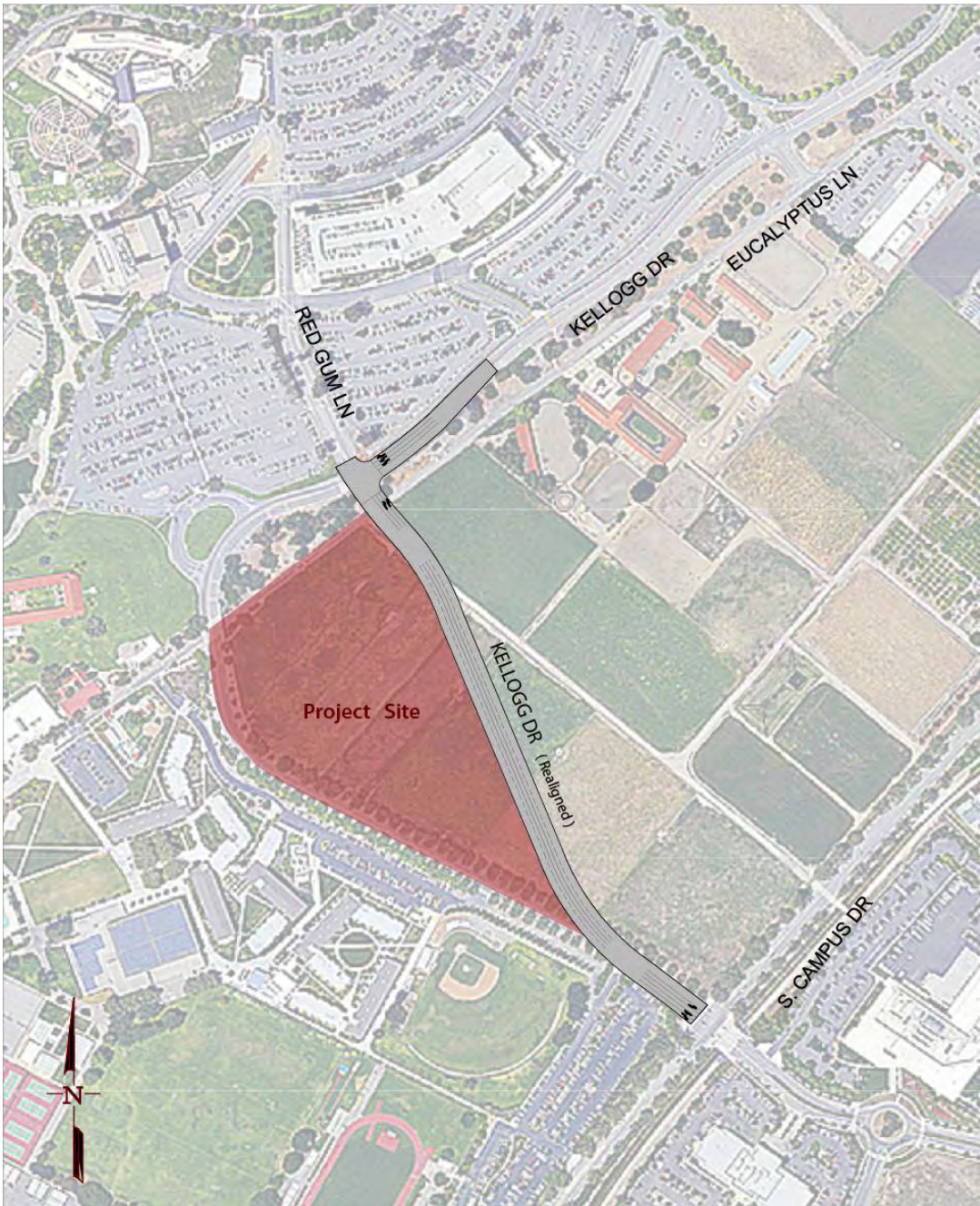
The student housing replacement facilities will be located on a 13-acre site in the southeastern area of the campus, which is currently used as a horse pasture. The project includes shifting a segment of Kellogg Drive to the east, placing it along the eastern boundary of the site (see Figure 1), and separating the site from the horse pasture to the east.

The project facilities will provide student housing with 1,645 beds, a dining facility, and associated surface parking (see Figure 2). These new student residence facilities will replace 1,400 beds in existing student residence halls, as well as provide 245 additional beds on campus. The facilities are anticipated to be developed in two phases, with approximately 980 beds provided by 2019, and the remaining 665 beds by 2022. As each phase of the student housing facilities is completed, the existing student housing facilities that are being replaced will be removed.

The residence halls are anticipated to be six to eight stories tall, and the dining commons will be a single-story facility.

To serve these facilities, the existing central plant on campus will also be improved.

Project Location
Figure 1



Illustrative View
Figure 2



Project Objectives

The primary project objectives are to:

- Provide the student housing replacement facilities necessary to replace the existing aging student housing facilities which are located in a seismic fault zone
- Enhance the provision of student housing on campus to help accommodate the strong student demand for on-campus housing
- Enhance the provision of student housing on campus since living on campus increases students' academic success and improves graduation rates

Project Location

The student housing replacement facilities will be located in the east central area of the campus (see Figure 1). The site is surrounded by the Cal Poly Pomona campus facilities, including a child care center, student residence suites, and a baseball field to the south; surface parking facilities to the west across Kellogg Drive; and the pasture of the Arabian horse center across realigned Kellogg Drive to the east (see Figure 2).

Project Actions

The following actions by the CSU Board of Trustees are required for the project:

- Approval of Major Campus Master Plan Revision
- Approval of Student Housing Replacement schematic plans

Implementation of the project may also involve actions of other agencies, which may include the following as applicable:

- State Fire Marshal
Facility fire safety review and approval
- Three Valleys Municipal Water District
Approval of increase in quantity or new water connections
Approval of construction within TVMWD's easement
- County Sanitation Districts of Los Angeles County
Approval of increase in quantity of wastewater
- Los Angeles County Flood Control District
Approval of increase in quantity of stormwater

- Regional Water Quality Control Board
Compliance with NPDES permit
- Metropolitan Water District
Approval of construction within MDW easement
- Others, as may be necessary

3.0 Environmental Impact Analysis

This section of the EIR examines potential environmental effects associated with the Student Housing Replacement project as identified through the NOP process (see Section 1.0 and Appendix A) and identifies mitigation measures to avoid or substantially reduce impacts found to be potentially significant in the EIR analysis. Each environmental issue for which the Initial Study (see Appendix A) identified a potentially significant impact is discussed in the following manner:

Environmental Setting describes the existing environmental conditions in the vicinity of the project as it exists before the commencement of the project to provide a baseline for comparing “before the project” and “after the project” environmental conditions.

Impact Criteria defines and lists specific criteria used to determine whether an impact is considered to be potentially significant. Appendix G of the CEQA Guidelines; applicable local, State, federal or other standards; and officially established thresholds of significance are the major sources used in crafting criteria appropriate to the specifics of a project, since “...an ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting” (CEQA Guidelines Section 15064[b]). Principally, “... a substantial, or potentially substantial, adverse change in any of the physical conditions within an area affected by the project, including land, air, water, flora, fauna, ambient noise, and objects of historic and aesthetic significance” constitutes a significant impact (CEQA Guidelines Section 15382).

Environmental Impact presents evidence, based to the extent possible on scientific and factual data, about the cause and effect relationship between the project and potential changes in the environment. The exact magnitude, duration, extent, frequency, range or other parameters of a potential impact are ascertained to the extent possible to provide facts in support of finding the impact to be or not to be significant. In determining whether impacts may be significant, all the potential effects, including direct effects, reasonably foreseeable indirect effects, and considerable contributions to cumulative effects, are considered. If, after thorough investigation, a particular impact is too speculative for evaluation, that conclusion is noted (CEQA Guidelines Section 15145).

Mitigation Measures identify measures that can reduce or avoid the potentially significant impact identified in the EIR analysis. Standard existing regulations, requirements, and procedures applicable to the project are considered a part of the existing regulatory environment. Mitigation measures are those feasible, project-specific measures that may be needed in addition to compliance with existing regulations and requirements, in order to reduce significant impacts.

Level of Impact After Mitigation indicates what effect remains after implementation of mitigation measures, and whether the remaining effect is considered significant.

3.1 Traffic and Circulation

This section addresses traffic and circulation issues associated with the Student Housing Replacement project. A traffic study was prepared for the project by Gibson Transportation Consulting in March 2016. The study findings are summarized below, and the study is included in Appendix B of this EIR. The traffic study appendices are provided under separate cover.

Environmental Setting

The student housing replacement facilities will be located on a 13-acre site in the southeastern area of the Cal Poly Pomona campus currently being used as a horse pasture. The project includes shifting a segment of Kellogg Drive to the east, placing it along the eastern boundary of the site and separating the site from the horse pasture to the east.

The project site is bounded by surface parking lots to the north (across the existing alignment of Kellogg Drive), the pasture of the WK Kellogg Arabian Horse Center to the east, and Cal Poly Pomona campus facilities, including a child care center, student residence suites, and a baseball field, to the south and the west.

Major Streets

Major streets in the vicinity of the project site include:

Kellogg Drive – Kellogg Drive is a four-lane roadway that runs in the north-south direction before curving to the east-west direction and is located adjacent to the north side of the Project site. It connects I-10 to South Campus Drive, providing local and regional access to the project site. There is generally no parking allowed on either side of the street within the study area. The posted speed limit is 35 mph.

University Drive – University Drive is a two-lane roadway that runs in the east-west direction before curving to the north-south direction and is located west of the Project site. It connects Kellogg Drive to Temple Avenue and provides local access to the existing student housing facility that is being replaced. On the majority of the segment within the study area, there is generally no parking allowed on either side of the street with a short stretch allowing permitted parking. The posted speed limit is 30 mph.

Temple Avenue – Temple Avenue is a five-lane roadway that runs in the east-west direction and is located south of the Project site. It provides both local and regional access to the Project site. There is generally no parking allowed on either side of the street within the study area. The posted speed limit is 44 to 55 mph.

South Campus Drive – South Campus Drive is a two-lane roadway that runs in the north-south direction and is located east of the project site. It connects East Campus Drive to Temple Avenue and provides local access to the site. There is generally no parking allowed on either side of the street within the study area. The posted speed limit is 45 mph.

Valley Boulevard – Valley Boulevard is a four-lane roadway that runs in the north-south direction and is located east of the project site. It provides both local and regional access to the site through Temple Avenue. There is generally parking allowed on both sides of the street within the study area. The posted speed limit is 45 mph.

Transit System

The project area is served by bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro), and Foothill Transit. Bus transit service in the project vicinity is available along the following streets:

- University Drive
- South Campus Drive
- Temple Avenue
- Kellogg Drive
- Valley Boulevard

Figure 3 illustrates the existing transit service in the study area. Table 1 summarizes the various transit lines operating in the study area for each of the service providers in the region, the type of service (peak vs. off-peak, express vs. local), and frequency of service.

**Table 1
Existing Transit Service**

Provider, Route, and Service Area		Service Type	Hours of Operation	Average Headway (minutes)			
				AM Peak Period		PM Peak Period	
Metro				NB/EB	SB/WB	NB/EB	SB/WB
190/194	El Monte - Cal Poly Pomona via Ramona Blvd. and Valley Blvd.	Local	4:14 AM - 1:57 AM	16	16	13	14
Foothill Transit				NB/EB	SB/WB	NB/EB	SB/WB
195	Cal Poly Pomona - Pomona TransCenter via Reservoir St.	--	5:35 AM - 7:26 PM	60	60	60	60
286	Brea Mall Center - Pomona TransCenter via SR-57 and Diamond Bar Blvd.	--	6:00 AM - 8:50 PM	60	60	60	60
289	Puente Hills Mall - Pomona via La Puente Rd., Grand Ave., and Temple Ave.	--	6:15 AM - 8:09 PM	60	60	60	60
480	Montclair - West Covina via Mission Blvd.	--	5:00 AM - 12:22 AM	27	30	27	27
482	Pomona - Puente Hills Mall via Colima Rd. and Diamond Bar Blvd.	--	4:00 AM - 11:49 PM	30	27	30	18
486	Cal Poly Pomona - El Monte via Amar Rd. and Temple Ave.	--	5:00 AM - 11:52 AM	15	15	15	15
853	Copley Dr. & Golden Springs Rd. - Diamond Bar High School via Golden Springs Dr. [a]	--	6:40 AM - 3:46 PM	30	--	--	5
854	Copley Dr. & Golden Springs Rd. - Diamond Bar High School via Diamond Bar Blvd. and Temple Ave. [b]	--	7:15 AM - 3:42 AM	5	--	--	5

Notes:

Metro: Los Angeles County Metropolitan Transportation Authority

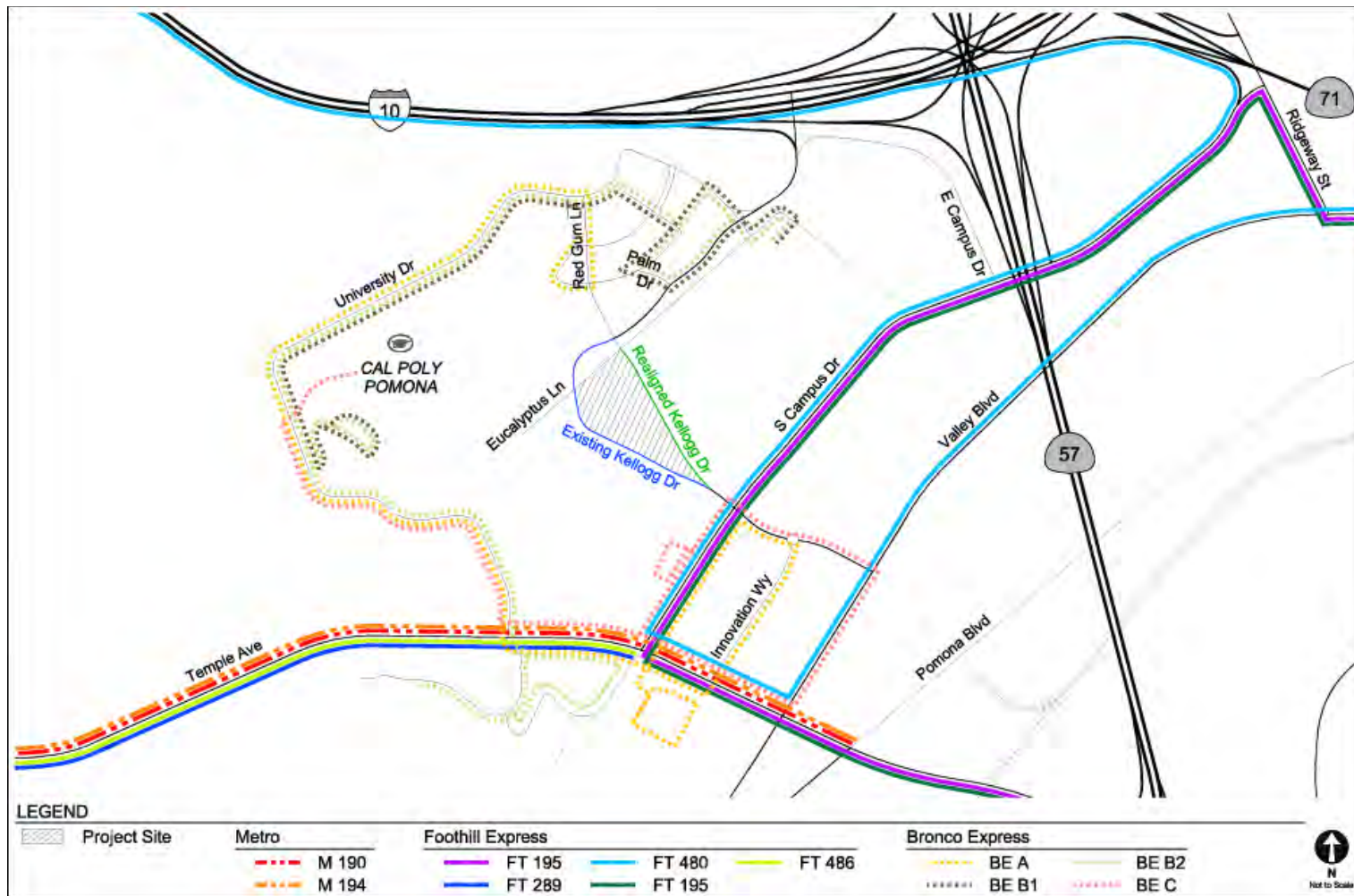
AM Peak from 6-10 AM

PM Peak from 3-7 PM

[a] Line 853 stops only once during the AM Peak Period and does not stop in the NB direction during the PM Peak Period in the vicinity of the Project.

[b] Line 854 does not stop in the SB direction during the AM Peak Period and does not stop in the NB direction during the PM Peak Period.

Existing Transit Service
Figure 3



Bicycle and Pedestrian Network

The existing bicycle system in the study area consists of a limited coverage of bicycle lanes (Class II) and bicycle routes (Class III). Bicycle facilities provided along corridors within the area are:

- South Campus Drive between SR 57 and Kellogg Drive – Class II
- South Campus Drive north of SR 57 and south of Kellogg Drive – Class III

The sidewalks that serve as routes to the project site provide proper connectivity for a comfortable and safe pedestrian environment. The sidewalks provide connectivity to pedestrian crossings connecting to the campus core as well as the adjacent study intersection of South Campus Drive & Kellogg Drive. This pedestrian connectivity is will be maintained with the project. All of the signalized intersections in the study area provide marked pedestrian crosswalks and access ramps with pedestrian phasing.

Existing Traffic Conditions

Figure 4 illustrates the location of the project site in relation to the surrounding street system and the study intersections.

Level of Service (LOS) is a qualitative measure used to describe traffic flow conditions, ranging from excellent conditions at LOS A to overloaded conditions at LOS F. LOS D is typically recognized as the satisfactory level of service in urban areas. Table 2 summarizes the existing weekday AM and PM peak hour delay and the corresponding LOS for each of the seven study intersections.

Study Intersections
Figure 4

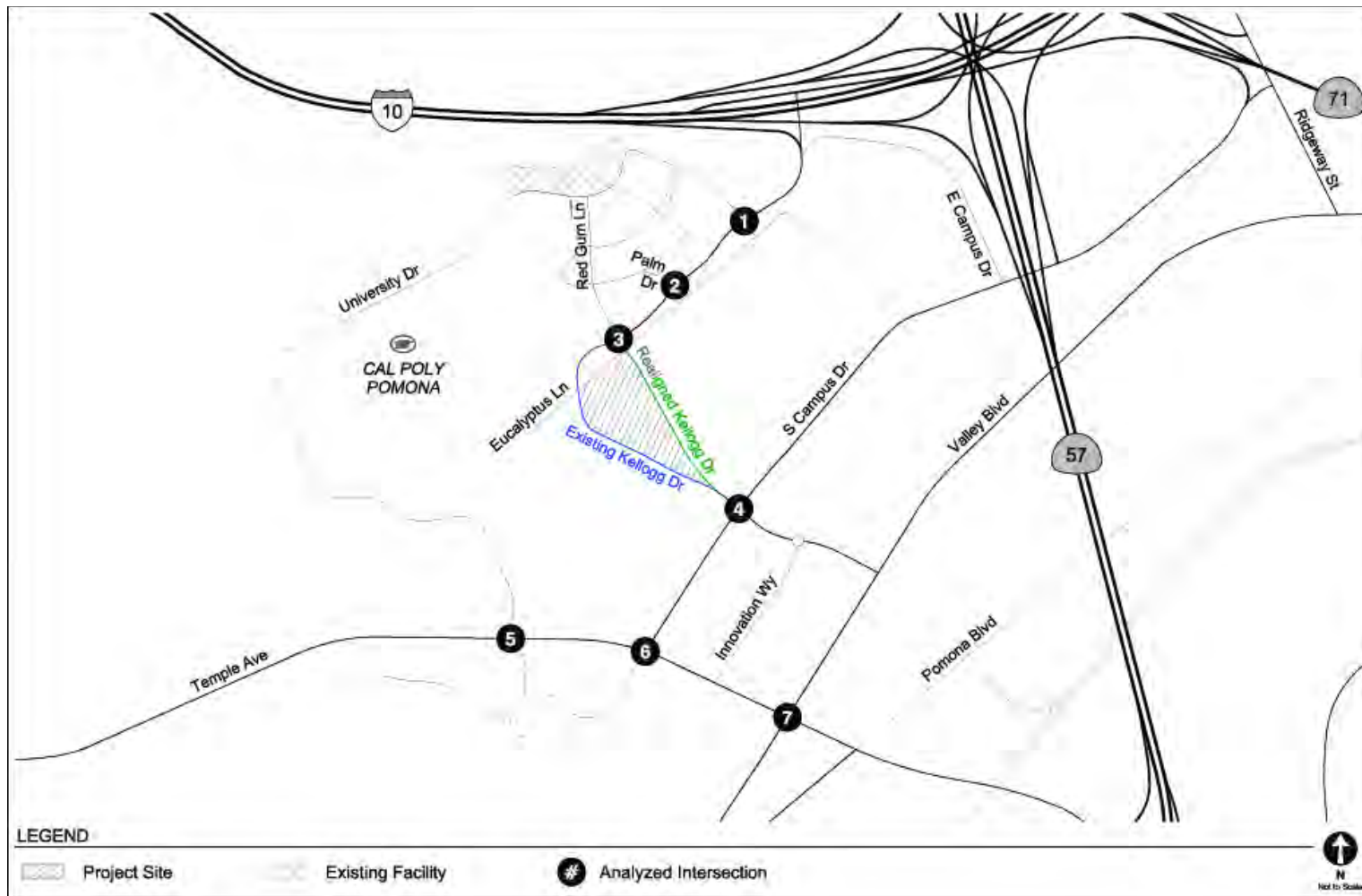


Table 2
Existing Conditions (Year 2016)
Intersection Peak Hour Level of Service

No.	Intersection	Peak Hour	Existing	
			Delay (sec.)	LOS
1	Kellogg Drive & University Drive [a] [b]	A.M. P.M.	46.7 155.0	E F
2	Kellogg Drive & Palm Drive	A.M. P.M.	5.5 12.1	A B
3	Kellogg Drive & Red Gum Lane	A.M. P.M.	44.7 43.5	D D
4	South Campus Drive & Kellogg Drive	A.M. P.M.	47.3 19.2	D B
5	University Drive & Temple Avenue [b]	A.M. P.M.	57.2 48.9	E D
6	South Campus Drive & Temple Avenue [b]	A.M. P.M.	79.5 52.8	E D
7	Valley Boulevard & Temple Avenue [b]	A.M. P.M.	46.8 32.9	D C

Notes:

Delay is measured in seconds (using HCM based Synchro)

[a] Unsignalized intersection under Existing Conditions.

[b] Future improvements are expected to be implement at Intersections 1, 5, 6, and 7.

As shown, four of the seven study intersections currently operate at LOS D or better during both the morning and afternoon peak hours. The following study intersections operate at LOS E or LOS F during either the morning or evening peak hours:

- Kellogg Drive & University Drive – LOS E during AM peak hour; LOS F during PM peak hour
- University Drive & Temple Avenue – LOS E during AM peak hour
- South Campus Drive & Temple Avenue – LOS E during AM peak hour

Impact Criteria

Per the California State University's guidelines, determination of project traffic impacts is based on the change in LOS for the affected intersection as follows:

- A roadway segment or intersection operates at LOS D or better under a no project scenario and the addition of project trips causes overall traffic operations on the facility to operate at LOS E or F.

- A roadway segment or intersection operates at LOS E or F under a no project scenario and the project adds both ten or more peak hour trips and five seconds or more of peak hour delay, during the same peak hour.
- If an intersection operates at a very poor LOS F (control delay of 120 second or more), the significance criterion shall be an increase in v/c ratio of 0.02 or more.

Congestion Management Program (CMP)

Analysis was also conducted according to the guidelines in *2010 Congestion Management Program for Los Angeles County* (Los Angeles County Metropolitan Transportation Authority [Metro], 2010) (CMP). The CMP is a State-mandated program that serves as the monitoring and analytical basis for transportation funding decisions in the County made through the Regional Transportation Improvement Program (RTIP) and State Transportation Improvement Program (STIP) processes. The CMP requires that a traffic impact analysis (TIA) be performed for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the morning or evening weekday peak hours and all mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the morning or evening weekday peak hours. Additionally, it requires a review of potential impacts to the regional transit system.

The CMP freeway monitoring locations that provide regional access to the project site include:

- I-210 at San Dimas Avenue, San Dimas, CA
- I-210 east of Indian Hill Boulevard, Claremont, CA
- I-10 at Grand Avenue, Covina, CA
- I-10 at Dudley Street, Pomona, CA
- I-10 at Indian Hill Boulevard, Claremont, CA
- SR 57 south of the junction of I-10, SR 71, and I-210, Pomona, CA
- SR 60 at Brea Canyon Road, Diamond Bar, CA
- SR 60 east of SR 57, Diamond Bar, CA

The only CMP arterial monitoring station closest to the project site is the intersection of:

- SR 71 & Mission Boulevard, approximately 3 miles east of the project site

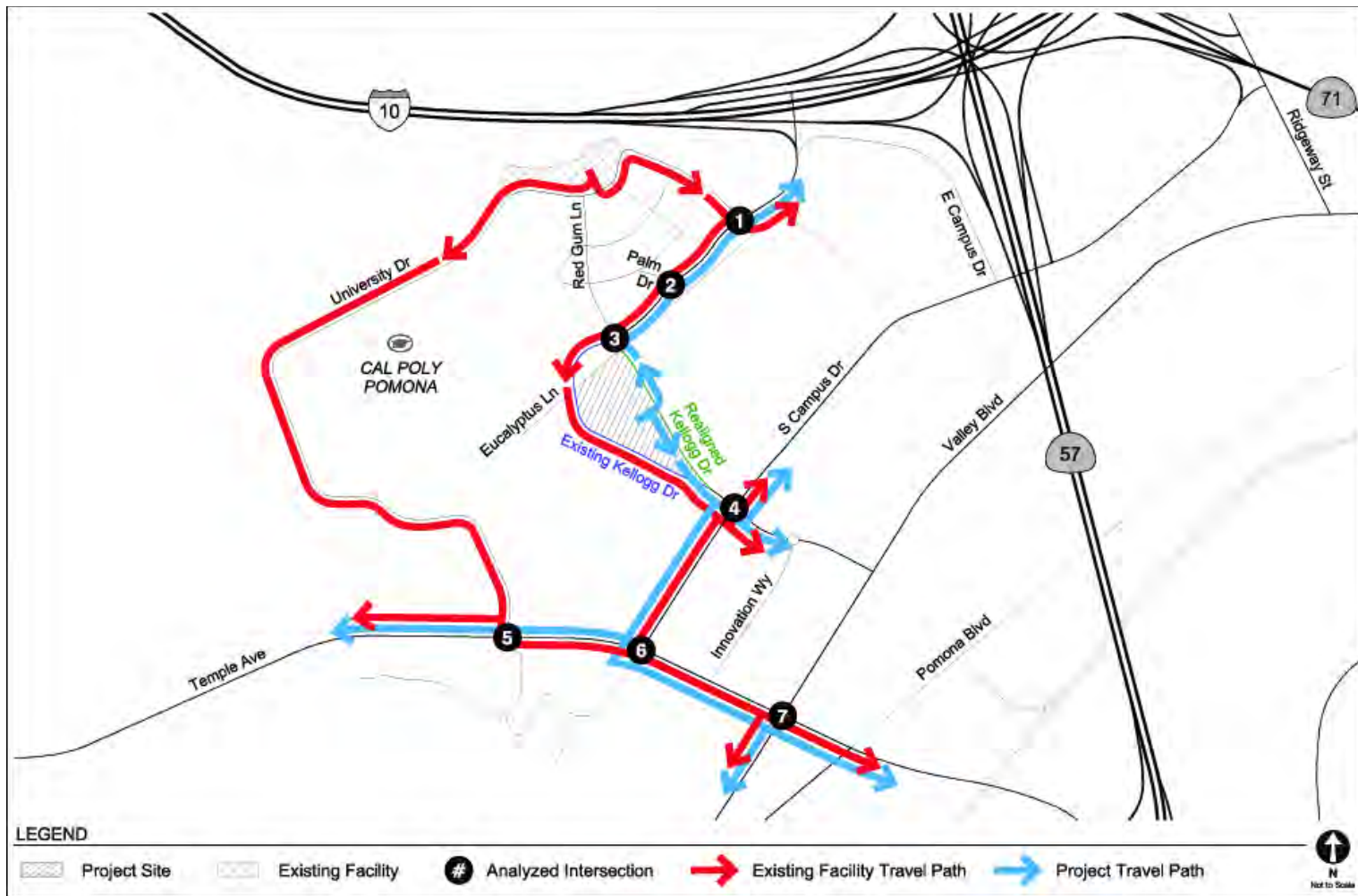
Environmental Impact

The project includes shifting the segment of Kellogg Drive between Red Gum Lane and South Campus Drive eastward, placing it along the eastern boundary of the project site and separating the project site from the horse pasture to the east. This shift will modify the intersection of Red Gum Lane and Kellogg Drive, eliminating the west leg and extending the south leg. As a result, the traffic approach volumes at this intersection will change

accordingly, as illustrated in Figure 5. The existing lane configurations will be maintained at the intersection of South Campus Drive & Kellogg Drive.

The evaluation of the project impacts includes evaluating vehicular traffic conditions under both existing and future conditions without the project, and then adding to those conditions project trips onto the roadway network, including the shifted segment of Kellogg Drive, within the study area.

Kellogg Drive Shift
Figure 5



Project Trip Generation

The project involves replacing existing student housing facilities that consist of approximately 1,400 beds. The project facilities will provide approximately 1,645 beds, or 245 beds more than the existing facilities. To calculate the increase in traffic volumes, a trip generation rate for the existing student housing was developed and then applied to the project. Once the trips for each location were established, a determination of the net increase in trips due to provision of additional student beds was made.

The trip generation rate was initially applied to the existing facility (1,400 beds) located at the north end of the campus. This same rate was applied to the project facilities (1,645 beds). Since traffic from the existing student housing facilities is already included in the base traffic counts, the net increase in traffic from the 245 beds is analyzed as these are considered new trips to the area.

As shown in Table 3, the project is estimated to generate 300 net new daily trips, including 13 net trips (6 inbound trips and 7 outbound trips) during the morning peak hour and 28 net trips (15 inbound trips and 13 outbound trips) during the evening peak hour.

**Table 3
Trip Generation Summary**

Trip Generation Rates								
Land Use	Size	Daily	AM Peak Hour			AM Peak Hour		
			Inbound	Outbound	Total	Inbound	Outbound	Total
Student Housing [a]	per parking space	2.00	47%	53%	0.09	54%	46%	0.19

Trip Generation Estimates [b]								
Land Use	Size	Daily	AM Peak Hour			PM Peak Hour		
			Inbound	Outbound	Total	Inbound	Outbound	Total
Existing Use Student Housing - 1,400 beds	350 parking spaces	700	15	17	32	36	31	67
Proposed Project Student Housing - 1,645 beds	500 parking spaces	1,000	21	24	45	51	44	95
Net New Project Trips		300	6	7	13	15	13	28

Notes:

[a] Trip generation for the student housing portion of the Project is based on the assumption that each vehicle will make two trips per day (one outbound and one inbound trip).

The AM and PM rates and inbound/outbound splits are based on a ratio of the information provided in Technical Memorandum Re: Trip Generation Study - Private Student Housing Apartments, Spack Consulting, 2012.

[b] Trip generation estimates are presented in terms of one-way trips. This means that each trip, whether leaving the Project Site or returning, is counted separately as one trip.

Existing Plus Project Conditions

Forecasted project-only traffic volumes were added to existing conditions on the existing roadway network. The Existing Plus Project intersection operating conditions for typical weekday AM and PM peak hours were studied at the 7 study intersections. Four of the study intersections are projected to operate at LOS D or better during both the AM and PM peak hours.

The following three intersections are anticipated to operate at LOS E or F during either the AM and/or PM peak hour:

- Kellogg Drive & University Drive – LOS F during both the AM and PM peak hours
- University Drive & Temple Avenue – LOS E during the AM peak hour
- South Campus Drive & Temple Avenue – LOS F during the AM peak hour

As summarized in Table 4, the project is not anticipated to result in significant impacts at any of the study intersections under the Existing Plus Project conditions.

Table 4
Existing Plus Project Conditions
Intersection Peak Hour Level of Service

No.	Intersection	Peak Hour	Existing			Existing Plus Project			Change in Delay (sec)	Change in V/C	Net Project Trips	Impact [b]
			Delay (sec.)	LOS	V/C [a]	Delay (sec.)	LOS	V/C [a]				
1	Kellogg Drive & University Drive [c] [d]	A.M.	46.7	E	0.787	54.4	F	0.806	7.7	0.019	-21	NO
		P.M.	155.0	F	0.749	162.0	F	0.756	7.0	0.007	-42	NO
2	Kellogg Drive & Palm Drive	A.M.	5.5	A	N/A	5.8	A	N/A	0.3	N/A	-14	NO
		P.M.	12.1	B	N/A	11.6	B	N/A	-0.5	N/A	-29	NO
3	Kellogg Drive & Red Gum Lane	A.M.	44.7	D	N/A	5.3	A	N/A	-39.4	N/A	-15	NO
		P.M.	43.5	D	N/A	8.5	A	N/A	-35.0	N/A	-29	NO
4	South Campus Drive & Kellogg Drive	A.M.	47.3	D	N/A	47.9	D	N/A	0.6	N/A	17	NO
		P.M.	19.2	B	N/A	19.5	B	N/A	0.3	N/A	38	NO
5	University Drive & Temple Avenue [d]	A.M.	57.2	E	N/A	57.2	E	N/A	0.0	N/A	-2	NO
		P.M.	48.9	D	N/A	49.3	D	N/A	0.4	N/A	-2	NO
6	South Campus Drive & Temple Avenue [d]	A.M.	79.5	E	N/A	81.9	F	N/A	2.4	N/A	9	NO
		P.M.	52.8	D	N/A	53.6	D	N/A	0.8	N/A	21	NO
7	Valley Boulevard & Temple Avenue [d]	A.M.	46.8	D	N/A	40.6	D	N/A	-6.2	N/A	13	NO
		P.M.	32.9	C	N/A	33.2	C	N/A	0.3	N/A	16	NO

Notes:

Delay is measured in seconds (using HCM based Synchro)

[a] Presented only for the intersections that operate at a very poor LOS F (delay of 120 second or more) during either peak hour. Per the CSU guidelines, an intersection that operates with a delay of more than 120 seconds maybe be significantly impacted if the V/C ratio increases by 0.02 or more.

[b] Significant impact analysis is based on the CSU criteria.

[c] Unsignalized intersection under Existing Conditions.

[d] Future improvements are expected to be implement at Intersections 1, 5, 6, and 7.

N/A = Not applicable to this intersection

Future Without Project Conditions (Year 2022)

Ambient Traffic Growth: Existing traffic is expected to increase over time as a result of regional growth and development. Based on the City of Pomona guidelines, an ambient growth factor of 2.0% per year was used to adjust the existing traffic volumes to the full project's projected occupancy year of 2022. The total adjustment applied over the six-year period to full buildout of the project was, therefore, 12.0%.

Related Projects: Considering the relatively isolated location of the Cal Poly Pomona campus, the related projects are those at the campus, the Parking Structure 2 and the Innovation Village V that are both planned for completion in 2016. Other potential developments are too distant from the project to add substantially to the potential cumulative effects of related projects that are accounted for in the 12% increase in ambient growth applied over the six-year period, based on the City of Pomona's guidelines.

Roadway Improvements: The following roadway improvements have been completed or will be completed prior to the opening of the project facilities and are included as part of the future conditions analyses:

- Intersection #1 – Kellogg Drive & University Drive: Installation of a traffic signal.
- Intersection #5 – University Drive & Temple Avenue: Conversion of the westbound right-turn lane into a free-flow right-turn lane.
- Intersection #6 – South Campus Drive & Temple Avenue: Addition of a southbound right-turn lane on South Campus Drive, and addition of an eastbound left-turn lane on Temple Avenue.
- Intersection #7 – Valley Boulevard & Temple Avenue: Conversion of one of the existing southbound through lanes into a shared through/right-turn lane.

The projected Future Without Project intersection operating conditions for the weekday morning and afternoon peak hours are summarized in Table 5. As shown, two of the seven study intersections will operate at LOS D or better during both the AM and PM peak hours. Five of the study intersections are projected to operate at LOS E or F during either the AM or PM peak hour or both:

- Kellogg Drive & University Drive – LOS F during PM peak hour
- Kellogg Drive & Red Gum Lane – LOS F during AM peak hour; LOS E during PM peak hour
- South Campus Drive & Kellogg Drive – LOS E during the AM peak hour
- University Drive & Temple Avenue – LOS E during AM peak hour; LOS F during the PM peak hour
- South Campus Drive & Temple Avenue – LOS F during AM peak hour; LOS E during the PM peak hour

**Table 5
Future Without Project Conditions (Year 2022)
Intersection Peak Hour Level of Service**

No.	Intersection	Peak Hour	Future Without Project	
			Delay (sec.)	LOS
1	Kellogg Drive & University Drive [a] [b]	A.M.	19.2	B
		P.M.	84.7	F
2	Kellogg Drive & Palm Drive	A.M.	6.6	A
		P.M.	27.6	C
3	Kellogg Drive & Red Gum Lane	A.M.	83.0	F
		P.M.	76.9	E
4	South Campus Drive & Kellogg Drive	A.M.	55.7	E
		P.M.	22.4	C
5	University Drive & Temple Avenue [b]	A.M.	79.7	E
		P.M.	88.2	F
6	South Campus Drive & Temple Avenue [b]	A.M.	87.4	F
		P.M.	58.3	E
7	Valley Boulevard & Temple Avenue [b]	A.M.	49.0	D
		P.M.	52.6	D

Notes:

Delay is measured in seconds (using HCM based Synchro)

[a] Unsignalized intersection under Existing Conditions, signalized under Future Conditions

[b] Future improvements are expected to be implement at Intersections 1, 5, 6, and 7.

Future Plus Project Conditions (Year 2022)

Future Plus Project conditions are estimated based on traffic volumes, roadways, and intersection configurations in the year 2022 following the project's completion. As shown in Table 6, three of the seven study intersections are projected to operate at LOS D or better during both the AM and PM peak hours. The following four intersections which are projected to operate at LOS E or F under Future Without Project conditions, are anticipated to continue to operate at LOS E or F during either the AM or PM peak hour or both:

- Kellogg Drive & University Drive – LOS F during the PM peak hour
- South Campus Drive & Kellogg Drive – LOS E during the AM peak hour
- University Drive & Temple Avenue – LOS E during the AM peak hour; LOS F during the PM peak hour
- South Campus Drive & Temple Avenue – LOS F during the AM peak hour; LOS E during the PM peak hour

Based on the significance criteria, the project is not anticipated to result in significant impacts at any of the study intersections under the Future Plus Project conditions.

**Table 6
Future Plus Project Conditions (Year 2022)
Intersection Peak Hour Level of Service**

No.	Intersection	Peak Hour	Future Without Project			Future With Project			Change in Delay (sec)	Change in V/C	Net Project Trips	Impact [b]
			Delay (sec.)	LOS	V/C [a]	Delay (sec.)	LOS	V/C [a]				
1	Kellogg Drive & University Drive [c] [d]	A.M.	19.2	B	N/A	38.2	D	N/A	19.0	N/A	-21	NO
		P.M.	84.7	F	N/A	96.2	F	N/A	11.5	N/A	-42	NO
2	Kellogg Drive & Palm Drive	A.M.	6.6	A	N/A	5.8	A	N/A	-0.8	N/A	-14	NO
		P.M.	27.6	C	N/A	26.9	C	N/A	-0.7	N/A	-29	NO
3	Kellogg Drive & Red Gum Lane	A.M.	83.0	F	N/A	5.9	A	N/A	-77.1	N/A	-15	NO
		P.M.	76.9	E	N/A	11.0	B	N/A	-65.9	N/A	-29	NO
4	South Campus Drive & Kellogg Drive	A.M.	55.7	E	N/A	56.6	E	N/A	0.6	N/A	17	NO
		P.M.	22.4	C	N/A	23.3	C	N/A	0.9	N/A	38	NO
5	University Drive & Temple Avenue [d]	A.M.	79.7	E	N/A	79.7	E	N/A	0.0	N/A	-2	NO
		P.M.	88.2	F	N/A	86.4	F	N/A	-1.8	N/A	-2	NO
6	South Campus Drive & Temple Avenue [d]	A.M.	87.4	F	N/A	87.6	F	N/A	0.2	N/A	9	NO
		P.M.	58.3	E	N/A	58.8	E	N/A	0.5	N/A	21	NO
7	Valley Boulevard & Temple Avenue [d]	A.M.	49.0	D	N/A	49.3	D	N/A	0.3	N/A	13	NO
		P.M.	52.6	D	N/A	53.3	D	N/A	0.7	N/A	16	NO

Delay is measured in seconds (using HCM based Synchro)

[a] Presented only for the intersections that operate at a very poor LOS F (delay of 120 second or more) during either peak hour. Per the CSU guidelines, an intersection that operates with a delay of more than 120 seconds may be significantly impacted if the V/C ratio increases by 0.02 or more.

[b] Significant impact analysis is based on the CSU criteria.

[c] Unsignalized intersection under Existing Conditions.

[d] Future improvements are expected to be implement at Intersections 1, 5, 6, and 7.

N/A = Not applicable to this intersection

Vehicle Miles Traveled (VMTs)

The project provides replacement for an existing student housing facility with 1,400 beds at a new location with a facility with 1,645 beds. The VMTs for the portion of the existing facility being replaced (1,400 beds) will not change with the project and the additional 245 beds will actually reduce VMTs by providing housing on campus for the students of Cal Poly Pomona.

The average one-way commute to the University by a student is approximately 13 miles. Thus, the VMTs will be significantly reduced by accommodating students on campus. By reducing the current VMT distance of 26-mile round trips for each student and bringing additional 245 student to on-campus housing, the project is reducing the home-to-school VMTs by approximately 6,370 miles per day. However, to account for trips made by resident students to local establishments, this VMTs reduction is adjusted to account for

additional local trips generated by the students at the replacement student housing facility. As indicated in Table 3, the project is expected to generate 300 additional local daily trips. Using average trip length of eight miles for local trips, the VMT generated is approximately 2,400 miles. Therefore, the project will result in a net reduction of approximately 3,970 VMTs, which will have a beneficial effect of reducing vehicular travel on the street system surrounding the project.

Transit

The CMP provides a methodology for estimating the number of transit trips expected to result from a project based on the number of vehicle trips. This methodology assumes average vehicle occupancy (AVO) factor of 1.4 in order to estimate the number of person trips to and from the project. Additionally, the methodology states that 3.5% of the total person trips will typically use transit for most projects. Using this methodology, the project is anticipated to result in less than one transit trip in the morning peak hour and one transit trip in the evening peak hour. The project location is well served by numerous established transit routes and these trips are spread across the commuter network. With approximately 14 buses during the morning peak hour serving the Cal Poly Pomona campus adjacent to the project site, the project will result in an average increase of less than one transit trip per bus during both peak hours.

Additionally, Cal Poly Pomona provides a free shuttle that circulates around the campus (Bronco Express) and any transit trips to the opposite side of the campus are expected to be conducted on these shuttles. Thus, the existing service in the vicinity will adequately accommodate the project-generated transit trips during the morning peak hour and is not anticipated to have a significant impact on the transit system during either the morning or evening peak hour. Therefore, impacts on existing and future transit services in the project vicinity are expected to be less than significant. The study area will continue to be served by the existing bus lines that provide adequate transit service with the projected addition of transit ridership and can accommodate the future demand.

Pedestrians and Bicycles

The project will result in increased pedestrian activity on existing pathways and sidewalks between the project site and other campus facilities, but will not result in significant impacts. No changes to the bicycle facilities or routes will occur due the project, and therefore the project will not result in impact to the bicycle facilities.

Freeways and Arterials

Based on project trip generation and distribution, the proposed project is expected to add fewer than 150 peak hour trips distributed to the freeways in the area, and fewer than 50

peak hour trips to arterials in the area (thresholds set by the Congestion Management Program). Therefore, impact is considered to be less than significant, and no further analysis is required.

Mitigation Measures

Based on the traffic impact analyses conducted, the student housing replacement project is not anticipated to result in a significant impact. Therefore, no mitigation is required.

3.2 Air Quality and Greenhouse Gases (GHG)

This section examines the potential long-term air quality impacts, including GHG, associated with the planned development of the Student Housing Replacement project. Short-term impacts from construction of the project are discussed in Section 3.7, Construction Effects.

Environmental Setting

The Student Housing Replacement project is located within the South Coast Air Basin. The Basin continues to exceed Federal and State ambient air quality standards for ozone (O₃), particulate matter (PM_{2.5} and PM₁₀), and lead (Pb).

Air Pollution Control Efforts

Both the federal and state governments have set health-based ambient air quality standards for the following 6 pollutants:

- Sulfur dioxide (SO₂)
- Lead (Pb)
- Carbon monoxide (CO)
- Fine particulate matter (PM₁₀)
- Ultrafine particulate matter (PM_{2.5})
- Nitrogen dioxide (NO₂)
- Ozone (O₃)

Standards for these pollutants have been designed to protect the most sensitive persons from illness or discomfort with a margin of safety. The California standards are more stringent than federal standards, especially in the case of PM₁₀ and SO₂.

Table 7 outlines current federal and state ambient air quality standards, and sources and health effects of these pollutants. Additional information about health effects associated with each pollutant is provided in the South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook, which is hereby incorporated by reference.

Table 7
Air Pollution Standards, Sources, and Effects

Air Pollutant	State Standards	National Standards (Primary)	Sources	Health Effect
Ozone (O ₃)	0.07 ppm, 8-hr. avg. 0.09 ppm, 1-hr. avg.	0.070 ppm, 8-hr. avg.	Atmospheric reaction of organic gases with nitrogen oxides in sunlight	Aggravation of respiratory and cardiovascular diseases, irritation of eyes, impairment of cardiopulmonary function, plant leaf injury.
Respirable Particulate Matter (PM ₁₀)	50 µg/m ³ , 24-hr. avg. 20 µg/m ³ , AAM	150 µg/m ³ , 24-hr. avg.	Stationary combustion of solid fuels, construction activities, industrial processes, industrial chemical reactions	Reduced lung function, aggravation of the effects of gaseous pollutants, aggravation of respiratory and cardio-respiratory diseases, increased coughing and chest discomfort, soiling, reduced visibility.
Particulate Matter less than 2.5 Microns in Diameter (PM _{2.5})	12 µg/m ³ , AAM	35 µg/m ³ , 24-hr. avg. 12 µg/m ³ , AAM	Combustion from mobile and stationary sources, atmospheric chemical reactions	Health problems, including asthma, bronchitis, acute and chronic respiratory symptoms such as shortness of breath and painful breathing, and premature deaths.
Carbon Monoxide (CO)	9.0 ppm, 8-hr. avg. 20 ppm, 1-hr. avg.	9 ppm, 8-hr. avg. 35 ppm, 1-hr. avg.	Incomplete combustion of fuels and other carbon-containing substances such as motor vehicle exhaust, natural events, such as decomposition of organic matter.	Reduced tolerance for exercise, impairment of mental function, impairment of fetal development, death at high levels of exposure, aggravation of some heart diseases (angina).
Nitrogen Dioxide (NO ₂)	0.18 ppm, 1-hr. avg. 0.03 ppm, AAM	0.10 ppm, 1-hr. avg. 0.053 ppm, AAM	Motor vehicle exhaust, high-temperature stationary combustion, atmospheric reactions.	Aggravation of respiratory illness, reduced visibility, reduced plant growth, formation of acid rain.
Sulfur Dioxide (SO ₂)	0.04 ppm, 24-hr. avg. 0.25 ppm 1-hr. avg.	0.03 ppm, AAM 0.14 ppm, 24-hr. avg. 75 ppb, 1-hr. avg.	Combustion of sulfur-containing fossil fuels, smelting of sulfur-bearing metal ores, industrial processes.	Aggravation of respiratory diseases (asthma, emphysema), reduced lung function, irritation of eyes, reduced visibility, plant injury, deterioration of metals, textiles, leather, finishes, coating, etc.
Lead (Pb)	1.5 µg/m ³ , 30 day avg.	0.15 µg/m ³ , calendar quarter	Contaminated soil	Increased body burden, impairment of blood formation and nerve conduction.
Visibility-Reducing Particles	Extinction coefficient of 0.23 per km, visibility of 10 miles or more due to particles when relative humidity is less than 70%.	No Federal Standards		Visibility impairment on days when relative humidity is less than 70%.

Note: ppm = parts per million by volume µg/m³ = micrograms per cubic meter
AAM = annual arithmetic mean

Source: California Air Resources Board, <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>.

Monitored Air Quality

The South Coast Air Quality Management District (SCAQMD) monitors air quality throughout the Basin at various locations. Monitoring station at 924 N. Garey Avenue in Pomona reports data most descriptive of conditions at the Student Housing Replacement project site.

Table 8 summarizes the number of days State and/or federal ozone standards were exceeded at the monitoring station.

Table 8
Federal and State Ground-level Ozone Exceedances in Pomona/Walnut Valley

	2015	2014	2013	2012	2011	2010	2009
State 1-hour Ozone	8	22	12	21	15	9	25
Federal 1-hour Ozone	-	-	1	0	0	0	1
Federal 8-hour Ozone	10	33	15	15	16	4	23

Existing Air Pollutant Emissions

The operational air pollutant emissions associated with the existing student housing that will be replaced by the project are summarized in Table 10.

Impact Criteria

The South Coast Air Quality Management District (SCAQMD) has established thresholds for certain criteria pollutants for projects within the South Coast Air Basin SCAQMD considers projects in the South Coast Air Basin that exceed any of these emission thresholds to have a significant air quality impact. Thresholds for operation-related emissions are shown in Table 9.

Table 9
SCAQMD Long Term Operational Thresholds

Criteria Pollutant	Pounds per Day
Reactive Organic Gases (ROG)	55
Oxides of Nitrogen (NO _x)	55
Fine Particulate Matter (PM ₁₀)	150
Ultrafine Particulate Matter (PM _{2.5})	55

The SCAQMD adopted a “Policy on Global Warming and Stratospheric Ozone Depletion” in 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and

in drafting revisions to the Air Quality Management Plan. In 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy.

In 2008, the SCAQMD Governing Board adopted an interim greenhouse gas (GHG) significance threshold for stationary source/industrial projects where the SCAQMD is the lead agency. However, SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds¹ and provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members of the working group include government agencies implementing CEQA and representatives from various stakeholder groups. The working group is currently discussing multiple methodologies for determining project significance. These methodologies include categorical exemptions, consistency with regional GHG budgets in approved plans, a numerical threshold, performance standards, and emissions offsets. Also, the State Office of Planning and Research (OPR) is currently developing a Technical Advisory to provide guidance on specific topics related to climate action planning and the use of plans for the reduction of greenhouse gases in a CEQA analysis.

Environmental Impact

The Student Housing Replacement project consists of student housing with 1,645 beds, a dining facility, and associated surface parking. The project will replace the existing student housing facilities, which currently provide 1,400 student beds and a dining facility, which currently generate operational air pollutant emissions. The new student residence facilities will replace 1,400 beds in existing student residence halls, as well as provide 245 additional beds on campus. To estimate project's long-term operational emissions, the difference in emissions generated by the existing student housing facilities and the emissions generated by the project's student housing replacement facilities was calculated and is summarized in Table 10. A "worst-case" scenario is used to analyze these long-term air quality impacts. Area ROG and NO_x emissions are calculated for both winter and summer using the CalEEMod model, with the higher emissions estimate reported. GHG (CO₂e) emissions are calculated on an annual basis using the CalEEMod model. Vehicular ROG and NO_x emissions by VMT were calculated using California Air Resource Board per-mile formulas; GHG emissions by VMT were calculated using EPA per-mile formulas.

¹South Coast Air Quality Management District, Greenhouse Gases CEQA Significance Thresholds, <http://www.aqmd.gov/ceqa/handbook/GHG/GHG.html>.

Table 10
Project Operational Emissions, Year 2022

	Reactive Organic Gases (ROG) pounds/day	Oxides of Nitrogen (NO_x) pounds/day	Carbon Monoxide (CO) pounds/day	Fine Particulate Matter (PM₁₀) pounds/day	Ultrafine Particulate Matter (PM_{2.5}) pounds/day	GHG (CO_{2e}) metric tons/year
Existing Student Housing						
Area Sources	13	neg.	40	neg.	neg.	-
Energy	neg.	3	2	neg.	neg.	-
Vehicular Emissions	4	9	38	8	2	-
<i>Subtotal</i>	17	12	80	8	2	3,800
Student Housing Replacement Project						
Area Sources	15	1	47	neg.	neg.	-
Energy	neg.	4	2	neg.	neg.	-
Vehicular Emissions	3	6	26	6	2	-
<i>Subtotal</i>	18	11	75	6	2	3,470
VMT Reduction *	-9 ⁺	-6	-82	-neg.	-neg.	-394
<i>Subtotal</i>	9	5	-7	6	2	3,076
Total Project's Net Emissions						
Project Emissions minus Existing Student Housing Emissions	-8	-7	-87	-2	0	-724
SCAQMD Threshold	55	55	550	150	55	-
Exceeds Threshold?	No	No	No	No	No	-

* Vehicular emissions reduction is calculated by applying EPA Emission Factors (per mile) for each pollutant and for GHG to VMT reductions resulting from the provision of student housing at the site.

⁺ Calculation based on EPA Emission Factors (per mile) for VOC.

Vehicular trips are the primary source of long-term pollutant emissions at the existing student housing and the project's replacement student housing facilities. However, as discussed in Section 3.1, Traffic and Circulation, it is estimated that the provision of additional 245 beds in the replacement facilities will result in a reduction of approximately 3,970 vehicle miles traveled (VMTs) per day from commute trips. Using the EPA emission calculation of 0.81 pound of CO₂ per mile, this translates to a reduction of 1.5 metric tons of CO_{2e} per day, or 394 metric tons per year that will result from the elimination of these commute trips. Similarly, the reduction in commute trips will result in reduction in ROG and NO_x emissions. The emissions reduction associated with the reduction in VMT is shown in Table 10, under "VMT Reduction".

The area source emissions are primarily emissions associated with the use of energy for heating and cooling of the new facilities on campus. These emissions are anticipated to be substantially lower in comparison with the “worst case” estimates summarized in Table 10 since the new facilities will be equipped with energy-efficient cooling and heating systems, lighting systems, equipment, and appliances. The energy consumption will be further reduced by utilizing renewable energy sources for electricity, since the University obtains more than 15% of its electricity from renewable sources. In addition, the incorporation of the following features into the project’s design and operations to the extent feasible will further reduce stationary emissions and GHG: incorporating trees into landscaping to provide shade and shadow to buildings to aid in CO₂ absorption; installing solar panels on roofs to supply electricity for air conditioning; using light-colored roofing materials to deflect heat from buildings; using double-paned glass in windows to reduce thermal loss in buildings; and using energy-efficient lights in parking areas, such as low pressure sodium or metal halide.

As indicated in Table 10, the Student Housing Replacement project’s net emissions will be less than the existing emissions of ROG, NO_x, CO, PM₁₀, PM_{2.5} and GHG generated by the student housing facilities that are being replaced by the project. Since the project will reduce air pollutant and GHG emissions, impact is considered to be beneficial; no adverse impact will result.

Mitigation Measures

Impact will be beneficial and no mitigation is required.

Level of Impact After Mitigation

Impact will be beneficial and no mitigation is required.

3.3 Fire and Police Protection Services

Environmental Setting

Fire Protection

The Los Angeles County Fire Department (LACFD) provides fire protection services for the campus, including the project site. The fire station closest to the site is Fire Station No. 187, located at 3325 West Temple Avenue, approximately one mile southeast of the site. Other fire stations in the vicinity include Fire Stations No. 146, 141, and 184.

Police Protection

The University Police Department provides police protection services for the campus, including the project site. Its headquarters is located in Building 109 of the main campus at Cypress and Oak Lane. The University Police Department is responsible for coordination of the emergency management needs of the campus, including coordination with the City of Pomona Police Department and the County Sheriff's Department. The University Police Department provides a number of services to the campus community, including:

- 24-hour patrol of the university campus and surrounding area
- 24-hour public safety/university police dispatch center
- Investigations
- Crime prevention
- Campus outreach
- Special event security
- Crowd and traffic control
- Live scan fingerprinting services for various licensing and certification programs
- Alarm monitoring and response
- Lost and found property management
- Crisis planning/emergency preparedness
- Community service officer program

Impact Criteria

Impact on police and/or fire protection services will be significant if the project will require construction of new facilities or expansion of existing facilities, the construction of which

would result in significant adverse effects, in order to maintain acceptable service ratios, response times, and other performance objectives.

Environmental Impact

Fire Protection

The Los Angeles County Fire Department will continue to provide services to the project site. Fire protection and paramedic service will continue to be provided by Fire Station 187, located at 3325 West Temple Avenue in Pomona. The station is located approximately one mile from the project site, with an estimated response time of 3 minutes. If needed, other fire stations in the vicinity will also provide support.

Fire safety is a priority consideration in the design and construction of new facilities, and therefore construction of the student replacement facilities at the site will involve ongoing consultation with the Fire Marshal and University fire officials to ensure that all code requirements are met. All required fire safety features will be incorporated in the new student residence halls in compliance with existing requirements, including smoke detectors and full sprinkler systems. In compliance with existing requirements, all necessary fire lines and hydrants with appropriate fire flows will be provided; unobstructed fire emergency access to the buildings will be provided from existing streets and new internal streets with fire access roads at the perimeter of the site; and all other features required by the Fire Department that will minimize fire hazard potential will be provided in the new facilities. All fire equipment will be maintained in accordance with State and local regulations, and will be inspected on a regular schedule and re-charged, repaired, or replaced as needed. If a fire situation is identified, University Police will institute an emergency response and contact the LACFD, if necessary.

As the project provides replacement facilities for existing student housing that will be removed and only provides for 264 new beds in the replacement facilities, its contribution to an incremental increase in demand for fire protection services will be minimal. In addition, with implementation of all these fire safety measures, the project will not result in the need for new fire protection facilities the construction of which would result in significant adverse effects. Therefore, impact is considered less than significant.

Police Protection

The University Police will continue to provide police protection services to the site. University Police also have mutual aid agreements and cooperate fully with local and state law enforcement agencies, including the City of Pomona Police Department and the Los Angeles County Sheriff's Department.

Before the new student housing replacement facilities are occupied, the University Police Department will review lighting and landscaping plans, traffic ingress/egress plans, and project plans for each facility. Lighting plans will be evaluated for effective building exterior and parking areas lighting. Landscaping plans will be reviewed to ensure that hiding or concealment places are minimized. The site plans will be reviewed to ensure that adequate ingress/egress for police vehicles is provided. Security plans for individual buildings on the site will be developed and implemented in conjunction with the consultation of the University Police Department. The University Police Department recommendations resulting from these reviews will be incorporated in the new facilities. The new student residence buildings will be incorporated into the University's security and emergency response plans to ensure appropriate emergency response.

As the project provides replacement facilities for existing student housing that will be removed and only provides for 245 new student beds in the replacement facilities, its contribution to an incremental increase in demand for the University Police Department services will be nominal. In addition, this nominal increase will be further minimized through implementation of safety and security measures in the new facilities. Therefore, no major new local or regional facilities will be required, the construction of which would result in significant adverse effects, and impact is considered less than significant.

Mitigation Measures

With compliance with existing regulations and requirements, impact will be less than significant, and no additional mitigation is required.

Level of Impact After Mitigation

With compliance with existing regulations and requirements, impact will be less than significant, and no additional mitigation is required.

3.4 Utilities and Service Systems, Hydrology and Water Quality

This section addresses the impact of the Student Housing Replacement project on public utility infrastructure and services, including stormwater quality and drainage patterns.

Environmental Setting

Water

Currently, the project site is served by two existing domestic water lines, as well as by two existing recycled water lines (see Figure 6) that provide water for the site, which is currently used for a horse pasture. Two existing water lines, a 39-inch Metropolitan Water District’s line and a 42-inch Three Valleys Municipal Water District’s line located along Eucalyptus Lane, traverse the western portion of the site within an existing easement.

The existing student housing that will be replaced by the project currently uses approximately 12,212 gallons of water per day, as summarized in Table 11.

**Table 11
Existing Student Housing Estimated Water Use
(gallons per day)**

Facility	Water Use Rate	Existing Student Housing	Existing Water Use (gpd)
Student Housing	8 gpd/student	1,411 students	11,288
Dining Commons	33 gpd/1,000 sf	28,000 sf	924
Total			12,212

Sewer

The project site is served by an existing sewer line which traverses through the southern portion of the site sloping from northwest to southeast parallel to the existing Kellogg Drive alignment (see Figure 7). As the site is currently used for horse pasture, very little wastewater is presently generated at the site.

The existing student housing that will be replaced by the project currently generates approximately 11,601 gallons of wastewater per day (based on a factor of 95% of used water becoming wastewater).

Stormwater Drainage

An existing storm drain serves the project site. The drain traverses through part of the southern portion of the site along Kellogg Drive and turns northwards through the site mid-way along Kellogg Drive (see Figure 8). Presently, the site is used for horse pasture, and there are no structures or paved areas within the site that could generate runoff flows. Excess runoff that may not percolate into the ground is conveyed into the existing storm drain serving the site.

Solid Waste

Currently, the project site generates very little solid waste as it is used for horse pasture. The existing student housing that will be replaced by the project currently generates approximately 212.9 tons of solid waste per year, as summarized in Table 12.

Table 12
Estimated Existing Student Housing Solid Waste Generation
(tons per year)

Facility	Generation Rate	Existing Student Housing	Existing Waste Generated
Student Housing	0.06 tons/student	1,411 students	84.70
Dining Commons	4.58 tons/1,000 sf	28,000 sf	128.20
<i>Subtotal</i>			212.90
Minimum 50% Solid Waste Diversion			-106.45
Total			106.45

Impact Criteria

Impact on public utility services will be significant if the project will exceed the utility's capacity to provide services and/or will require construction of new facilities or expansion of existing facilities, the construction of which would cause significant physical effects on the environment.

Environmental Impact

Water

Cal Poly Pomona purchases domestic water from the Three Valleys Municipal Water District (TVMWD) to supplement production from the campus-owned groundwater wells. The Student Housing Replacement site is located within Division 1 (South Pomona) service area of the TVMWD, administered by the Walnut Valley Water District.

During a normal (i.e. average) year, TVMWD's local sources: groundwater, surface water, and recycled water, have historically met about 49% of the entire water needs of its service area. The remaining balance of 51% is met by imported supplies from the Metropolitan Water District (MWD). Typically, the use of the imported water ranges from approximately 60,000 to 70,000 acre-feet per year. MWD draws water from both the State Water Project and Colorado River Aqueduct to serve TVMWD².

The Three Valleys Municipal Water District's 2010 Urban Water Management Plan, adopted in May 2011, provides future projections for its service area. Water conservation is a key component of TVMWD's long-term water supply and management strategy. The objectives include reductions in both indoor and outdoor use for all customer groups within its service area, to reduce demand for water. As part of MWD's projections, it is estimated that the total long-term savings from District-sponsored conservation measures within the TVMWD's service area would range from approximately 19,200 acre-feet in 2010 to 27,300 in 2035, reducing the overall demand for water. The forecasts for the average year, single dry year, and multiple dry years hydrologic conditions indicate that sufficient supply will be available to meet the overall demands within the TVMWD service area over the planning period of 2010 through 2035. This includes imported water supplies, which MWD notes in its 2010 Regional Urban Water Management Plan as being reliable through the same planning horizon³.

Tables 13 and 14 illustrate the projected water supplies and demand for an average year and multiple dry years.

² 2010 Urban Water Management Plan, Three Valleys Municipal Water District, May 2011.

³ 2010 Urban Water Management Plan, Three Valleys Municipal Water District, May 2011.

Table 13
Water Demand and Supply Projections – Average Year
(acre-feet)

	2010	2015	2020	2025	2030	2035
Conservation						
Conservation	19,199	20,381	20,908	23,165	25,306	27,326
Installed Active Device Through 2009	1,941	1,786	865	444	0	0
Code-Based and Price-Effect Savings	17,258	18,594	20,044	22,721	25,306	27,326
Total Demands After Conservation						
Total Demand	127,621	137,252	144,690	148,082	151,772	154,144
Retail Municipal and Industrial	122,367	131,999	138,437	141,829	145,519	147,891
Retail Agricultural	253	253	253	253	253	253
Groundwater Replenishment	5,000	5,000	6,000	6,000	6,000	6,000
Local Supplies						
Total Local Supplies	57,873	59,909	60,826	61,583	62,274	62,947
Groundwater Production	45,000	45,000	45,000	45,000	45,000	45,000
Surface Production	6,500	6,500	6,500	6,500	6,500	6,500
Groundwater Recovery	1,056	1,137	1,141	1,146	1,151	1,155
Recycling	5,317	7,272	8,185	8,937	9,623	10,292
M&I and Agricultural	5,317	7,272	8,185	8,937	9,623	10,292
Groundwater Replenishment	0	0	0	0	0	0
Other Non-Metropolitan Imports	0	0	0	0	0	0
Imported Water Demands						
Total Metropolitan Demands	69,748	77,343	83,864	86,499	89,498	91,197
Full Service (Tier I and Tier II)	64,748	72,343	77,864	80,499	83,498	85,197
Replenishment Water	5,000	5,000	6,000	6,000	6,000	6,000
Interim Agricultural Water Program	0	0	0	0	0	0

Table 14
Water Demand and Supply Projections – Multi-Dry Years
(acre-feet)

	2015	2020	2025	2030	2035
Conservation					
Conservation	20,381	20,908	23,165	25,306	27,326
Installed Active Device Through 2009	1,786	865	444	0	0
Code-Based and Price-Effect Savings	18,594	20,044	22,721	25,306	27,326
Total Demands After Conservation					
Total Demand	137,362	145,358	149,630	153,317	155,997
Retail Municipal and Industrial	132,098	139,294	143,366	147,053	149,733
Retail Agricultural	264	264	264	264	264
Groundwater Replenishment	5,000	5,800	6,000	6,000	6,000
Local Supplies					
Total Local Supplies	59,698	60,651	61,442	62,137	62,813
Groundwater Production	45,000	45,000	45,000	45,000	45,000
Surface Production	6,500	6,500	6,500	6,500	6,500
Groundwater Recovery	1,136	1,141	1,145	1,150	1,154
Recycling	7,062	8,010	8,797	9,487	10,159
M&I and Agricultural	7,062	8,010	8,797	9,487	10,159
Groundwater Replenishment	0	0	0	0	0
Other Non-Metropolitan Imports	0	0	0	0	0
Imported Water Demands					
Total Metropolitan Demands	77,664	84,707	88,187	91,179	93,184
Full Service (Tier I and Tier II)	72,664	78,907	82,187	85,179	87,184
Replenishment Water	5,000	5,800	6,000	6,000	6,000
Interim Agricultural Water Program	0	0	0	0	0

The project will provide replacement for existing student housing facilities that are currently using potable water, relocating this water use to the project site. The estimated potable water use associated with the provision of additional student beds and improvements to the dining facility within the replacement facilities is summarized in Table 15.

Table 15
Project Estimated Water Use
(gallons per day)

Facility	Water Use Rate	Net Increase In Size	Net Increase in Water Use (gdp)
Student Housing	8 gpd/student	245 students	1,960
Dining Commons	33 gpd/1,000 sf	7,000 sf	231
Total			2,191

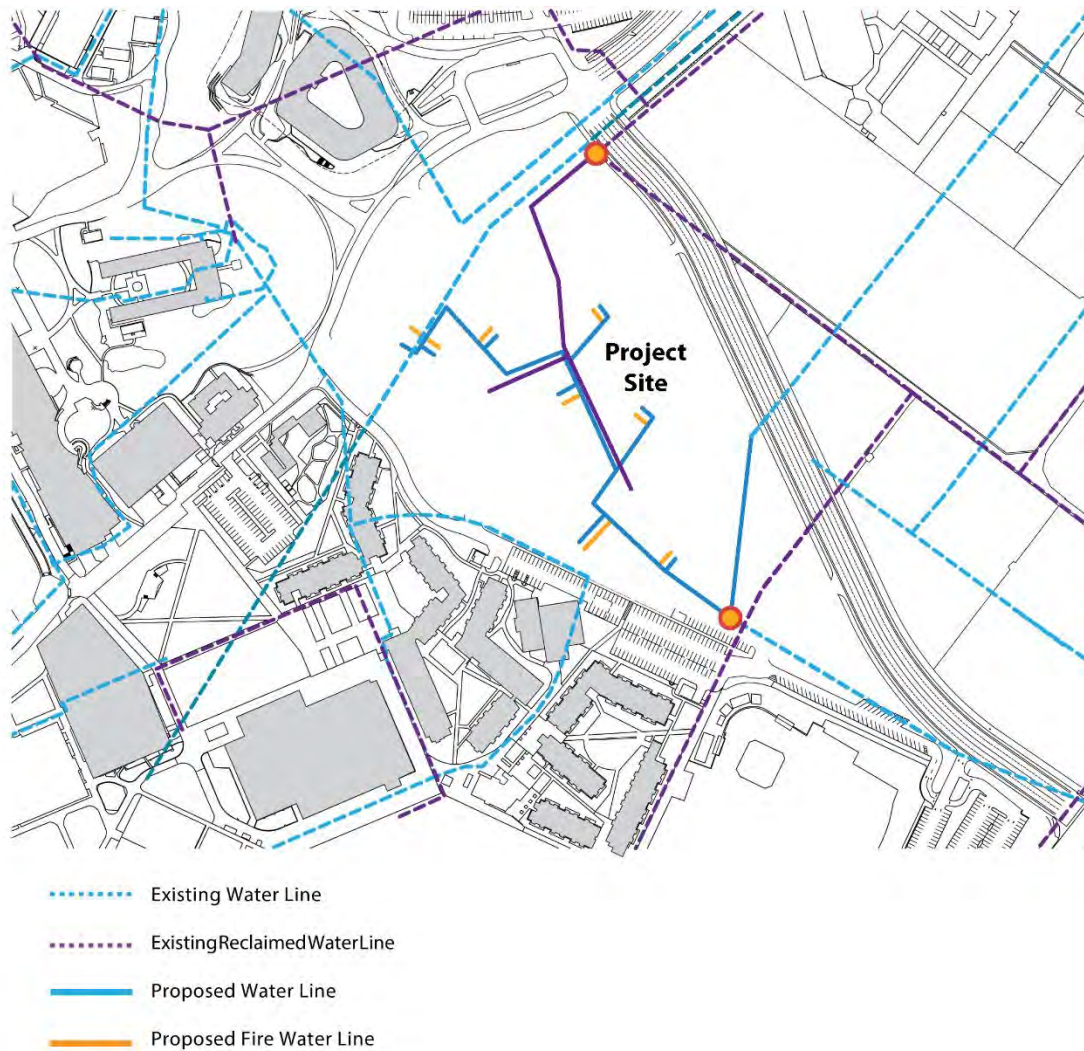
Note: sf = square foot; gdp = gallons per day

Water use rates for student housing based on water use data from Cal Poly Pomona University Village and Innovation Village, 2013-2015. Water use rates for dining commons based on water use data from Cal Poly Pomona Campus Replacement Housing and Dining Facility Project EIR, November 2013.

As shown, the project will result in use of additional 2,191 gallons of water per day, or less than 2.5 acre-feet of water per year, due to the provision of 245 additional beds and improved dining facility at the new Student Replacement Housing facilities. This water use represents approximately 0.0008% (eight ten-thousands of one percent) of the TVMWD projected increase in local water supply from year 2015 to 2035, and 0.00004% (four one hundred-thousands of one percent) of the projected 2035 total water supply during average and multiple dry years.

The project includes a provision of a new water line at the site to serve the Student Housing Replacement facilities, as illustrated in Figure 6. The new water line will connect to the campus' existing water utilities grid, which has the capacity to accommodate the project.

Water
Figure 6



Source: Cal Poly Pomona, 2016

All Student Housing Replacement project facilities will implement the mandated water conservation measures including ultra low-flow toilets, urinals, taps, water conservation plumbing, and other required conservation measures to reduce the amount of water used. All landscaping at the site will be with native or drought-resistant vegetation that will reduce the amount of water used for irrigating landscaped areas, and will use reclaimed water for irrigating the landscaping, further reducing the use of water at the site. Implementation of these water conservation measures and features in compliance with existing requirements and payment of all legally required capital facilities fees pursuant to and in compliance with the California Government Code Section 54999, will mitigate any

potential impact on the regional water system and infrastructure to a less than significant level.

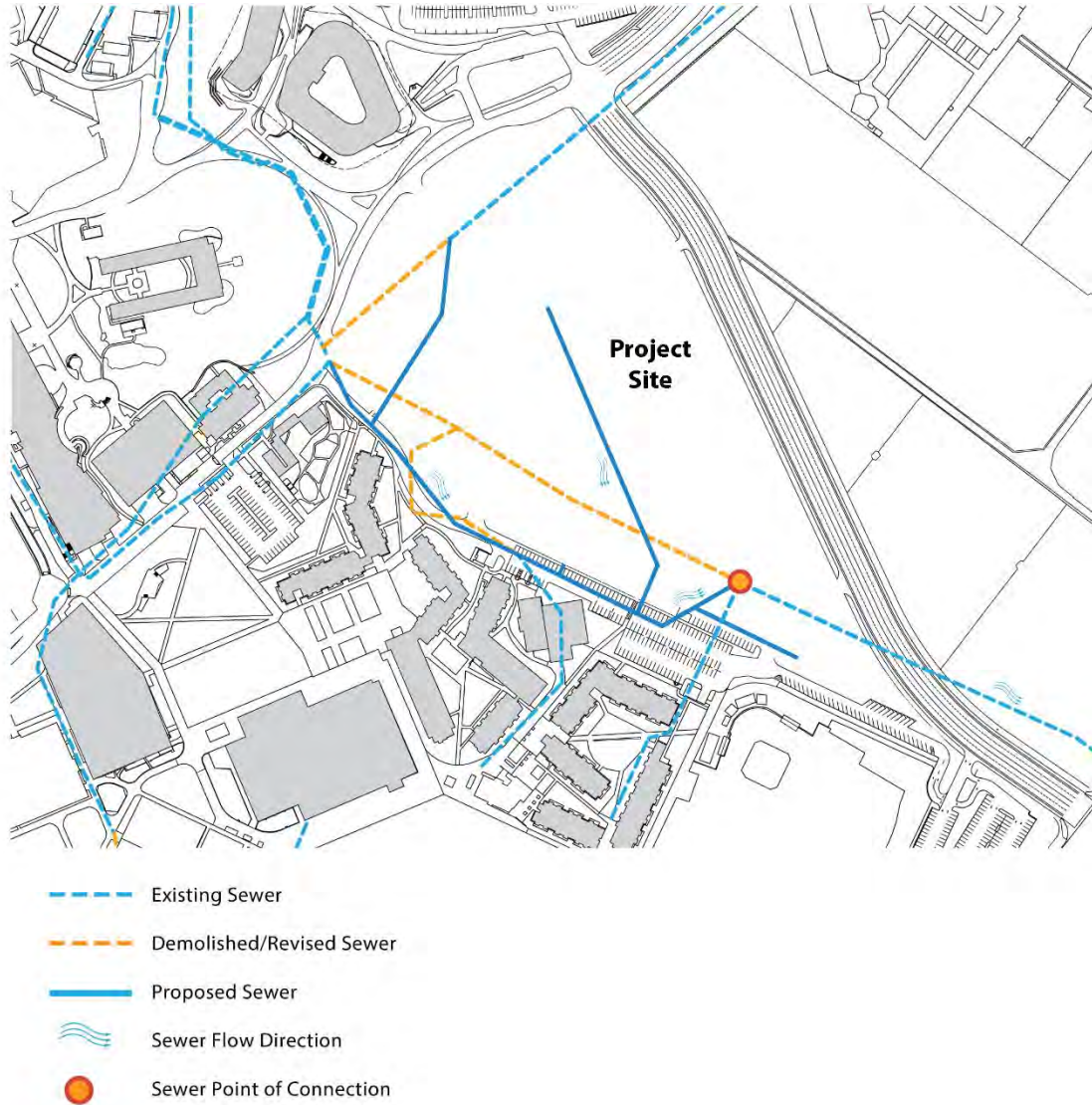
Sewer

Based on the projected water use, the project will generate approximately 2,081 gpd of wastewater (based on a factor of 95% of used water becoming wastewater). As illustrated in Figure 6, the project includes the provision of a new sewer line connected to the existing sewer grid of the campus that will serve the Student Housing Replacement facilities at the project site. The sewer grid of the campus will convey the project flows to the City of Pomona's new 24 to 27- inch sewer line. Both the campus' and the City's sewer lines have the capacity to accommodate project's flows.

Ultimately, the wastewater flows from these sewer lines will discharge for conveyance to the County Sanitation District No. 21 Outfall Trunk Sewer, located southwest of the intersection of Valley Boulevard and Pomona Boulevard. This 27-inch sewer has a design capacity of 19.4 million gallons per day (mgd). The wastewater will be treated at the San Jose Creek Water Reclamation Plant, which has a design capacity of 100 mgd. All sludge and any wastewater that exceeds the capacity of the San Jose Creek Water Reclamation Plant is diverted and treated at the Joint Water Pollution Control Plant in the City of Carson.

The mandated water conservation measures implemented in the new student replacement housing facilities, including ultra low-flow toilets, urinals, taps, water conservation plumbing, and other required conservation measures will reduce the amount of water used, and the resultant wastewater flows. Also, all legally required fees that may be applicable pursuant to the California Government Code Section 54999 will be paid to the appropriate sanitation agencies. The reduced wastewater discharges and payment fees as applicable will mitigate any potential impact on the regional sewer system to a less than significant level.

**Sewer
Figure 7**



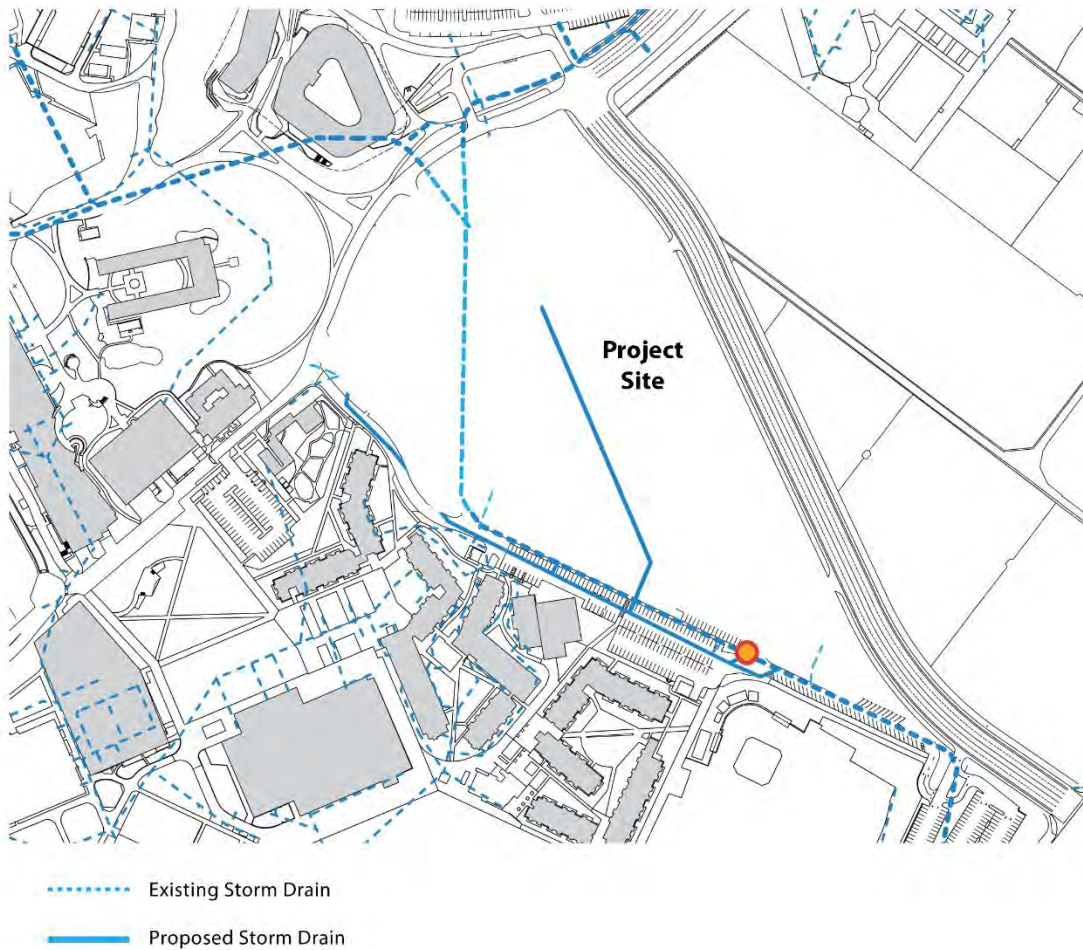
Source: Cal Poly Pomona, 2016

Stormwater Drainage

The development of the site with student housing will result in development of structures, surface parking, and other impervious surfaces that will generate stormwater runoff from the site, even though landscaping that will be provided within the site will maintain some of the it's pervious surfaces.

The development of the Student Housing Replacement includes a new storm drain infrastructure to accommodate runoff flows from the site, as illustrated in Figure 8. The new storm drain will connect to the existing campus' drainage utilities grid that eventually discharges into the San Jose Creek channel which serves as the primary drainage system of the entire Pomona Valley. The San Jose Creek channel is designed to accommodate a 100-year storm event at a minimum. The existing fully developed campus' drainage grid has adequate capacity to accommodate storm flows from the project site, and impact will be less than significant.

**Storm Drain
Figure 8**



Source: Cal Poly Pomona, 2016

Stormwater Quality

Stormwater runoff is regulated under the National Pollutant Discharge Elimination System (NPDES). The NPDES storm water permits provide a mechanism for monitoring the discharge of pollutants into stormwater runoff. Cal Poly Pomona is a co-permittee under the NPDES stormwater permit covering Los Angeles County for the municipal separate storm sewer systems (MS4) (Los Angeles County 2000). As co-permittee, the University ensures that all development within the campus boundaries abides by the NPDES requirements for construction and operations, as appropriate. Therefore, development of the Student Housing Replacement project site will implement the stormwater management control BMPs, including, but not limited to:

- Including pervious landscaped area(s) within the site.
- Landscaped area(s) will be designed as a bio-filtration swale that will provide water quality treatment by percolation into the ground.
- All landscaping will be with California native and/or drought-tolerant trees, and large shrubs (in place of grass turf), and will include gravel beds, so that the captured runoff will be filtered through both the gravel beds/soil and the plant materials.
- Parking areas will include rock islands to allow additional stormwater percolation into the soils.

Implementation of these BMPs in compliance with existing regulations will provide pervious surfaces and bio-filtration, and thus, in addition to retarding peak flows it will provide necessary functions to improve quality of stormwater runoff through bio-filtration. Compliance with these existing regulations will ensure that impact will be less than significant.

Solid Waste

Cal Poly Pomona implements comprehensive and successful solid waste reduction and diversion programs that have resulted in diverting over 50% of its solid waste through recycling, source-reduction, and other measures. This waste reduction and diversion is anticipated to continue to grow consistent with ultimate objective of the existing State laws (AB 75 and 341) of diverting at least 75% of the waste generated within the state by 2020. These waste diversion programs, including providing designed recycling facilities (e.g. recycling bins) and adequate storage area for collection and removal of recyclable materials at each facility, will be implemented at the Student Housing Replacement facilities.

The estimated project's solid waste generation is summarized in Table 16. As shown, the project will generate approximately 23 tons of additional solid waste per year that will require disposal.

Table 16
Estimated Project Solid Waste Generation
(tons per year)

Facility	Generation Rate	Net Increase In Size	Project Solid Waste Generated
Student Housing	0.06 tons/student	245 students	14.7
Dining Commons	4.58 tons/1,000 sf	7,000 sf	32.1
<i>Subtotal</i>			46.8
Minimum 50% Solid Waste Diversion			-23.4
Total			23.4

Source: CalRecycle 2010 and Cal Poly Pomona Campus Replacement Housing and Dining Facility Project EIR, November 2013.

Note: Calculations are rounded to the closes tenth.

With a continuing increase in recycling and waste reduction and the goal of 75% waste diversion, the amount of non-recyclable waste generated at the site is anticipated to be even smaller that indicated in Table 16. The waste from the site will be transferred to local recycling and processing facilities, including Mission Recycling and Burretec Waste Industries, and all non-recyclable solid waste generated at the site will be transported to the West Valley Materials Recovery Facility in Fontana. The West Valley Materials Recovery Facility maintains a permitted capacity of 8,280 tons per day and currently processes approximately 7,500 tons per day. These facilities can meet the demand of the diverted waste from the project. After processing and filtration at the West Valley Materials Recovery Facility, solid waste is diverted to a number of landfills within Los Angeles, San Bernardino, and Imperial counties.

As the Student Replacement Housing project will generate a small amount of solid waste and implement comprehensive waste reduction and diversion programs in compliance with existing laws and requirements that will divert 50% to 75% of waste from landfills, this impact is considered less than significant.

Mitigation Measures

With compliance with existing regulations and requirements, including design features required of the development of the project site with student housing replacement facilities, impact on public utilities and services and stormwater quality will be less than significant. No additional mitigation is required.

3.5 Aesthetics

Environmental Setting

The Student Housing Replacement facilities will be located on a 13-acre site in the southeastern area of the campus, which is currently used as a horse pasture. The project includes shifting a segment of Kellogg Drive to the east, placing it along the eastern boundary of the site and separating the site from the horse pasture to the east. The site is surrounded by the Cal Poly Pomona campus facilities, including a child care center, student residence suites, and a baseball field to the south; surface parking facilities to the west across Kellogg Drive; and the pasture of the Arabian horse center across the realigned Kellogg Drive to the east.

Impact Criteria

The impact is considered to be significant if the project will substantially degrade the existing visual character or quality of the project site or its surroundings.

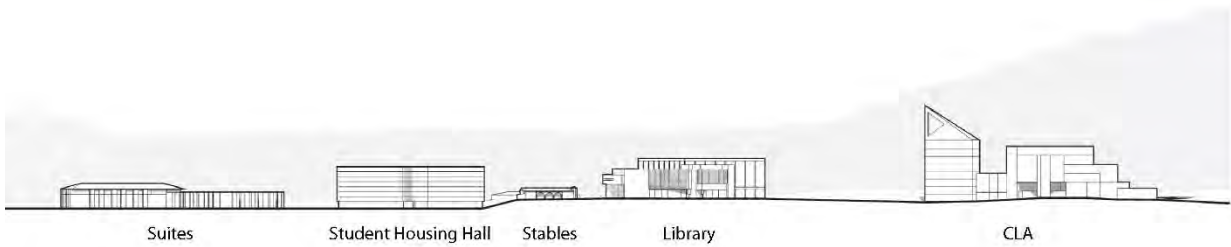
Environmental Impact

The project facilities will provide student housing with 1,645 beds, a dining facility, and associated surface parking (see Figure 2, Project Description). The residence halls are anticipated to be six to eight stories tall, and the dining commons will be a single-story facility. Figure 9 shows an illustrative concept of a student residence building.

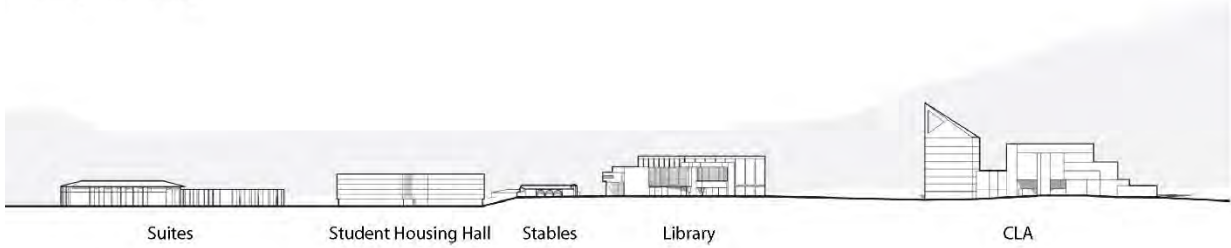
As illustrated in Figure 10, while the student replacement housing buildings will be relatively tall, the visual effect associated with the height of the buildings will be significantly moderated by a considerable grade differential between the site and the existing campus core. As shown, because the site is at a lower grade, the buildings are seen being of a lesser height relative to either the Library or the CLA - which are visually iconic and highly recognizable buildings on campus.



Illustrative Building Concept
Figure 9



8-story Building



6-story Building

Illustrative Height Comparison
Figure 10

The project's student residence halls will complement the existing Vista Bonita, Vista del Sol, Vista de las Estrellas, Vista de las Montañas, and Vista de la Luna residential suites facilities to the south of the project site. Merging with these Residential Suites will create a larger campus residential community that includes housing, dining, and recreation. It will also create a visual character and an overall image representing the student residential community. Variations in height between the four-story Residential Suites and six to eight-story project's residence halls, variations in architectural styles, and in landscaping will provide visual articulation and enrich the visual character and image of this greater student community.

The design of the student housing replacement facilities will include architectural details, varied structure rooflines, distinctive building facades, and varied landscaping to enhance visual character and quality. Lighting for the new facilities will represent a new source of light within the site, extending the lighted area within this portion of the campus. Therefore, all lighting will be focused into the site and away from surrounding area, and will be designed to minimize light overspill and glare while maintaining appropriate security and aesthetic character for the student housing residences.

However, even though the new facilities will include design feature that enhance their visual appearance and landscaping on the site will provide further visual articulation, the project will result in a significant change in the visual character of the site. The change from the existing horse pasture to an urban landscape with a cluster of relatively tall buildings will introduce urban visual character onto the site and expand urban visual character within the campus. Therefore, while the implementation of design features into the new facilities and site design is anticipated to result in the development of the site that, on its own, is visually high quality and attractive in a long-term, the change itself to an urban landscape may be considered by some to be a significant impact in the visual character of the site and the surrounding area.

Mitigation Measures

The project design will incorporate architectural details, varied structure rooflines, distinctive building facades, shielded lighting that is focused away from the surrounding area, landscaping, and other features to enhance visual character and quality of the student replacement facilities. These measures will enhance the visual character of the student housing replacement facilities; however there are no additional feasible mitigation measures to reduce the visual effect of the change itself from a horse pasture to urban landscape.

Level of Impact After Mitigation

Even with incorporation of the project design features, the change itself in the visual character of the site may be considered by some to be a significant impact that cannot be mitigated.

3.6 Historic and Cultural Resources

Environmental Setting

Historic Resources: The proposed replacement of student housing involves removal of the existing student housing buildings that are being replaced due to their location in the seismic fault zone. Those existing buildings include Cedritos, Palmitas, Encinitas, Alamitos, Aliso, and Montecito residence halls, and the Los Olivos dining commons. The Encinitas, Montecito, Alamitos, and Aliso residence halls were built between 1958 and 1960, and the Cedritos and Palmitas halls were built in 1968. None of these facilities is either designated or listed as a historic resource on either county, state, or national registers of historic places.

Cultural Resources: A cultural resources records search was conducted for the entire campus and the area within a 0.25-mile radius of the campus boundary⁴, to identify any recorded archeological resources. Based on the records search and a review of existing cultural resources reports pertaining to the campus area, no cultural resources have been identified within the campus, including the project site.

Impact Criteria

The impact is considered to be significant if the project will cause a substantial adverse change in the significance of a historic or archaeological resource or destroy a unique paleontological resource.

Environmental Impact

Historic Resources: The student replacement housing will be developed in two phases, and once each phase is completed, the existing student housing facilities that are being replaced will then be removed. None of these existing facilities is either designated or listed as a historic resource on either county, state, or national registers of historic places. However, since many of these existing student residences are over 50 years old, a historic resources evaluation report was prepared by Architectural Resources Group Inc. (ARG)⁵ to address a potential impact of their removal (see Appendix C).

⁴ Historic Resources Evaluation Report. ARG, June 10, 2013.

⁵ *Ibid.*

The evaluation report concluded that the Encinitas, Montecito, Alamitos, and Aliso residence halls, the Los Olivos dining commons, and the associated landscape features do not meet the criteria for listing in the National Register of Historic Places, or the California Register of Historical Resources. Therefore, these facilities are not considered to be a historic resource, and their removal will not result in an impact to historic resources.

However, the Palmitas and Cedritos residence halls, constructed in 1968, appear to be eligible for the California Register as part of a historic district because it is a significant example of the work of the highly noted Southern California architectural firm, Smith & Williams. Their work is well-documented and recognized as helping to define the architectural character of the period and thus regarded as the “work of a master”. As such, the Palmitas and Cedritos residence halls and their landscape features are considered historic resources, and therefore, their removal will result in a significant impact.

Cultural Resources: Based on the cultural resources records search and a review of existing cultural resources reports pertaining to the campus area, no cultural resources have been identified within the entire campus, including the project site and the site of the existing buildings that will be replaced by the project. While the potential for uncovering such significant resources is considered remote, in an unlikely event that such resources are discovered during project construction, compliance with existing laws and regulations will ensure no significant impact. These laws and regulations include: (1) stopping work in the event that a paleontological resource is discovered until a qualified paleontologist can visit the site and assess the significance of the potential paleontological resource.; (2) the paleontologist will then conduct on-site paleontological monitoring, including inspection of exposed surfaces to determine if fossils are present, and (3) if fossils are present, the monitor will have the authority to divert grading away from exposed fossils temporarily in order to recover the fossil specimens.

In addition, in an unlikely event that containing human remains are inadvertently discovered during construction, compliance with existing laws and regulations will ensure no significant impact. These laws and regulations include: (1) ceasing construction in the vicinity of the discovery or any nearby area, and (2) immediately notifying the Los Angeles County Coroner’s Office. Furthermore, if the county coroner determines that the remains are Native American, then (1) contacting the Native American Heritage Commission within 24 hours, (2) the Native American Heritage Commission will then designate a most likely descendent who may make recommendations concerning the disposition of the remains and associated grave goods in consultation, and (3) if the Native American Heritage Commission is unable to identify a most likely descendant or if the most likely descendent failed to make a recommendation within 24 hours, reburying the remains and associated grave goods on the property in a location that will not be disturbed.

Mitigation Measures

Cultural Resources: In an unlikely event that previously unknown cultural resources are discovered during the removal of the existing student housing or construction of the replacement housing, compliance with the existing laws and requirements will reduce that impact to a less than significant level.

Historic Resources: The following mitigation measures will be implemented prior to removal of the Palmitas and Cedritos residence halls:

1. Commission professional HABS⁶-style photographic documentation of the entire potential historic district with color 35-millimeter photographs, accompanied by HABS outline documentation. Building documentation should concentrate on the Palmitas and Cedritos residence halls buildings and their settings, but should also cover the La Cienega Center – which is a contributor to the district. File the documentation with the Cal Poly Pomona Library Department of Special Collections and Archives as well as with the Smith & Williams records, Architecture and Design Collection of the Art, Design & Architecture Museum at the University of California, Santa Barbara.
2. Commission professional, brief video documentation with informal narration of the entire district to note the landscape, indoor and outdoor spaces, qualities and materials of the buildings, and the interconnections among the buildings in the grouping. File the video documentation with the Cal Poly Pomona Library Department of Special Collections and Archives.

Level of Impact After Mitigation

While the potential for uncovering previously unknown significant archaeological or paleontological resources on the project site, or on the site of buildings that will be removed, is considered remote, in an unlikely event that such resources are discovered during construction, compliance with existing laws and regulations will ensure no significant impact.

However, even with the incorporation of the identified mitigation measures impact to historic resources resulting from removal of the Palmitas and Cedritos residence halls will remain significant.

⁶ The Historic American Buildings Survey (HABS) is the oldest federal preservation program documenting America's architectural heritage. HABS establishes the standards for the production of drawings, histories, and photography, as well as the criteria for preparing documentation, currently recognized as the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation.

3.7 Construction Effects

This section examines short-term effects associated with the construction of the proposed Student Housing Replacement project.

Environmental Setting

Generally, construction activities result in short-term noise, dust, air, and water pollution impacts, as well as increased truck and construction worker trips and localized traffic congestion. In most cases, general disturbance and annoyance associated with construction affects uses in close proximity to the construction site. However, other construction impacts, such as those on air and water quality, can affect areas at great distances from a specific construction site.

The 13-acre project site is located in the southeastern area of the campus, which is currently used as a horse pasture. The project includes shifting a segment of Kellogg Drive, placing it along the eastern boundary of the site, and separating the site from the horse pasture to the east. The site is surrounded by the Cal Poly Pomona campus facilities, including a child care center; student residence suites, and a baseball field to the south; surface parking facilities to the west across Kellogg Drive, and pasture of the Arabian Horse Center to the east.

Impact Criteria

Construction activities are considered to have a significant impact if they substantially disrupt or interfere with day-to-day operations of surrounding land uses, substantially affect sensitive uses, or create public health and/or safety hazards.

Environmental Impact

Air Quality and Greenhouse Gas

Construction emissions associated with the Student Housing Replacement project were calculated using the current version of the California Emission Estimator Model (CalEEMod), version 2013.2.2. The model uses current CARB emission factors for automobile and truck emissions and EPA emission factors for equipment and fugitive dust. CalEEMod estimates worker trips and truck trips based on average construction requirements. To account for a “worst-case” peak day construction emissions, the highest number of equipment pieces on any given day is used and all equipment pieces are assumed

to operate full 8 hours a day, even though in practice, not all this equipment will be in use simultaneously for 8 hours during any single construction day. While the short-term construction emissions of the criteria pollutants also generate greenhouse gas emissions, there is no established peak day threshold for those emissions.

The Student Housing Replacement project will be constructed in two phases. During the first phase, buildings accommodating approximately 980 beds will be constructed and completed by 2019. The remaining facilities housing 665 beds will be constructed in phase two and will be completed by 2022. In addition, as each phase of the student housing facilities is completed, the corresponding portion of the existing student housing facilities that are being replaced will be demolished. The overlap of the phase one construction and existing facilities demolition is assumed to be the peak construction period for the project.

In addition, the Administration Replacement project, located northwest of Kellogg Drive and Red Gum Lane, is planned to be completed in 2018. Considering the possibility of construction overlap between the Administration Replacement project and the first phase of the Student Housing Replace project (construction and demolition), the estimated peak day emissions from both projects were added and analyzed as the “worse-case” peak day construction emissions. The estimated peak day criteria pollutant emissions are summarized in Table 17.

Table 17
Estimated Peak Day Criteria Air Pollutant Emissions from Construction
(pounds per day)

	Reactive Organic Gases (ROG)	Oxides of Nitrogen (NO_x)	Carbon Monoxide (CO)	Fine Particulate Matter (PM₁₀)	Fine Particulate Matter (PM_{2.5})	GHG (CO₂e)
Administration Replacement project *	26	17	25	3	2	4,211
Student Housing Replacement project	71	97	82	27	15	14,076
Total	97	114	107	30	17	18,287
SCAQMD Threshold	75	100	550	150	55	-
Exceed Threshold?	Yes	Yes	No	No	No	-

Note: The higher of winter or summer emissions are shown.

Based on daily maximum construction emissions during construction years.

* Emissions for the criteria air pollutants are based on the final year of construction for the Administration Replacement project as reported in the “*Administration Replacement Project EIR, October 2013*”

Source: CalEEMod 2013, Version 2013.2.2.

As shown, short-term peak day construction emissions will be below the SCAQMD threshold amounts for criteria pollutants, except for ROG and NO_x emissions. Since the peak construction day emissions of ROG and NO_x could be above the threshold amount, this potential impact is considered significant.

Toxic Air Pollutants

The California Air Resources Board has identified diesel particulate emissions as carcinogenic air toxics. No safe threshold for the emissions has been established. However, the amount of diesel emissions associated with a modest amount of construction associated with the Student Housing Project will be relatively small and will not involve massive or prolonged operations of diesel trucks or equipment. While diesel exposure from construction is not expected to be a significant impact, because there are existing campus facilities in the vicinity of the site mitigation measures have been identified to reduce diesel particulate emissions from construction equipment.

Water Quality

Construction activities can impact water quality in several ways. First, to comply with SCAQMD guidelines, most construction sites are required to be watered to reduce emissions of PM₁₀. This can result in runoff from the site laden with construction debris (including trash, cleaning solvents, cement wash, asphalt and car fluids like motor oil, grease, and fuel) and sediment, potentially affecting local waterways. Second, during rain storms, stormwater runoff from construction sites can carry construction debris and sediment into local waterways.

For construction in areas of 1 acre or more in size, current regulations require design and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which focuses on the implementation of Best Management Practices (BMPs). SWPPPs may include the following BMPs to reduce impacts on water quality:

- Schedule excavation and grading work for dry weather
- Use as little water as possible for dust control
- Never hose down dirty pavement of impermeable surfaces where fluids have spilled
- Utilize re-vegetation, if feasible, for erosion control after clearing, grading, or excavating
- Avoid excavation and grading activities during wet weather
- Construct diversion dikes to channel runoff around the site, and line channels with grass or roughened pavement to reduce runoff velocity
- Cover stockpiles and excavated soil with wraps or plastic sheeting
- Remove existing vegetation only when absolutely necessary
- Consider planting temporary vegetation for erosion control on slopes where construction is not immediately planned

With implementation of these BMPs impact will be less than significant, and no additional mitigation measures beyond compliance with existing regulations are required.

Noise

Construction activities will result in a temporary increase in ambient noise levels in the vicinity of the site. During construction, noise from heavy equipment, power and air tools, compressors, trucks, and from loading and unloading will occur with varying frequency and intensity. At a distance of 50 feet from the noise source, construction equipment noise levels (principally from engine exhaust and engine noise) range from 75 to 95 dB(A) for tractors, up to 95 dB(A) for construction trucks, up to 88 dB(A) for concrete mixers, and up to 87 dB(A) for compressors. These temporary noise levels will not be continuous but will vary as equipment is used for varying lengths of time throughout the construction period. During grading and other construction, peak noise levels at 50 feet would range from 75 to 90 dB(A), with occasional higher peaks.

Noise levels fall substantially with increasing distance from the noise source, both as a result of spherical spreading of sound energy and absorption of sound energy by the air. Spherical spreading of sound waves reduces the noise of a point source by six decibels for each doubling of distance from the noise source. Absorption by the atmosphere typically accounts for a loss of one decibel for every 1,000 feet. Thus, high levels of construction noise usually are limited to the immediate vicinity of construction activities.

Nonetheless, short-term and intermittent noise from construction will be audible within the adjacent area. As the pasture of the Arabian Horse Center - which is a noise sensitive use, is immediately adjacent to the site, the University will work with the Center throughout the construction of the student housing replacement facilities to provide advanced information about construction activities that are scheduled to take place and their duration, with a focus on minimizing noise effects to the extent feasible. In addition, since other noise sensitive uses, including the child care center and residential suites are located nearby the site to the south, mitigation measures have been identified to reduce noise impact.

Traffic/Circulation

Construction activity will add trucks and construction equipment to streets in the area. Haul trucks and heavy equipment usually travel more slowly than other traffic on the street network and require more time to enter and exit traffic flows. When heavy equipment enters or exits a construction site, it may interrupt vehicular or pedestrian traffic. Construction activities associated with the Student Housing Replacement project will involve the use of trucks, usually for short periods of time, to deliver construction materials and haul away construction debris. These trucks and equipment may cause localized congestion at some locations in the surrounding area, which is a potentially significant impact if not properly mitigated. Therefore, mitigation measures have been identified to reduce these potential impacts.

Solid Waste

Construction of the Student Housing Replacement project will generate construction materials waste. Even though the overall construction activities associated with the Project will not involve massive construction that could generate significant amounts of solid waste, mitigation has been identified to reduce this impact.

Mitigation Measures

The University will implement the following mitigation measures to reduce identified impacts by imposing conditions on the construction contractor.

Air Quality and Greenhouse Gas

1. During high wind episodes (wind speeds exceeding a sustained rate of 25 miles per hour); grading or other high-dust generating activities will be suspended.
2. During smog alerts, all construction activities will be suspended.
3. All construction equipment will be properly tuned.
4. Diesel particulate filters are installed on diesel equipment and trucks and low sulfur diesel will be used for construction equipment.
5. Gasoline, butane, or electric power construction equipment will be used if feasible.
6. To reduce emissions from idling, the contractor shall ensure that all equipment and vehicles not in use for more than 5 minutes are turned off, whenever feasible.
7. Low VOC-content asphalt and concrete will be utilized to the extent possible.
8. All stockpiles will be covered with tarps or plastic sheeting.
9. Speeds on unpaved roads will be reduced below 15 miles per hour.
10. All haul trucks that carry contents subject to airborne dispersal will be covered.
11. All access points to the site used by haul trucks will be kept clean during site earthwork.
12. Exposed surfaces will be watered as needed.
13. All access points used by haul trucks will be kept clean during earthwork.
14. Electricity from power poles rather than temporary diesel or gasoline generators will be used to the extent available.
15. As needed, outdoor activities in the site vicinity will be limited during high-dust and other heavy construction activities.
16. Throughout the construction period, the filters in the ventilation systems in the child care center building and residential suites to the south of the of the project site will be inspected on a monthly basis and replaced as needed to ensure that the systems are providing proper ventilation.

Noise

1. Construction hours will be restricted per City of Pomona regulations, which limit the hours of construction activity between 7:00 am and 6:00 pm Monday through

Friday, and from 8:00 am and 6:00 pm on Saturdays. No construction activity will take place on Sunday or federal holidays.

2. Muffled construction equipment will be used whenever possible.
3. Construction staging areas will be located as far as possible from nearby uses.
4. As needed, a temporary barrier of no less than 8 feet in height made of solid wood or other similar material will be provided along the site's northern boundary adjacent to the horse pasture of the Arabian horse center, and along the site's southern boundary to protect the nearby child care center and residential suites from construction noise.

Traffic and Circulation

1. A flag person will be employed as needed at various intersections to direct traffic when heavy construction vehicles enter the campus.
2. Construction and haul trucks will use the City of Pomona designated truck routes to travel to and from the site.
3. Construction-related truck traffic will be scheduled to avoid peak travel time on the I-10 freeway and State Route 57, as feasible.
4. Hauling of equipment and materials and other truck trips during construction will be scheduled during non-peak hours, to the extent feasible.

Solid Waste

1. Construction inert materials, including vegetative matter, asphalt, concrete, and other recyclable materials will be recycled to the extent feasible.

Level of Impact After Mitigation

With implementation of the identified mitigation measures most of the short-term construction impacts will be reduced to a less than significant level. However, since the peak construction day ROG and NO_x emissions may exceed the SCAQMD's threshold, this impact is considered significant.

4.0 Alternatives to the Project

The following discussion considers alternative scenarios to the Student Housing Replacement project. Through comparison of these alternatives, the relative advantages of each can be weighed and analyzed.

The CEQA Guidelines state that an EIR need not consider every conceivable alternative to the project [Section 15126.6(a)], or an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative [Section 15126.6(f)(3)]. The Guidelines require that a range of alternatives be addressed “governed by ‘a rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” The discussion of alternatives must focus on alternatives that are potentially feasible and capable of achieving major project objectives while avoiding or substantially lessening any significant environmental effects of the project [CEQA Guidelines, Section 15126.6(f)].

The primary objectives of the Student Housing Replacement project are:

- Provide the student housing replacement facilities necessary to replace the existing aging student housing facilities which are located in a seismic fault zone
- Enhance the provision of student housing on campus to help accommodate the strong student demand for on-campus housing
- Enhance the provision of student housing on campus since living on campus increases students’ academic success and improves graduation rates

The project impacts analyzed in this EIR were found to be mostly either less than significant or can be mitigated to less than significant levels with mitigation measures identified in the EIR. The significant impacts associated with the project are the visual impact associated with providing student housing replacement facilities on the site, impact on potential historic resources associated with the removal of the existing student housing being replaced by the project, and potential short-term and intermittent air quality effects of construction. Thus, the following analysis focuses on alternatives that can reduce some of the identified significant impacts. Environmental effects after full implementation of mitigation measures are used as a basis for comparison.

Alternative 1: No Project Alternative

The No Project alternative, required to be evaluated in the EIR, considers “existing conditions...as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” [CEQA Guidelines Section 15126.6(e)(2)].

Pursuant to this alternative the project site would remain in its current condition and would continue its current use as a horse pasture. This alternative would not achieve any of the project's primary objectives.

Alternative 2: Smaller Project

The project facilities will provide student housing with 1,645 beds. The new student residence facilities will replace 1,400 beds in existing student residence halls, as well as provide 245 additional beds on campus. Pursuant to this alternative, the project would only replace student beds in the existing facilities as those facilities need to be removed due to their location in a seismic fault zone.

Pursuant to this alternative, new student residence halls would be constructed on the site. As with the project, the buildings would be six to eight story since providing 245 fewer student beds would require similar size facilities to accommodate 1,400 replacement beds. As with the project, the change from the existing horse pasture to an urban landscape with a cluster of relatively tall buildings would introduce urban visual character onto the site and expand urban visual character within the campus. As with the project, the implementation of design features into the new facilities and site design would be anticipated to result in the development of the site that, on its own, would be visually high quality and attractive in a long-term. However, the change itself to an urban landscape could be considered by some to be a significant impact in the visual character of the site and the surrounding area that cannot be mitigated.

As with the project, this alternative would involve removal of the existing student facilities, including the Palmitas and Cedritos residence halls and their landscape features which are considered potentially eligible for listing on the California Register of Historical Resources. As with the project, removal of these facilities would result in a significant impact on historic resources that cannot be fully mitigated.

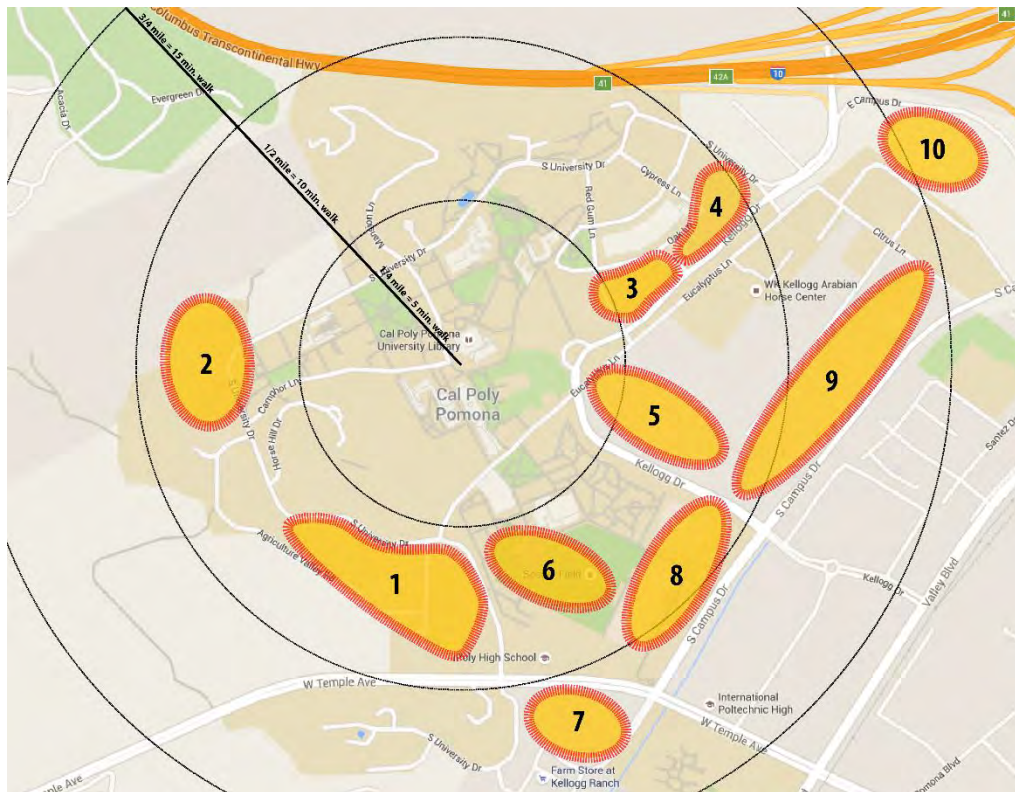
The construction of new facilities under this alternative would generate short-term and intermittent air pollutant emissions. As with project, the peak construction day emissions of ROG and NO_x under this alternative may exceed the SCAQMD threshold, resulting in significant project and cumulative impact.

Therefore, providing only the necessary replacement student beds would neither avoid nor substantially reduce any significant project impacts, and would eliminate the project's beneficial long term impact on air quality from reducing vehicular emissions associated with student commute trips. Furthermore, this alternative would not achieve primary project objectives of enhancing the provision of student housing on campus to help accommodate the strong student demand for on-campus housing, and enhancing the provision of student housing since living on campus increases students' academic success and improves graduation rates. Therefore, this alternative is considered environmentally inferior to the project.

Alternative 3: Alternate Location

The University conducted a year-long evaluation process for the Student Replacement project. The evaluation process started with examination of the entire area of the main campus and immediately south of West Temple Avenue. In the first step of the process, the area was evaluated based on checking for basic constraints of: a location in a seismic zone, built area, major roadways, legacy or committed land that cannot be used for student housing, and extreme slopes. Areas that were subject to these constraints were then removed from further consideration. The next step of the process involved identifying criteria for student housing in terms of location, community connections, and infrastructure. The location criteria included proximity to academic facilities; proximity to recreation; proximity to student services; proximity to existing student housing; proximity to potential central dining, and proximity to open space. Community connections criteria included a strong freshman community and a sense of inclusion with campus community. The infrastructure criteria included safety and security, adequate site size, utility and central plant needs, as well as pedestrian and bicycle accessibility. Based on those criteria, the potential 10 locations (illustrated in Figure 11) were identified and surveyed.

Potential Locations Studied
Figure 11



Source: Cal Poly Pomona, 2015

In the next step, those locations were ranked and four most highly ranked locations were identified. The four locations included site 1, site 3, the project site (site 5), and site 6. Then, those locations were further evaluated, including identifying challenges associated with each site. Site 1 located in the southwestern corner of the campus is close to the existing high school and relatively distant and isolated from other student housing and the center of the campus; it has poor pedestrian and bicycle accessibility, and would require a satellite dining service and a dedicated central plant due to its relatively remote location. Site 3 linear configuration provides limited options for open space and creating a sense of community; it is close to the parking structure 1 which creates a barrier behind the site and divides the site with its major entrance; and would require replacing surface parking that is currently provided on this site. Site 6 could require replacing the soccer stadium, track or baseball field, which have been recently upgraded.

Providing student housing on those sites would result in a range of environmental effects including the need to construct a new central plant, the need to replace existing facilities, site configuration that would require very dense clustering of buildings, and poor pedestrian and bicycle accessibility. Providing student replacement housing at any of those sites would result in the same unavoidable environmental impacts as those of project, including changing visual character of the site, removing existing student housing facilities that have potential historic value, and generating air pollutant emissions during construction. Thus, none of those alternative sites would eliminate or substantially reduce these impacts, and some of those sites would result in additional or greater impacts.

The project location was selected because it offered the most advantages for future student residents. Since student housing at the site will also merge with the Residential Suites student housing, it will create a larger campus residential community that includes housing, dining, and recreation. The project site is close to the center of campus, allowing students to get to the BRIC, the Bronco Student Center, and the University Library within minutes. The site is also adjacent to the pastures of the W.K. Kellogg Arabian Horse Center and is close to the athletics fields. In addition, by shifting Kellogg Drive eastward to integrate the new freshmen housing with the rest of the university campus, vehicle traffic will be directed away from the core of campus enhancing pedestrian and bicycle accessibility and safety.

Alternative 4: Additional Student Housing

This alternative considers providing additional student housing at the project site to accommodate 2,500 students, including 1,400 students relocated from the existing residence halls that will be removed. With a waiting list of about 1,500 for on campus housing for freshmen students, the need for additional student housing on campus has become acute.

Pursuant to this alternative, and as with the project, the new facilities would be six to eight story tall. As with the project, the change from the existing horse pasture to an urban landscape with relatively tall buildings would introduce urban visual character onto the site

and expand urban visual character within the campus. With more facilities at the site, a larger campus student residential community that includes housing, dining, and recreation, would be created. It would also create a more defined visual character and a stronger overall image representing the student residential community merging with the existing Residential Suites to the south of the site. As with the project, the implementation of design features into the new facilities and site design would be anticipated to result in the development of the site that on its own, would be visually high quality and attractive in a long-term. However, same as with the project, the change itself to an urban landscape could be considered by some to be a significant impact in the visual character of the site and the surrounding area that cannot be mitigated

As with the project, this alternative would involve removal of the existing student facilities, including the Palmitas and Cedritos residence halls and their landscape features which are considered potentially eligible for listing on the California Register of Historical Resources. As with the project, removal of these facilities would result in a significant impact on historic resources that cannot be fully mitigated.

The construction of new facilities under this alternative would proceed over time in phases and each phase would generate short-term and intermittent air pollutant emissions from construction activities. As with project, the peak construction day emissions of ROG and NO_x under this alternative may exceed the SCAQMD threshold, resulting in a significant impact.

Provision of more on-campus student housing under this alternative would further reduce commute trips to campus and vehicle miles traveled (VMTs). Under this alternative, the VMTs would be reduced by 22,042 miles in comparison with the project's VMT reduction of 3,970 miles per day from student commuting trips. With a greater reduction in VMTs, the magnitude of the beneficial impact of reducing vehicular emissions of air pollutants and GHG within the South Coast Air Basin would be significantly increased, as summarized in Table 18.

With more students living on campus instead of commuting would also eliminate additional peak hour travel on the street and roadway network serving the campus.

As with the project, the additional housing facilities on the site would be connected to the campus' utility grid that has the capacity to serve additional facilities. The fire and police protection services for the project site would also serve the additional student housing within the site.

Table 18
Additional Student Housing Alternative Operational Emissions

	Reactive Organic Gases (ROG) pounds/day	Oxides of Nitrogen (NO_x) pounds/day	Carbon Monoxide (CO) pounds/day	Fine Particulate Matter (PM₁₀) pounds/day	Ultrafine Particulate Matter (PM_{2.5}) pounds/day	GHG (CO₂e) metric tons/year
Existing Student Housing						
Area Sources	13	neg.	40	neg.	neg.	-
Energy	neg.	3	2	neg.	neg.	-
Vehicular Emissions	4	9	38	8	2	-
<i>Subtotal</i>	17	12	80	8	2	3,800
Additional Student Housing Alternative						
Area Sources	22	neg.	72	neg.	neg.	-
Energy	neg.	4	3	neg.	neg.	-
Vehicular Emissions	4	9	40	8	2	-
<i>Subtotal</i>	27	14	115	9	2	4,656
VMT Reduction *	-50	-34	-456	-neg.	-neg.	-2,187
<i>Subtotal</i>	-23	-20	-341	9	2	2,469
Additional Student Housing Alternative Total Net Emissions						
Project Emissions minus Existing Student Housing Emissions	-40	-32	-421	1	0	-1,331
SCAQMD Threshold	55	55	550	150	55	-
Exceeds Threshold?	No	No	No	No	No	-

* Vehicular emissions reduction is calculated by applying EPA Emission Factors (per mile) for each pollutant and for GHG to VMT reductions resulting from the provision of student housing at the site.

+ Calculation based on EPA Emission Factors (per mile) for VOC.

Therefore, providing additional student housing would not increase the project's significant impacts or result in new significant impacts. However, providing additional on campus student housing would substantially increase the beneficial impacts of reducing student commute trips and the associated air pollutant and GHG emissions. Furthermore, this alternative would achieve to a much greater extent the primary project objectives of enhancing the provision of student housing on campus to help accommodate the strong student demand for on-campus housing, and enhancing the provision of student housing on campus since living on campus increases students' academic success and improves graduation rates.

Environmentally Superior Alternative

Among the alternatives considered, the Additional Student Housing Alternative could be considered environmentally superior to the project because while it would result in the same impacts as those associated with the Student Housing Replacement project, it would significantly increase the beneficial air quality and GHG effects as well as achieve project objectives to a much greater extent. However, since funding for additional student housing is not in place, this alternative may not be fiscally viable at this time.

5.0 Cumulative and Long-Term Effects

Cumulative Effects

The CEQA Guidelines (Section 15355) define a cumulative impact as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” The Guidelines [Section 15130(a)(1)] further state that “an EIR should not discuss impacts which do not result in part from the project.”

Section 15130(a) of the CEQA Guidelines provides that “[A]n EIR shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable...” Cumulatively considerable, as defined in Section 15065(a)(3), “means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”

There are three related projects within the proximity of the student housing replacement project. They include the Parking Structure 2, which replaces surface parking lots K1 and K2 (600 parking spaces) with a new 1,800-space facility; two relatively small research/office buildings (123,000 and 100,000 square feet) at the Cal Poly Pomona Innovation Village; and the Administration Building Replacement project which provides replacement for the existing CLA building and other functions. All these projects are anticipated to be completed before the Student Housing Replacement project, with the parking structure and small research/office projects completed by 2016, and the administration replacement building by 2018.

Traffic and Circulation

The traffic analysis in this EIR (see Section 3.1) addresses both project-specific and cumulative traffic and circulation impacts that account for background traffic associated with long-term regional growth and addition of traffic generated by related projects.

Based on the traffic analysis, the project and cumulative traffic impact will be less than significant. As discussed in Section 3.1, the Student Housing Replacement project will result in a beneficial impact of reducing vehicle miles travelled (VMTs) by providing additional student beds within the replacement facilities on campus.

Air Quality and GHG

As discussed in this EIR (Section 3.2, Air Quality and Greenhouse Gas (GHG)), the Student Housing Replacement project will result in a beneficial impact of reducing air pollutant and GHG emissions in comparison with the emissions that the existing student housing facilities - which are being replaced by the project, are currently generating. By providing 245 additional student beds on campus, the project will have a beneficial impact of reducing student vehicular commute trips and the associated air pollutant emissions. This may contribute to a cumulatively beneficial effect when considered in connection with other projects and programs promoting locating residences in close proximity to employment and education centers and promoting the use of alternative modes of transportation. No adverse cumulative effect will result.

Historic Resources

As discussed in this EIR (Section 3.6, Cultural Resources), the Student Housing Replacement project will result in a significant impact on historic resources because two of the existing facilities that are being replaced appear to be eligible for listing on the California Register as part of a historic district. The potential historic value associated with these buildings is due to the buildings' potential of providing a significant example of the work of the highly noted Southern California architectural firm, Smith & Williams. The related projects do not involve or affect any historic buildings or any other historic resources. Therefore, while the project's impact is considered to be significant, there are no related projects involving any historic resources or specifically, any buildings designed by Smith & Williams architects, and therefore cumulative impact will not be significant.

Fire and Police Protection Services

The project and the related projects are located within the Cal Poly Pomona campus and will be served by the University Police Department. All projects will incorporate comprehensive safety and security measures in new facilities, including alarm systems, safety and security lighting, and other features, and will provide all required emergency access. As appropriate, the project will also contribute to appropriate staffing of the University Police Department. Fire safety is will be incorporated in the design and construction of the project and related projects, and will include consultations with the Fire Marshal and University fire officials to ensure that all requirements are met. All required fire safety features, including smoke detectors and full sprinkler systems, fire lines and hydrants with appropriate fire flows, and unobstructed fire emergency access will be provided.

Therefore, while the provision of student replacement facilities by the project together with related projects will result in an incremental increase in demand for police and fire protection services, this increase will be minimized through implementation of

comprehensive safety and security measures in new facilities and appropriate staffing of the University Police Department, and cumulative impact will be less than significant.

Short-Term Construction Impacts

The Parking Structure 2 and the Innovation Village related projects will be completed and operational in 2016, and the construction of the Administration Building Replacement will be completed by Spring 2017. Therefore, the only overlap in construction activities between the project and related projects could occur in 2017 when the construction of the administration replacement building is being finalized while the construction of the project facilities is underway. The potential cumulative peak day emissions during this short overlap period are summarized in Table 19.

Table 19
Cumulative Peak Day Construction Emissions (pounds per day)

	Reactive Organic Gases (ROG)	Oxides of Nitrogen (NO _x)	Carbon Monoxide (CO)	Suspended Particulate Matter (PM10)	Suspended Particulate Matter (PM2.5)	GHG (CO ₂ e)
Administration Replacement Project *	26	17	25	3	2	4,211
Student Housing Replacement	71	97	82	27	15	14,076
Total	97	114	107	30	17	18,287
Threshold	75	100	550	150	55	-
Exceeds Threshold?	Yes	Yes	No	No	No	-

Note: The higher of winter or summer emissions are shown.

Based on daily maximum construction emissions during construction years.

* Emissions for the criteria air pollutants are based on the final year of construction for the Administration Replacement Project as reported in the "Administration Replacement Project EIR, October 2013"

Source: CalEEMod 2013, Version 2013.2.2.

As shown, short-term peak day construction emissions will be below the SCAQMD threshold amounts for criteria pollutants, except for ROG and NO_x emissions. Since the peak construction day emissions of ROG and NO_x could be above the threshold amount, this potential impact is considered significant. As part of the mitigation, both the Student Housing Replacement project and the related projects are required to implement a range of mitigation measures to reduce noise, solid waste, construction traffic and other site-specific impacts (see Section 3.7, Construction Effects), in addition to measures reducing air pollutant and greenhouse gas emissions. However, while the implementation of these measures will reduce cumulative emissions, the peak day emissions during the short period of time when the construction of the administration replacement building is being finalized while the construction of the project facilities is underway, still may exceed the SCAQMD thresholds for ROG and NO_x. Thus, the short-term cumulative construction impact is considered potentially significant.

Growth-Inducing Impacts

The CEQA Guidelines [Section 15126.2(d)] require a discussion of “... ways in which the proposed project could foster economic or population growth ... in the surrounding environment,” including the project’s potential to remove obstacles to population growth. For example, the extension of infrastructure may encourage or facilitate other activities that could significantly affect the environment.

The project provides for replacement of existing student housing facilities on campus, and additional student beds in its new replacement facilities. The project does not provide housing for residents of the city or the surrounding areas that could induce population growth, and will not result in an increase in student enrollment at Cal Poly Pomona. The project includes all necessary improvements to the existing infrastructure, and no excess capacity that could induce growth will be provided.

Significant Irreversible Effects

Implementation of the Student Housing Replacement project will commit non-renewable resources during construction and operation. During construction, the use of building materials (e.g., aggregate, sand, cement, steel, etc.) and energy resources (e.g., gasoline, diesel fuel, electricity) largely would be irreversible and irretrievable. Energy will be consumed in processing building materials and for transporting these materials and construction workers to the project site.

The project facilities can be expected to have a life span of approximately 50 years. Resources consumed during construction of the project, (such as fuel and building materials) will be used in quantities proportional to similar student housing development in Southern California and are not considered a wasteful use of resources. The nonrenewable resources consumed for this project are comparable to the use of resources for student housing at other major universities and colleges throughout the region and the country.

6.0 Preparers of the EIR

Lead Agency

The Board of Trustees of the California State University
401 Golden Shore
Long Beach, CA 90802

California Polytechnic University, Pomona
3801 West Temple Avenue
Pomona, CA 91768

Contact Person: Mooris L. Taylor, Senior Project Manager
Facilities Planning, Design & Construction

Phone: (909) 869-5173
Fax: (909) 869-2292

Consultant to the Lead Agency

WSP | Parsons Brinckerhoff
444 South Flower Street, Suite 800
Los Angeles, CA 90071

Phone: (213) 362-9470
Fax: (213) 362-9480

Irena Finkelstein, AICP, Project Manager
Responsibility: Overall preparation and coordination of EIR and environmental analysis

Gibson Transportation Consulting, Inc.
523 W. 6th Street, Suite 1234
Los Angeles, California 90014

Phone: (213) 683-0088
Fax: (213) 683-0033
Patrick Gibson, Project Manager

Responsibility: Preparation of traffic study

7.0 Responses to Comments

The Draft EIR for the project was made available for a 45-day public review and comment period pursuant to CEQA Guidelines Section 15105 and 15087, from May 31, 2016 to July 14, 2016.

The University held a public meeting to receive comments on the Draft EIR on June 28, 2016. No comments were received at the meeting.

Written comments were received from the following persons during the public review period for the Draft EIR.

1. Deidre West, Manager, Environmental Planning Team, Metropolitan Water District. June 20, 2016.
2. Adriana Raza, Customer Service Specialist, Facilities Planning Department, County Sanitation Districts of Los Angeles County. July 13, 2016.
3. Dianna Watson, Branch Chief, Community Planning & LD IGR Review, California Department of Transportation, District 7. July 13, 2016.
4. Scott Morgan, Director, State Clearinghouse. July 15, 2016.

1. Deidre West, Manager, Environmental Planning Team, Metropolitan Water District. June 20, 2016.

- 1-1** As with all projects within or near existing easements or facilities within the campus, the University will submit all Student Replacement Housing design plans for the Metropolitan Water District (Metropolitan) review and approval, and will pay all applicable fees or expenses associated with the review process.
- 1-2** Metropolitan is listed as a responsible agency for approval of construction within the MWD easement in the Draft EIR (pages 15 and 21).
- 1-3** Neither the existing student housing that will be replaced by the project nor the existing central plant that will be enlarged to provide greater capacity are located or involve activity on or near any Metropolitan easements or facilities within the Cal Poly campus. No Metropolitan easements or facilities will be affected.



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

Comment Letter 1

RECEIVED

JUN 28 2016

CAL POLY POMONA
Facilities Planning,
Design and Construction

June 20, 2016

Via Regular Mail

Mooris Taylor
Senior Project Manager
Facilities Planning, Design and Construction Building 81
California State Polytechnic University, Pomona
3801 W. Temple Avenue
Pomona, CA 91768

Dear Mr. Taylor

Review of the
Student Housing Replacement Project Draft Environmental Impact Report

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Draft Environmental Impact Report for the California State Polytechnic University, Pomona (Cal Poly Pomona) Student Housing Replacement Project in the City of Pomona, California. The project proposes to replace the existing student housing facilities and construct student housing with 1,645 beds, a dining facility, and associated surface parking on a 13-acre site that is currently used for horse pasture. Additionally, the project will realign Kellogg Drive, and requires the Board of Trustees of the California State University to approve a Major Campus Master Plan Revision and the Student Housing Replacement schematic plans. The project is generally bounded by Kellogg Drive to the west and south, Campus Drive to the east, and campus facilities to the north. Cal Poly Pomona is acting as the CEQA Lead Agency. This letter contains Metropolitan's comments to the proposed project as a Responsible Agency under CEQA.

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies serving approximately 19 million people in portions of six counties in Southern California, including Los Angeles County. Metropolitan's mission is to provide its 5,200 square mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.

Metropolitan owns and operates the 39-inch-inside-diameter Orange County Feeder within the proposed project area. The Orange County Feeder extends through the western boundary of the proposed student housing development, paralleling Eucalyptus Lane and bisecting the current alignment of Kellogg Drive.

Mooris Taylor
Page 2
June 20, 2016

Comment

Based on a review of the proposed project boundaries, the project has potential to impact Metropolitan's Orange County Feeder. The construction of the new student housing, realignment of Kellogg Drive, and likely relocation or installation of project utilities will require construction over the feeder within a Metropolitan easement. Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to its facilities in order to maintain and repair its system. In order to avoid potential conflicts with Metropolitan's facilities and rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Metropolitan will not approve construction facilities that may impact Metropolitan pipelines, water quality, or operations. Metropolitan will not permit procedures that could subject the pipe to excessive vehicle, impact or vibratory loads. Any future design plans associated with this project should be submitted to the attention of Metropolitan's Substructures Team. Approval of the project should be contingent on Metropolitan's approval of design plans for portions of the proposed project that could impact its facilities.

1.1

The construction of the Student Housing Replacement Project may require the use of Metropolitan easements. Easement requests are vetted by staff, subject to applicable fees or expenses, and subject to Metropolitan Board approval. Additionally, Metropolitan requests to be included as a potential Responsible Agency under CEQA in the project Draft Environmental Impact Report in order to facilitate future project-related easement approvals and requires that any and all mitigation measures proposed in the Student Housing Replacement Project EIR not be implemented on Metropolitan-owned property.

1.2

While the Student Housing Replacement Project Draft EIR describes the construction of the proposed new student housing, the nature of the demolition of the current housing, relocation of utilities, the Kellogg Road realignment, and the nature of the improvements to the central plant are not described, though mentioned in the project description. Metropolitan requests that these aspects of the proposed project be more thoroughly described in order to determine what impacts, if any, they pose to Metropolitan facilities in the project area.


1.3

Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-6564. To assist the applicant in preparing plans that are compatible with Metropolitan's facilities and easements, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easement of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

Mooris Taylor
Page 3
June 20, 2016

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation and plans for this project. For further assistance, please contact Ms. Michelle Morrison at (213) 217-7906.

Very truly yours,


for Deirdre West
Manager, Environmental Planning Team

MM/mm

(Job No. 20160601EXT)

Enclosures: Planning Guidelines and Map of Metropolitan Facilities in Project Vicinity

**2. Adriana Raza, Customer Service Specialist, Facilities Planning Department,
County Sanitation Districts of Los Angeles County, July 13, 2016.**

- 2-1** As indicated in the Draft EIR, the information about the wastewater generation is based on actual water use data at the Cal Poly Pomona student housing, and that data provides both most specific, current and reliable water use and wastewater generation factors appropriate for the project.
- 2-2** The information that the County Sanitation District No. 21 Outfall Trunk Sewer is located southwest of the intersection of Valley Boulevard and Pomona Boulevard has been included in the EIR. Information that this 27-inch diameter trunk sewer has a design capacity of 19.4 million gallons per day (mgd), was provided on page 57 in the Draft EIR.
- 2-3** The comment that other information concerning District's facilities and sewerage service contained in the Draft EIR is current, is acknowledged.



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

July 13, 2016
Ref Doc. No.: 3747993

Comment Letter 2

RECEIVED

Mr. Mooris L. Taylor
Senior Project Manager
Facilities Planning, Design & Construction
California State Polytechnic University - Pomona Campus
3801 West Temple Avenue
Pomona, CA 91768

JUL 20 2016

CAL POLY POMONA
Facilities Planning,
Design and Construction

Dear Mr. Taylor:

Comment Letter for the Student Housing Replacement Project

Comment

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on May 31, 2016. The proposed project is located within the jurisdictional boundaries of District No. 21. We offer the following comments:

3.4 Utilities and Service Systems, Hydrology and Water Quality,

1. Sewer, page 50, top of page – The expected average wastewater flow from the proposed project, described in the document as 245 additional beds on campus, is 18,375 gallons per day. For a copy of the Districts’ average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link. 2-1
2. Sewer, page 56, second paragraph – The wastewater flow from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts’ District No. 21 Outfall Trunk Sewer Section 2D, located in a private right of way southwest of the intersection of Valley Boulevard and Pomona Boulevard. This Districts’ 27-inch diameter trunk sewer has a capacity of 19.3 million gallons per day (mgd). 2-2
3. All other information concerning Districts’ facilities and sewerage service contained in the document is current. 2-3

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: M. Sullivan
M. Tatalovich

3. Dianna Watson, Branch Chief, Community Planning & LD IGR Review, California Department of Transportation, District 7. July 13, 2016.

- 3-1** As discussed in the Draft EIR, the proposed student replacement project has no potential to result in a significant cumulative impact on the existing freeway system, since the project provides opportunities for students to live and study on campus, and in turn reduces the number of long distance commuting trips to campus (average one-way distance of 13 miles) which would otherwise occur without the project. The project is a replacement of the existing student housing on campus and provision of additional housing for 245 students. In fact, based on the VMT calculation as discussed in the Draft EIR, the reduction in home-to-school commuting trips will reduce overall VMTs by approximately 3,970 miles per day, mostly freeway miles. The provision of additional student housing results in the beneficial effect of reducing daily vehicular travel, including travel on the freeway system. Furthermore, the trip generation calculated for the proposed project is highly conservative for the purpose of capturing local trips that can occur for routine weekday daily activities, such as going to restaurants, grocery shopping, entertainment, or other errands to local establishments by students living on campus, which only add a total of 13 trips in the AM peak hour and 8 trips in the PM peak hour by 2019 to the entire surrounding street system (Draft EIR Table 3, page 33).

Moreover, the trip generation and distribution analysis was conducted in the traffic study and included in the Draft EIR (Draft EIR Appendix B, page 46). As shown in the Draft EIR, using a very conservative assumption, the project is expected to generate fewer than 2 new net trips in any direction on any of the freeways (I-10, SR-57, and SR-71) within the study area under the “worst case” scenario. Even per Caltrans’ Traffic Impact Studies (TIS) Guidelines, a TIS is only required when the proposed project is projected to generate 50 or more peak hour trips to a State highway/freeway facility. Since the project will generate fewer than 2 peak hour trips in any direction, it does not meet the 50-trip threshold.

Furthermore, under the existing conditions, based on Caltrans PeMS traffic data along I-10, SR-57, and SR-71 freeways only one location (Westbound I-10 w/o SR-57 – PM peak hour LOS “E”) is operating at LOS “E” based on HCM 2010 methodology calculations. Under With Project Conditions, with additional 2 vehicular trips that LOS remains at “E” with no increase in density. Therefore, the project does not result in a significant cumulative impact on the existing highway system.

In addition, as indicated in the comment “Caltrans encourages the lead agency to consider vehicle demand-reducing strategies”, the University has been and continues to implement a comprehensive program of such strategies, which include provision of on-campus housing for students enrolled at the University that eliminates daily vehicular commute trips that would otherwise be made by students housed outside of campus to attend classes on campus. Provision of housing near

where people work or attend school is a fundamental smart growth strategy that reduces vehicle demand, and the project implements this strategy by providing housing on campus for students attending classes on campus.

- 3-2** The comment citing existing requirements with respect to oversize transport vehicles and design for discharge of clean runoff water, is acknowledged. Same as all University facilities, the student housing replacement facility will be designed and constructed in compliance with all applicable requirements and regulations.

DEPARTMENT OF TRANSPORTATION
 DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
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July 13, 2016

Mr. Mooris Taylor
 California State Polytechnic University, Pomona
 3801 West Temple Avenue
 Pomona, CA 91768

Comment Letter 3

RE: Student Housing Replacement
 Draft Environmental Impact Report
 SCH#2015111042, IGR#160615-FL
 Vic. LA/10/PM 41.85, LA/57/PM 6.489

Dear Mr. Taylor:

Comment

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project.

The proposed project, the new student residence facilities, will provide student housing with 1645 beds, which replaces 1400 beds in existing residence halls as well as provide 245 additional beds on campus; and a dining facility and associated surfaces parking. The facilities are anticipated to be developed in two phases, with approximately 980 beds provided by 2019, and the remaining 665 beds by 2022. As each phase of the student housing facilities is completed, the existing student housing facilities that are being replaced will be removed.

Also, the proposed project includes shifting a segment of Kellogg Drive to the east, placing it along the eastern boundary of the site, and separating the site from the horse pasture to the east.

On page 33 of the Draft EIR, the project would generate a net 300 new daily trips with 13/28 AM/PM peak hour trips. Based on this information, the project may not have a direct adverse impact to the existing state facilities. However, when traffic is added to already deficient highway conditions (LOS "F"), it is considered a cumulative significant impact, as it may contribute to the extension of the congestion period and deterioration of safety.

CEQA guidelines (article 5, section 15064h), states that cumulative effects also need to be considered. Given that project trip would be added to already deficient operating conditions and potential resulting in extending duration of peak period congestion on I-10 and SR-57, the incremental effect of the project, combined with the effects of other past, present and reasonably foreseeable future projects, would be cumulatively considerable.

Caltrans continues to strive to improve its standards and processes to provide flexibility while maintaining the safety and integrity of the State's transportation system. It is our goal to implement strategies that are in keeping with our mission statement, which is to *"provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability."*

Good geometric and traffic engineering design to accommodate bicyclists and pedestrians are critical at every on and off ramp and freeway terminus intersection with local streets. Caltrans will work with the lead agency to look for every opportunity to develop projects that improve safety and connectivity for pedestrians and bicyclists. Opportunities for improvements may exist on State facilities such as: freeway termini, on/off-ramp intersections, overcrossings, under crossings, tunnels, bridges, on both conventional state highways and freeways.

With regard to public transit, we recommend planning for gradual continual improvement of transit stops, bus bays, or other facilities, to accommodate traffic flow, especially on streets that are State Route locations or are near freeway intersections.

3-1

Caltrans encourages the lead agency to consider vehicle demand-reducing strategies, including incentives for commuters to use transit, park-and-ride lots, discounts on monthly bus and rail passes, shuttle buses, vanpools, etc. To the extent that more of the population shifts to transit for some of their inter-regional trips, future cumulative traffic impacts to freeways may be satisfactorily mitigated.

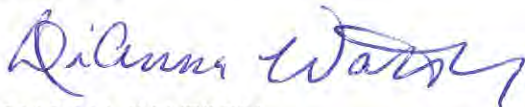
As a reminder, any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods.

3-2

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that project needs to be designed to discharge clean run-off water.

If you have any questions or concerns regarding these comments, please contact project coordinator, Frances Lee at (213) 897-0673 or electronically at frances.lee@dot.ca.gov.

Sincerely,



DIANNA WATSON
Branch Chief, Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

4. Scott Morgan, Director, State Clearinghouse. July 15, 2016.

- 4-1** The information that the University complied with the State Clearinghouse review requirements is acknowledged. No response is required.



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

July 15, 2016

Comment Letter 4

RECEIVED

JUL 20 2016

Mooris Taylor
California State University, Pomona
3801 W. Temple Avenue
Pomona, CA 91768

CAL POLY POMONA
Facilities Planning,
Design and Construction

Subject: Student Housing Replacement
SCH#: 2015111042

Dear Mooris Taylor:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 14, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2015111042
Project Title Student Housing Replacement
Lead Agency California State University, Pomona

Type EIR Draft EIR
Description Project provides student housing replacement facilities on campus 1,645 beds, a dining facility, and associated surface parking on a 13- acre site in the southeastern area of the campus.

Lead Agency Contact

Name Mooris Taylor
Agency California State University, Pomona
Phone 909-869-5173 **Fax**
email
Address 3801 W. Temple Avenue
City Pomona **State** CA **Zip** 91768

Project Location

County Los Angeles
City Pomona
Region
Lat / Long
Cross Streets Within Cal Poly Pomona campus interior - Kellogg Drive on the East
Parcel No.

Township	Range	Section	Base
-----------------	--------------	----------------	-------------

Proximity to:

Highways I-10, SR 57
Airports
Railways UP/BNSF
Waterways
Schools Various
Land Use Horse pasture /campus master plan - horse pasture

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Public Services; Sewer Capacity; Solid Waste; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services, California; California Highway Patrol; Caltrans, District 7; State Water Resources Control Board, Division of Drinking Water, District 16; Department of General Services; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

Date Received 05/31/2016 **Start of Review** 05/31/2016 **End of Review** 07/14/2016

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JUL 13 2016

STATE CLEARINGHOUSE

July 13, 2016

Mr. Mooris Taylor
 California State Polytechnic University, Pomona
 3801 West Temple Avenue
 Pomona, CA 91768

clear

67/14/16 E

RE: **Student Housing Replacement**
 Draft Environmental Impact Report
 SCH#2015111042, IGR#160615-FL
 Vic. LA/10/PM 41.85, LA/57/PM 6.489

Dear Mr. Taylor:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project.

The proposed project, the new student residence facilities, will provide student housing with 1645 beds, which replaces 1400 beds in existing residence halls as well as provide 245 additional beds on campus; and a dining facility and associated surfaces parking. The facilities are anticipated to be developed in two phases, with approximately 980 beds provided by 2019, and the remaining 665 beds by 2022. As each phase of the student housing facilities is completed, the existing student housing facilities that are being replaced will be removed.

Also, the proposed project includes shifting a segment of Kellogg Drive to the east, placing it along the eastern boundary of the site, and separating the site from the horse pasture to the east.

On page 33 of the Draft EIR, the project would generate a net 300 new daily trips with 13/28 AM/PM peak hour trips. Based on this information, the project may not have a direct adverse impact to the existing state facilities. However, when traffic is added to already deficient highway conditions (LOS "F"), it is considered a cumulative significant impact, as it may contribute to the extension of the congestion period and deterioration of safety.

CEQA guidelines (article 5, section 15064h), states that cumulative effects also need to be considered. Given that project trip would be added to already deficient operating conditions and potential resulting in extending duration of peak period congestion on I-10 and SR-57, the incremental effect of the project, combined with the effects of other past, present and reasonably foreseeable future projects, would be cumulatively considerable.

Caltrans continues to strive to improve its standards and processes to provide flexibility while maintaining the safety and integrity of the State's transportation system. It is our goal to implement strategies that are in keeping with our mission statement, which is to "provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability."

Mr. Mooris Taylor

07/13/2016

Page 2

Good geometric and traffic engineering design to accommodate bicyclists and pedestrians are critical at every on and off ramp and freeway terminus intersection with local streets. Caltrans will work with the lead agency to look for every opportunity to develop projects that improve safety and connectivity for pedestrians and bicyclists. Opportunities for improvements may exist on State facilities such as: freeway termini, on/off-ramp intersections, overcrossings, under crossings, tunnels, bridges, on both conventional state highways and freeways.

With regard to public transit, we recommend planning for gradual continual improvement of transit stops, bus bays, or other facilities, to accommodate traffic flow, especially on streets that are State Route locations or are near freeway intersections.

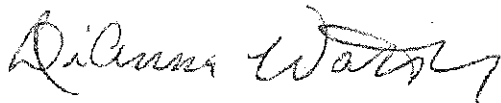
Caltrans encourages the lead agency to consider vehicle demand-reducing strategies, including incentives for commuters to use transit, park-and-ride lots, discounts on monthly bus and rail passes, shuttle buses, vanpools, etc. To the extent that more of the population shifts to transit for some of their inter-regional trips, future cumulative traffic impacts to freeways may be satisfactorily mitigated.

As a reminder, any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that project needs to be designed to discharge clean run-off water.

If you have any questions or concerns regarding these comments, please contact project coordinator, Frances Lee at (213) 897-0673 or electronically at frances.lee@dot.ca.gov.

Sincerely,



DIANNA WATSON

Branch Chief, Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse