

**Attachment C**

#### **XIV. STATEMENT OF OVERRIDING CONSIDERATIONS**

CEQA allows a public agency to approve a project with significant, unavoidable impacts if the agency finds that the project will provide overriding economic, social, or other benefits.

##### **A. SIGNIFICANT, UNAVOIDABLE IMPACTS**

The City Council hereby finds that the Project would or could have significant, unavoidable impacts on the following areas, as described in Sections IX and X of these Findings:

- Short-term Air Quality (Direct and Cumulative)
- Long-term Air Quality (Direct and Cumulative)
- Noise (exterior sound levels)
- Transportation/Traffic (Direct and Cumulative)
- Parks and Recreation
- Solid Waste (cumulative only)

The City has adopted all feasible measures with respect to these impacts. Although in some instances mitigation measures may substantially lessen these significant impacts, adoption of such measures may not fully avoid the impacts or mitigate them to below a level of significance.

The City has examined a reasonable range of alternatives to the Project, including the No Project alternative (Future Year 2015 conditions without the project) described in the Final Program EIR. Based on this examination, the City has determined that Alternative 3A: Proposed Project and Extension of the Gold Line to Claremont and Alternative 7: Physical Improvements to Improve Traffic Flow would also build upon the Project objectives and should be added to the Project. The City has also determined that the No Project alternative would have greater traffic impacts than the Project. In addition, all of the alternatives examined would have significant and unavoidable environmental impacts.

As a result, to approve the Project, the City must adopt a "statement of overriding considerations" pursuant to CEQA Guidelines Sections 15043 and 15093. This statement allows the lead agency to cite a project's general economic, social, or other benefits as a justification for choosing to allow the occurrence of specified significant environmental effects that have not been avoided. The statement explains why, in the agency's judgment, the project's benefits outweigh the unavoidable significant effects.

CEQA does not require lead agencies to analyze beneficial effects in an EIR. Rather, EIRs are to focus on potential "significant effects on the environment," which are defined to be adverse impacts (Public Resources Code Section 21068). The Legislature amended the definition to focus on adverse impacts after the California Supreme Court had held that beneficial impacts must also be addressed (see Wildlife Alive v. Chicering, 18 Cal.3d 190, 206, 132 Cal.Rptr. 377 [1976]). Nevertheless, decision makers benefit from information about Project benefits. These benefits can be cited, if necessary, in a statement of overriding considerations (see California Code Regulations Title 14, Section 15093).

## B. PROJECT BENEFITS

The City finds that the Project would have the following substantial economic, legal, social, technological, or other benefits that outweigh the unavoidable adverse environmental effects of the Project, and the adverse environmental effects are considered acceptable when any one of the following project benefits are considered.

1. **Growth will be targeted to serve community need and enhance the quality of life.** The pattern of development established by the Land Use Element and Central District Specific Plan — and implemented by the comprehensive Zoning Code — focuses growth within the Central District to avoid sprawl, make maximum use of existing Gold Line light rail stations at Del Mar, Memorial Park, and Lake Avenue, and encourage pedestrian movement as an alternative to cars. Growth will be targeted to areas of Pasadena that are well served by public transit and provide opportunities for residences, retail businesses, and employment centers to be located close to one another. This approach to development encourages street level economic development by putting pedestrians in close proximity to retail, restaurant, and commercial/office uses. Residents could work, live, shop, and play in transit-oriented areas encouraging economic growth and reducing automobile dependence. In this way, the Project promotes smart growth principles that call for compact, pedestrian-friendly districts that minimize the amount of open space lands that would be converted to urban uses. This approach to development reduces new vehicle trips resulting from new development and correspondingly, reduces traffic and associated air pollutant emissions. In this respect, this pattern of development benefits Pasadena and the region.
2. **Community Participation will be a permanent part of achieving a greater city.** The Project continues the growth parameters endorsed by 1994 voter referendum and built into the City's 1994 General Plan. In 1992, Pasadena voters approved Measure O affirming a new draft Land Use Element, which reduced development capacity and directed development to targeted growth areas, by repealing a 1989 initiative which set annual limits on growth. Targeted growth potential was identified for districts citywide as follows:

Specific Plan Area	Existing Development (1994)		1994 Land Use Element			
			Estimated Potential Net New Development (1994-Buildout)		Estimated Potential Total Development (Buildout)	
	Residential Units	Non- Residential Square Footage	Residential Units	Non- Residential Square Footage	Residential Units	Non- Residential Square Footage
Central District	2,675*	20,217,748	5,095	6,217,000	7,770*	26,434,748
South Fair Oaks	2	2,196,386	300	1,550,000	302	3,746,386
West Gateway	69	925,304	75	800,000	144	1,194,054
East Pasadena	141	5,018,267	400	2,100,000	541	7,118,267
East Colorado	0	1,442,261	750	650,000	750	2,092,261
North Lake	350	714,783	500	175,000	850	889,783
Fair Oaks/Orange Grove	990	1,650,585	150	500,000	1,140	2,263,318
Specific Plan Area Total	4,227*	32,165,334	7,270	11,992,800	11,497*	43,738,817

Outside Specific Plan	48,215*	7,761,628	3,431	4,848,215	53,307*	12,264,623
Citywide Total	52,442	39,926,962	10,701	16,840,215	64,804	56,003,440

Source: 1994 General Plan

\*Consistent with the approach used in the 1994 General Plan, 3,600 existing residential units, within the CD7 and CD7A zoning subdistricts (In-Town Housing), are counted with units outside the specific plan areas. The existing 3,600 units are included in this table with existing and total units in RM-32 and RM-48 districts "Outside Specific Plan areas."

The Project substantially retains these parameters and thus supports policy endorsed by voter initiative.

3. **Pasadena will be promoted as a cultural, scientific, corporate, entertainment, and educational center for the region.** The Project allows for up to 4.97 million square feet of net new nonresidential development in the form of commercial, office, and industrial space. This additional space will add opportunities to create new jobs, building improvements, retention of the best companies, a diverse economy, and infrastructure.

**Job Growth:** The unemployment and underemployment of Pasadena residents contributes to a wide variety of social concerns that must be addressed. General Plan and zoning policies must be careful to not force artificially low caps on commercial growth and potential jobs and impede the community's ability to improve various social challenges. The plan's allowance for new commercial space would accommodate average annual employment growth of approximately 1.5 percent until 2015. Despite year-to-year changes in employment figures, overall job growth is an important component of confronting Pasadena's unemployment challenges. Pasadena companies involved with finance, engineering, research, and healthcare have people as their key asset. These companies must utilize office space to conduct business and must adjust their use of commercial space based on the number of staff.

**Building Improvements:** Maintaining reasonable allowances for new building is conducive to improving the city's overall building stock. The gradual introduction of new buildings into the city's commercial and residential rental market creates a healthy motivation for existing building owners to upgrade and stay competitive. Having a very low vacancy rate in commercial buildings, with no new space available, discourages reinvestment into the existing building stock as owners grow complacent and avoid building improvements due to very high demand for existing space. Currently, Pasadena's 8% office vacancy rate in the Class "A" market is consistently among the lowest in Southern California.

**Retention of the Best Companies:** High-growth companies that successfully create new products often grow at a tremendous pace. Although Pasadena does retain some of these companies, the city often struggles to keep the most successful enterprises. Unfortunately, these are the types of companies that can contribute significantly to the community by supporting local charities and providing local employees with resources uncommon to smaller businesses. Even a mild track record of losing these successful companies has the potential of creating negative momentum. Presuming the future need to expand, these companies then take an earlier look at moving to communities more likely to support business growth.

**Diverse Economy:** Pasadena has been fortunate to maintain a diverse set of business sectors. Finance, engineering, retail, education, research, and healthcare contribute

significantly to the collective community income. This diverse economy helps with a wide variety of issues such as preventing severe fluctuations in the local job market, helps stabilize revenues for municipal services and strengthens the city's bond rating. Unfortunately, finance, engineering, and research companies oriented to regional or international markets are mobile when considering office locations. These companies can consider many different sites within their employment radius. Without a gradual increase in commercial space instigated by supply and demand, successful technology, design, and financial companies, would have a hard time staying in Pasadena. Such an overly constrained commercial market would gradually favor businesses focused on a local market. Service and retail businesses that must be in Pasadena will outbid the companies that can move to an adjacent city or other state.

Although retailers provide important services, entry-level jobs, and entrepreneurial opportunities, they must be part of a balanced economic mosaic. For example, two viable sectors currently in Pasadena are compared: Finance and Insurance, and retail trade. With an annual average salary of \$66,670 (LA County, 2001), the Finance and Insurance industry is well represented in Pasadena. IndyMac Bank, Bolton Insurance, Western Asset Management, and Community Bank could easily move their headquarters out of Pasadena. In contrast, the retail sector has an average annual salary of \$24,540 (LA County 2001).

**Infrastructure:** A common generalization directed to new development projects is that they put added strain on services and infrastructure. Although there are specific areas in the city that require street, sewer, or some other upgrades, each new development project supports (through fees and off site requirements) infrastructure upgrades to nearby streets, storm drains, streetlights, sidewalks, street trees, and street signals. The General Plan update specifically directs growth to areas where it is best supported by existing infrastructure and services and would require fewer infrastructure improvements. In addition, new development creates significant contributions to public art through the required 1% fee.

4. **Pasadena will be a place where people can circulate without cars.** The Project meets the goals of the City expressed in the 1994 General Plan and carried forward in the 2004 Land Use Element and Mobility Element to make Pasadena a place where people can circulate without cars. With the increased ability of the City to focus new development at locations served by transit, the City can better manage its own ARTS bus system and encourage use of buses and the Gold Line light rail. Land use policy will facilitate managed growth that can create the critical user mass needed to support expanded alternative transportation systems.
5. **Pasadena will be promoted as a healthy family community.** Opportunities for the development of affordable housing will be expanded. In 2003, the City approved Ordinance 6868, which, for new housing development projects, requires the provision of affordable housing units with those projects or the payment of an in-lieu fee. The Project will allow for the construction of up to 6,581 net new housing units in Pasadena by horizon year 2015. Based only on the requirement of Ordinance No. 6868 that 15% of the units be affordable units (or equivalent fees paid to provide for construction of such units), up to 987 new affordable units could be provided in Pasadena.

Residential neighborhoods will be protected from adverse traffic conditions. Mobility Element policies call for through traffic to be directed to travel corridors that avoid residential neighborhoods and specifically: Marengo Avenue between Del Mar Boulevard and the South City limit, Los Robles Avenue between Del Mar Boulevard and the South City limit, All

of El Molino Avenue within City limits, Orange Grove Boulevard between Columbia Street and Colorado Boulevard, Hill Avenue between the I-210 Freeway and the North City limit, All of Washington Boulevard within City limits, California Boulevard between Orange Grove Boulevard and St. John Avenue, and California Boulevard between Lake Avenue and East City limit. This approach to traffic management will result in higher traffic volumes along key street segments and at intersections that directly serve freeways. In this manner, cut-through traffic on residential streets will be avoided, thereby slowing traffic speeds in residential neighborhoods, enhancing traffic safety, and protecting the character of neighborhoods.

For the reasons cited above, the City finds that the Project's adverse, unavoidable environmental impacts are outweighed by these considerable benefits.

**FINDINGS OF FACT AND  
STATEMENT OF OVERRIDING CONSIDERATIONS  
FOR THE CITY OF PASADENA  
2004 LAND USE AND MOBILITY ELEMENTS, ZONING CODE  
REVISIONS, AND CENTRAL DISTRICT SPECIFIC PLAN  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

**I.  
INTRODUCTION**

The Final Program Environmental Impact Report (EIR) prepared for this project addressed the potential environmental effects of the adoption and long-term implementation of the City of Pasadena 2004 Land Use and Mobility Elements of the General Plan, Title 17 of the Pasadena Municipal Code (Zoning Code) Revisions, and the Central District Specific Plan. The adoption and implementation of General Plan elements, Municipal Code revisions, and a Specific Plan constitute a project and require analysis of the environmental effects in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines. The Final Program EIR will be used by the City and other responsible agencies to provide information necessary for environmental review of discretionary actions related to adoption of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and the Central District Specific Plan.

**II.  
DEFINITIONS**

"Applicant" means the City of Pasadena.

"Approved Project" or "Project" means the City of Pasadena 2004 Land Use and Mobility Elements, Title 17 of the Pasadena Municipal Code (Zoning Code) Revisions, and the Central District Specific Plan, as described in the Draft Program EIR and the Final Program EIR.

"CEQA" means the California Environmental Quality Act, Public Resources Code Sections 21000-21178.1.

"CEQA Guidelines" means the State of California Guidelines for Implementation of the California Environmental Quality Act, California Code Regulations Title 14 Sections 15000 to 15387.

"City" means the City of Pasadena, California.

"CNEL" means the Community Noise Equivalent Level.

"CO" means carbon monoxide.

"County" means the County of Los Angeles.

"Council" means the City of Pasadena City Council.

"dB(A)" means decibels on the "A"-weighted scale.

"Draft Program EIR" means the Draft Program Environmental Impact Report for the City of Pasadena 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan, dated June 3, 2004.

"EIR" means an environmental impact report.

"Final Program EIR" means the Program Environmental Impact Report for the City of Pasadena 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan, dated September 2004.

"Initial Study" means the Initial Study for the City of Pasadena General Plan Land Use and Mobility Elements, Central District Specific Plan, and Zoning Code Revision, dated March 2003.

"LOS" means level of service.

"MMRP" means the Mitigation Monitoring and Reporting Program.

"MWD" means the Metropolitan Water District of Southern California.

"NO<sub>x</sub>" means nitrogen oxides.

"NPDES" means the National Pollutant Discharge Elimination System.

"PM<sub>10</sub>" means particulate matter less than 10 microns in diameter, or respirable particulate matter.

"Project" means the City of Pasadena 2004 Land Use and Mobility Elements, Title 17 of the Pasadena Municipal Code (Zoning Code) Revisions, and the Central District Specific Plan as described in the Draft Program EIR and the Final Program EIR.

"ROG" means reactive organic gases.

"RHNA" means Regional Housing Needs Assessment.

"SCAG" means the Southern California Association of Governments.

"SCAQMD" means the South Coast Air Quality Management District.

"STC" means sound transmission class.

"SUSMP" means the Standard Urban Stormwater Mitigation Plan.

"State" means the State of California.

"V/C" means volume-to-capacity ratio.



### **III. PROJECT DESCRIPTION**

The project is the adoption and implementation of the:

- 2004 Land Use and Mobility Elements of the City of Pasadena General Plan
- Title 17 of the Pasadena Municipal Code (Zoning Code) Revisions
- Central District Specific Plan

The 2004 Land Use and Mobility Elements, together with other already adopted General Plan elements, guide the overall development of Pasadena. The 2004 Land Use and Mobility Elements establish goals and policies to guide long-term decision-making regarding land use, mobility, public safety, and related issues. The 2004 General Plan encompasses all properties within the City of Pasadena, as well as lands within the City's sphere of influence.

The Zoning Code is the primary tool for implementing land use plans and policies contained in the 2004 General Plan and Central District Specific Plan, as well as for implementing specific plans applicable to other areas of the City. This project involves a comprehensive revision of the Zoning Code to reflect current City land-use policy, to simplify administrative procedures, and to make the Code easier to use. The revised Zoning Code divides the City into areas called zoning districts and establishes regulations for each district with respect to permitted uses, allowable density, building height, development character, etc. The Zoning Code Revisions serve as the mechanism to achieve the goals, policies, and development expectations established in the General Plan and each of the specific plans. Under California law, the Zoning Code must be consistent with the General Plan. Although Section 65803 provides an exemption for charter cities, such as Pasadena, it is the policy of the City generally to achieve such consistency.

Within the framework of the 2004 General Plan, the Central District Specific Plan sets forth development policy for all properties within the City's Central District. Consistent with the City's land use policy set forth in the 2004 General Plan, the majority of development within Pasadena through horizon year 2015 will be focused within the Central District. Thus, the Specific Plan establishes district-wide planning concepts to ensure that future development is both balanced and of high quality to maintain and enhance the unique characteristics of Pasadena's urban core. The Specific Plan identifies maximum land use intensities for all uses within the District, establishes design principles, and outlines specific mobility goals regarding the Gold Line light rail service and other regional and local transit services.

#### **Discretionary Actions**

The discretionary actions which will or may in the future be taken by the decision makers in approving this Project and which are covered by the Final Program EIR include:

Responsible Agency	Action
Pasadena City Council	Adoption of the 2004 Land Use and Mobility Elements  Adoption of Zoning Code Revisions (Title 17 of the Pasadena Municipal Code)  Adoption of the Central District Specific Plan
Pasadena Planning Commission	Recommendation to City Council to adopt the 2004 Land Use and Mobility Elements  Recommendation to City Council to adopt Zoning Code Revisions (Title 17 of the Pasadena Municipal Code) Recommendation to City Council to adopt the Central District Specific Plan  Recommendation to City Council to adopt any ordinances, guidelines, programs, or other mechanisms that implement 2004 Land Use and Mobility policy
Other City Commissions	Recommendation to City Council to adopt any ordinances, guidelines, programs, or other mechanisms that implement 2004 Land Use and Mobility Elements, the Zoning Code Revisions (Title 17 of the Pasadena Municipal Code), and the Central District Specific Plan
Others as necessary	Adoption of plans and programs tangential to the Pasadena 2004 General Plan and Central District Specific Plan

#### IV. RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the Record of Proceedings for the Project consists of the following documents, at a minimum:

- The Notice of Preparation and all other public notices issued by the City in conjunction with the Project;
- The Draft Program EIR;
- The Final Program EIR;

- All comments submitted by agencies or members of the public during the public comment period on the Draft Program EIR;
- All comments and correspondence submitted to the City with respect to the Project, in addition to timely comments on the Draft Program EIR;
- The Mitigation Monitoring and Reporting Program;
- All findings and resolutions adopted by the Council decision makers in connection with the Project, and all documents cited or referred to therein;
- All final reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by the City, consultants to the City, or responsible or trustee agencies with respect to the City's compliance with the requirements of CEQA and with respect to the City's actions on the Project;
- All documents submitted to the City by other public agencies or members of the public in connection with the Project, up through the close of the public hearing;
- Minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by the City in connection with the Project;
- Any documentary or other evidence submitted to the City at such information sessions, public meetings, and public hearings;
- Matters of common knowledge to the City, including, but not limited to federal, state, and local laws and regulations;
- Any documents expressly cited in these Findings, in addition to those cited above; and
- Any other materials required to be in the record of proceedings by Section 21167.6(e) of CEQA.

The custodian of the documents comprising the record of proceedings is the City Clerk, whose office is located at 117 East Colorado Boulevard, Pasadena, CA 91105. Copies of all these documents, which constitute the record of proceedings upon which the City's decision is based, are and at all relevant times have been available upon request at the offices of the City, the custodian for such documents or other materials.

The Council has relied on all of the documents listed above in reaching its decision on the Project, even if not every document was formally presented to the Council or City Staff as part of the City files generated in connection with the Project. Without exception, any documents set forth above not found in the Project files fall into one of two categories. First, many of them reflect prior planning or legislative decisions of which the Council was aware in approving the Project. (See City of Santa Cruz v. Local Agency Formation Commission 76 Cal.App.3d 381, 391-392, 142 Cal.Rptr. 873 [1978]; Dominey v. Department of Personnel Administration, 205 Cal.App.3d 729, 738, n.6, 252 Cal.Rptr. 620 [1988].) Second, other of the documents influenced the expert advice provided to City Staff or consultants, who then provided advice to the City. For that reason, such documents form part of the underlying factual basis for the City's decisions relating to the adoption of the Project. (See Public Resources Code Section 21167.6[e][10]; Browning-Ferris Industries v. City Council of City of San Jose, 181 Cal.App.3d

852, 866, 226 Cal.Rptr. 575 [1986]; Stanislaus Audubon Society, Inc. v. County of Stanislaus, 33 Cal.App.4th 144, 153, 155, 39 Cal.Rptr.2d 54 [1985].)

The Final Program EIR was completed in compliance with CEQA, and reflects the City's independent judgment. The Council believes that its decision on the Project is one which must be made after a hearing required by law at which evidence is required and discretion in the determination of facts is vested in the City. As a result, any judicial review of the City's decision will be governed by Section 21168 of CEQA and Code of Civil Procedure Section 1094.5. Regardless of the standard of review which is applicable, the Council has considered evidence and arguments presented to the City prior to or at the public hearings on this matter. In determining whether the Project has a significant impact on the environment, and in adopting Findings pursuant to Section 21081 of CEQA, the Council has complied with CEQA Sections 21081.5 and 21082.2.

## **V. FINDINGS REQUIRED UNDER CEQA**

Section 21002 of CEQA provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would *substantially lessen* the significant environmental effects of such projects[.]" (Public Resources Code Section 21002 [emphasis added]). The same statute states that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will *avoid* or *substantially lessen* such significant effects." *Id.* (emphasis added). Section 21002 goes on to state that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects." *Id.*

The mandate and principles announced in Public Resources Code Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See Public Resources Code Section 21081[a]; California Code Regulations Title 14 Section 15091[a].) For each significant environmental effect identified in any EIR for a proposed project, the approving agency must issue a written finding reaching one or more of three permissible conclusions. The first such finding is that "[c]hanges or alterations have been required in, or incorporated into, the projects which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (California Code Regulations Title 14 Section 15091[a][1].) The second permissible finding is that "[s]uch changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency." (California Code Regulations Title 14 Section 15091[a][2].) The third potential conclusion is that "[s]pecific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR." (CEQA Guidelines, Section 15091[a][3].) Public Resources Code Section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors." CEQA Guidelines Section 15364 adds another factor: "legal" considerations. (See also Citizens of Goleta Valley v. Board of Supervisors ["Goleta II"], 52 Cal.3d 553, 565, 276 Cal.Rptr. 410 [1990].)

The concept of "feasibility" also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego*, 133 Cal.App.3d 410, 417, 183 Cal.Rptr. 898 [1982].) "[F]easibility under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, social and technological factors." (*Id.*; see also *Sequoyah Hills Homeowners Ass'n v. City of Oakland*, 23 Cal.App.4th 704, 715, 29 Cal.Rptr.2d 182 [1993].)

The CEQA Guidelines do not define the difference between "avoiding" a significant environmental effect and merely "substantially lessening" such an effect. The City must therefore glean the meaning of these terms from the other contexts in which the terms are used. Section 21081 of CEQA, on which CEQA Guidelines Section 15091 is based, uses the term "mitigate" rather than "substantially lessen." The CEQA Guidelines therefore equate "mitigating" with "substantially lessening." Such an understanding of the statutory term is consistent with the policies underlying CEQA, which include the policy that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." (Public Resource Code Section 21002)

For purposes of these Findings, the term "avoid" refers to the effectiveness of one or more mitigation measures to reduce an otherwise significant effect to a less than significant level. In contrast, the term "substantially lessen" refers to the effectiveness of such measure or measures to substantially reduce the severity of a significant effect, but not to reduce that effect to a less than significant level. These interpretations appear to be mandated by the holding in *Laurel Hills Homeowners Ass'n v. City Council*, 83 Cal.App.3d 515, 519-527, 147 Cal.Rptr. 842 (1978), in which the Court of Appeals held that an agency had satisfied its obligation to substantially lessen or avoid significant effects by adopting numerous mitigation measures, not all of which rendered the significant impacts in question (e.g., the "loss of biological resources") less than significant.

Although CEQA Guidelines Section 15091 requires only that approving agencies specify that a particular significant effect is "avoid[ed] or substantially lessen[ed]," these Findings, for purposes of clarity, in each case will specify whether the effect in question has been reduced to a less than significant level, or has simply been substantially lessened but remains significant.

Moreover, although CEQA Guidelines Section 15091, read literally, does not require findings to address environmental effects that an EIR identifies as merely "potentially significant," these Findings will nevertheless fully account for all such effects identified in the Final Program EIR.

In short, CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modification or alternatives are not required, however, where such changes are infeasible or where the responsibility for modifying the project lies with some other agency. (California Code Regulations Title 14 Section 15091[a], [b])

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its

"unavoidable adverse environmental effects." (California Code Regulations Title 14 Sections 15093, 15043[b]; see also Public Resources Code Section 21081[b]) The California Supreme Court has stated that, "[t]he wisdom of approving...any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (Goleta II, 52 Cal.3d 553, 576)

## **VI. LEGAL EFFECTS OF FINDINGS**

To the extent that these Findings conclude that various proposed mitigation measures outlined in the Final Program EIR are feasible and have not been modified, superseded, or withdrawn, the City hereby binds itself to implement these measures. These Findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when City decision makers formally approve the Project.

The mitigation measures are referenced in the Mitigation Monitoring and Reporting Program (MMRP) adopted concurrently with these Findings, and will be effectuated through the process of implementing the Project.

## **VII. MITIGATION MONITORING AND REPORTING PROGRAM**

CEQA requires the lead agency approving a project to adopt a MMRP for the changes to the project which it has adopted or made a condition of project approval in order to ensure compliance with project implementation. A MMRP has been defined and serves that function for this Final Program EIR.

The MMRP designates responsibility and anticipated timing for the implementation of mitigation. The City will serve as the overall MMRP Coordinator.

A MMRP has been prepared for the Project and has been adopted concurrently with these Findings. (See Pub. Res. Code Section 21081.6[a][1].) The City will use the MMRP to track compliance with Project mitigation measures. The MMRP will remain available for public review during the compliance period.

## **VIII. IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT**

The following summary briefly describes impacts determined to be less than significant, either directly or cumulatively, in the preparation of the Initial Study, Draft Program EIR, and the Final Program EIR. The Council hereby makes this same determination based on the conclusions in the Final Program EIR.

### **Aesthetics – Scenic Vistas, Visual Character**

- The updated Land Use and Mobility Elements and Central District Specific Plan include policies and regulations that encourage protection of scenic vistas and scenic resources, and that promote visually compatible development. The City has adopted City-wide Design Principles to encourage high-quality and visually harmonious and attractive development. Design guidelines are specified for each specific plan area. These policies and regulations will work to mitigate potential impacts of individual future developments to a less than significant level (Final EIR, p.136).
- The Zoning Code Revisions, as the implementing tool of the 2004 Land Use Element, sets guidelines on the kinds of building materials that can be used, window styles, setbacks, lot size, height limits, and maximum density allowances permitted in some sections of Pasadena, such as Bungalow Heaven and Garfield Heights. These guidelines ensure that new development conforms to the existing character of the area. Implementation of the above goals and policies, primarily through application of the Zoning Code Revisions and the design review process, will work to preserve the visual character and quality of Pasadena's districts. Impact will be less than significant (Final EIR, p. 139).

### **Agricultural Resources**

- Pasadena is fully urbanized; there is no agricultural land or use in the City. No land is zoned or designated for agricultural uses. Therefore, no impact will result (Initial Study, pp. 17-18).

### **Air Quality - CO, NO<sub>x</sub>, and ROG Emissions, Compliance with Regional Plans, and Odors**

- The Updated Land Use and Mobility Elements and Central District Specific Plan promote transit and pedestrian-oriented development that reduces vehicular travel and thus, exhaust emissions. The updated Mobility Element improves circulation and traffic flow to reduce congestion and emissions from stop-and-go traffic. The updated Zoning Code defines development standards that include environmental performance standards to reduce consumption of electricity and natural gas, which thereby can reduce emissions from power plants. All these and other features of the project are consistent with air quality plans, policies, and programs for the South Coast Air Basin, as set forth in the South Coast Air Quality Management District's (SCAQMD) *Air Quality Management Plan* (Initial Study, p. 15).
- Development pursuant to the updated Land Use and Mobility Elements will result in new uses similar to current uses in the City, uses which do not generate substantial odors. Any use that may create odors, including a restaurant, will be required to comply with existing SCAQMD and local City regulations regarding odor control. Compliance with the existing regulations will ensure a less than significant impact (Initial Study, p. 15).
- Projected future emissions of three criteria pollutants — CO, NO<sub>x</sub>, and ROG — will not exceed SCAQMD thresholds; impact will be less than significant (Final EIR, p. 122).
- SCAQMD thresholds for CO will not be exceeded due to adoption and implementation of the 2004 Land Use Element and Zoning Code Revisions; therefore, impact will be less than significant (Final EIR, p. 130).

- The 2004 Mobility Element guides the continuing development of a multi-modal circulation system that supports planned growth as directed in the 2004 Land Use Element. The 2004 Mobility Element contains several policies to reduce automotive dependency and does not contain policies that could potentially affect CO pollutant emissions or the location of sensitive receptors. As no CO hotspots will be created from development pursuant to the 2004 Land Use Element, no impact will result (Final EIR, p. 130).

### **Biological Resources**

- Pasadena is highly urbanized and has only few areas with sensitive biological resources remaining. The updated Land Use Element affirms the City's goals, policies, and programs to preserve sensitive areas identified in plans for the Arroyo Seco and Eaton Wash (including Eaton Canyon). No conflict with adopted conservation plans will result. No change to City policies and regulations protecting trees is proposed. The updated Land Use Element incorporates programs and policies to protect biological resources and does not reduce the amount of land designated as open space nor changes any policy with respect to other areas where sensitive resources may be located. Thus, no additional development will occur at those locations, and no significant impact on biological resources will result (Initial Study, p.17).

### **Cultural Resources**

- In November of 2002, the City adopted an updated Historic Preservation Ordinance<sup>1</sup> which established a process for reviewing each development as it may affect a historic resource, mitigating any identified impact, and providing incentives to preserve and reuse a resource. Adopted City policies, programs, standards, guidelines, and regulations provide for a full and comprehensive array of mitigation measures that will apply to development within Pasadena. Continued implementation of existing regulations will provide a means to protect historic resources on a project-by-project basis. Impact will be less than significant (Final EIR, p. 146).
- The District-wide Design Guidelines within the Central District Specific Plan are intended to provide a sense of historical and physical continuity and to reinforce the unique qualities of the Central District through the preservation of historic and cultural resources. The City is also completing an updated historic resources inventory of the Central District, using forms and methods of evaluation recommended by the State of California Office of Historic Preservation. In addition, the City will work with developers through the Preliminary Review Process and with business district associates to assist business and property owners in preparing appropriate designs for rehabilitation projects. Furthermore, as with all projects in Pasadena, development pursuant to the Central District Specific Plan will be subject to the City's Historic Preservation Ordinance and other adopted City policies, programs, standards, guidelines, and regulations. Impact will be less than significant (Final EIR, p. 146).
- The City requires any development within the two sensitive geologic formations (Topanga Formation and Late Miocene Marine Monterey Formation) which involves excavation of five feet or more in depth to complete a pre-excavation field assessment and literature search for paleontological resources. If warranted, and following a field assessment, a program must be developed and implemented for excavation monitoring, resource salvation, and

<sup>1</sup> City of Pasadena. Municipal Code Section 2.75 Historic Preservation Ordinance. Adopted 2002.



curation. A final report must be prepared, and fossils are to be archived in a museum depository. Compliance with existing regulations that protect archaeological and paleontological resources will ensure a less than significant impact (Final EIR, p. 148).

## **Geology and Soils**

- Active and potentially active traces of the Raymond Hill fault zone traverse the southern part of Pasadena. An Alquist-Priolo Earthquake Fault Zone has been delineated for this fault. Other faults that traverse the City are the Sierra Madre Fault, San Gabriel Fault, Eagle Rock Fault, and two unnamed faults. Pasadena is also affected by the regional San Andreas Fault located about 28 miles to the northeast and Newport -Inglewood fault, approximately 18 miles southwest of the City, among others. Areas subject to landslides and liquefaction have been identified around Eaton Canyon and the Arroyo Seco. These issues, together with policies identified to minimize potential seismic and other geotechnical hazards, and implementation programs are fully addressed in the adopted Safety Element. Implementation of the identified programs and policies will ensure a less than significant impact (Initial Study, p. 12).
- The City requires geological and geotechnical investigations in areas of potential seismic or geologic hazards as part of the environmental and development review process. Proposals and projects for development or redevelopment which do not provide for mitigation of seismic or geologic hazards to the satisfaction of responsible agencies will not be approved. The City will continue to require preliminary geological investigations by State-registered geotechnical engineers and certified engineering geologists (in accordance with the Uniform Building Code). All projects and structures will be constructed in compliance with existing seismic safety regulations of the California Uniform Building Code, which requires the use of site-specific engineering and construction standards identified for each class of seismic hazard (Final EIR, pp. 153-154).
- The City currently has in place guidelines and standards for development in hillside areas to minimize the adverse impacts of grading. Also, Section 14.05.084 of the Pasadena Municipal Code requires the control of runoff from all construction sites to guard against erosion. Continued implementation of standard erosion control and engineering techniques during construction of individual projects will reduce erosion impact to a less than significant level (Final EIR, p. 155.)

## **Hazards and Hazardous Materials**

- Any development pursuant to the updated General Plan Land Use Element or the Specific Plan that involves contaminated property will include cleanup and/or remediation of the property in accordance with federal, state, and local requirements and regulations. No construction will occur at such locations until a "no further action" or a similar determination is issued by the City's Fire Department, the Department of Toxic Substance Control, Regional Water Quality Board, and/or other responsible agency. Thus, compliance with existing regulations will ensure that potential hazards will be reduced to a less than significant level (Initial Study, p. 19).
- No private airstrip is located within the vicinity of the project. Therefore, the project will not result in a safety hazard for people residing or working in the project area related to the operation of private airstrips (Initial Study, p. 19).

- The General Plan Safety Element (updated as a separate action in 2002) provides for emergency response and evacuation routes, and plans in tandem with the updated Land Use Element to ensure that no interference from future development will occur. These routes are the Fire Marshall's responsibility, who maintains the City's Disaster Plan. No impact with regard to emergency plans will result (Initial Study, p. 19).
- Wildfire hazards in Pasadena are limited to the areas along the City's western and northeastern boundary, closest to the hilly, wooded areas of the San Rafael Hills and San Gabriel Mountains. The Safety Element identifies potential impacts and the policies and programs to mitigate these impacts. Implementation of the identified policies and programs will ensure a less than significant impact (Initial Study, p. 19).
- Through implementation of 2004 Land Use Element policies, the City will continue to reduce the potential for dangerous fires by concentrating development in previously developed areas within the valley where risk of wildland fire is low; by protecting hillside areas from further urban-wildland interface; by encouraging residents to plant and maintain drought-resistant, fire-retardant landscape species on slopes to reduce the risk of brush fire and soil erosion; and by working with the Fire Department to control hazardous vegetation (Final EIR, p. 163).
- The City will work closely with local water providers to ensure that water pressure is adequate for fire-fighting purposes. Development proposals within high-fire hazard areas will be required to implement fire management plans. The City will continue to enforce its Weed Abatement Program in high-fire risk areas to minimize hazardous vegetation. The City will also enforce its Class A (or better) Roofing Ordinance for residential and commercial development to provide fire-resistive construction, including fire-resistant eaves and awnings. Continued implementation of these measures will ensure a less than significant impact (Final EIR, p. 163).

### **Hydrology and Water Quality**

- The project does not involve discharge into surface or ground waters. No alterations to streams or rivers will occur as a result of the implementation of the updated Land Use or Mobility Element, Central District Specific Plan, or the Zoning Code. The City is largely built out, and no major new development that could substantially alter natural drainage courses would occur. Each individual development project will comply with the existing State Water Quality Control Board and City stormwater regulations, including compliance with National Pollutant Discharge Elimination System (NPDES) requirements related to construction and operation measures to prevent erosion, siltation, and transport of urban pollutants. Compliance with these existing regulations will ensure a less than significant impact (Initial Study, p. 14).
- No area in Pasadena lies within a 100-year flood hazard area, as mapped by the Federal Emergency Management Agency, and no impact related to such flood hazards will occur. Portions of Pasadena lie within inundation areas from Devil's Gate Dam, Eaton Wash Dam, and the Morris S. Jones Reservoir. The Safety Element provides policies and programs to reduce the potential hazard associated with these facilities. Implementation of the adopted policies and programs will ensure a less than significant impact (Initial Study, p. 14).

- Pasadena is located inland and thus is not subject to tsunamis. No major inland water bodies exist to present seiche hazards. Mudflows historically have been a remote hazard within Pasadena. Therefore, impact is less than significant (Initial Study, p. 14).
- Pasadena's projected future water demand will not exceed supply; the impact of the 2004 Land Use Element and Zoning Code Revisions on water resources and groundwater supply will be less than significant. Mitigation measures, although not required, have been applied to the Project to reinforce the importance of maintaining adequate groundwater supply (Final EIR, p. 166).
  1. The City will continue current conservation efforts and actively pursue water storage and source alternatives, including the following programs:
    - Raymond Basin Conjunctive Use Program allows MWD to build a pipeline and additional pumps and wells for the storage of up to 75,000 acre feet of imported water in the basin with a dry year yield of up to 25,000 acre feet per year to meet regional needs
    - Dry year water transfer options
    - Use and production of reclaimed water, as outlined in its *2000 Urban Water Management Plan*
  2. The City will require all development projects to maintain a percentage of the project site as an impervious surface for the purposes of groundwater percolation developments (Final EIR, p. 168).
- The Central District Specific Plan provides guidelines for focused growth and development within the Central District. Population within the Central District is expected to increase by approximately 7,095 persons in 2015, resulting in an increase in water consumption by 1,351 acre-feet/year. This represents 4.5% of the City's total projected future demand, and is well within the future supply estimated in the *Pasadena 2000 Urban Water Management Plan*. Impact on groundwater supply due to development pursuant to the Central District Specific Plan will therefore be less than significant (Final EIR, p. 173).
- Compliance with federal and State regulations and the SUSMP requirements will ensure that development pursuant to the 2004 Land Use Element and Zoning Code Revisions will not violate any water quality standards or waste discharge requirements. Impact will be less than significant (Final EIR, p. 173).
- All new development pursuant to the Central District Specific Plan will comply with existing federal, State, and local water quality requirements, including NPDES requirements as enforced by the City's Stormwater Management and Discharge Control Ordinance. Impact will be less than significant (Final EIR, p. 173).

### **Land Use and Planning**

- Pasadena is a fully developed city with well established land use patterns. The updated Land Use Element does not propose major changes to these land use patterns. The Mobility Element does not provide for any new roadway or other physical feature that would divide the community. There are no habitat conservation plans or natural community conservation plans in or adjacent to the City. The updated Land Use Element continues the preservation policies and programs for the City's sensitive areas; no new policy or program that could

conflict with a habitat or natural community conservation plan is proposed. Impacts are therefore less than significant (Initial Study, p. 11).

- The updated Land Use Element and the Zoning Code Revisions made to parallel the element do not violate any existing plan or regulation. In fact, they continue the 1994 General Plan land use planning objectives and policies, including those that support regional planning efforts to integrate jobs and housing and provide for transit-oriented development, among others (Initial Study, p. 11).
- City land use policies promote land use compatibility and reduce potential conflicts between existing and future uses. The 2004 Land Use Element intensity/density standards, as implemented through the specific plans and Zoning Code Revisions, continue existing land use practices. No significant adverse land use impacts will result from adoption and long-term implementation of the 2004 Land Use Element and the Zoning Code Revisions (Final EIR, p. 56).
- The Central District Specific Plan promotes land use compatibility and prevents land use conflicts by continuing to focus new commercial development in areas already supporting nonresidential uses that are not utilized to their full density. Minimal land use conflict will result from mixed-use retail and commercial development because the uses are integrated within existing sites and/or buildings. Impact will be less than significant (Final EIR, p. 60).
- The 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan are consistent with the overarching goals set forth in SCAG's Regional Comprehensive Plan and Guide. No significant impact will result (Final EIR, p. 62).

#### **Mineral Resources**

- Eaton Wash and Devil's Gate Reservoir are the two areas within the City mapped as mineral resource areas. In the past, sand and gravel was extracted from Eaton Wash, and cement concrete aggregate was extracted from Devil's Gate Reservoir. Neither of these two areas has been used for commercial mineral extraction for at least 20 years. Both areas are designated and zoned Open Space, except for a small area in Eaton Wash that is developed as a high-tech business park. The updated Land Use Element and Zoning Code Revisions do not change either this land use designation or the policies and programs protecting these areas. Therefore, no impact on these resources will result (Initial Study, p. 18).

#### **Noise – Airports and Mobility Element**

- Because no public airport or private airstrip is located within the vicinity of the City, the Project will not expose people residing or working in the project area to excessive noise levels (Initial Study, p. 20).
- Implementation of the 2004 Mobility Element Implementation Actions will reduce traffic-related noise impacts on the City, especially in residential areas. The 2004 Mobility Element will not create a significant impact associated with noise (Final EIR, p. 110).
- Compliance with existing City standards and implementation of Noise Element measures, including compliance with the City Noise Ordinance (Municipal Code Chapter 9.36), will reduce impact to a less than significant level noise (Final EIR, p. 112).

## **Population and Housing**

- The 2004 Land Use Element and Zoning Code Revisions preserve established land use patterns. No policy or program in the Land Use Element or the Central District Specific Plan would result in displacement of substantial numbers of either existing housing or people. Impact will be less than significant (Initial Study, p. 12).
- The 2004 Land Use Element is supportive of regional growth management goals and objectives in that the Element will not induce substantial population growth over the next 11 years relative to subregional and regional population projections. Impact is less than significant (Final EIR, p. 92).
- Implementation of the Central District Specific Plan will not induce population growth. Projected population growth will not conflict with the targeted growth policies of the 2004 Land Use Element or SCAG's regional growth policies. Impact will be less than significant (Final EIR, p. 94).
- Development pursuant to the 2004 Land Use Element policy, as implemented primarily through the Zoning Code Revisions, will generate employment opportunities and work to achieve a jobs/housing balance consistent with regional plans. Impact will be less than significant (Final EIR, p. 96).
- The 23% increase in employment opportunities projected to occur within the Central District Specific Plan area will not conflict with local and regional plans because such targeted growth is in accordance with the City's 2004 Land Use Element. Impact will be less than significant (Final EIR, p. 97).

## **Public Services**

- Consistent with current practice, all individual development projects will be reviewed by the Police Department to identify and remedy potential risks to public safety. Furthermore, all development projects will be subject to standard predevelopment plan review by several City departments to ensure compliance with City, State, and federal laws. In addition to the Fire Department, the Building Division will review proposed project plans for safety measures and collects a development fee that is based on the square footage and type of construction valuation. Impact will be less than significant (Final EIR, p. 176).
- Implementation of the Mobility Element will not burden the City's emergency response capabilities, and will not result in significant impact on emergency resources. Impact will be less than significant (Final EIR, p. 177).
- The environmental effects of construction and operation of additional school facilities will be evaluated by the Pasadena Unified School District when planning for construction of new schools or expansion of existing facilities. New development projects will contribute school fees consistent with the District's fee schedule. The City will continue compliance with the following programs to offset development impacts to schools:
  - Senate Bill 50, which addresses how schools are financed and how development projects may be assessed for associated school impacts and levies development fees to support school construction necessitated by that development (Final EIR, P. 186).

- Measure Y School Bond to modernize the 30 schools in the Pasadena Unified School District (Final EIR, P. 182).

Impact will be less than significant (Final EIR, p. 183).

- Although the 2004 Land Use Element will provide for an increase in the City's population over the next 11 years, library services will be sustained by existing City policies and the Element's commitment to maintaining adequate services including educational and library facilities, funded by the City's Library Special Tax. Existing facilities will be modernized and improved over time, but the need for the construction of new branches is unlikely. Impact will be less than significant (Final EIR, p. 184).
- Pasadena's main library, the Central Library, is located within the Central District Specific Plan area at 285 East Walnut Street. The City has adopted the Library Special Tax, which levies a tax on each residential unit and nonresidential parcel within the City for the purposes of maintaining and improving the City's Library system. This measure will ensure that existing facilities are modernized and improved over time. The need for the construction of new library branches is unlikely. Impact will be less than significant (Final EIR, p. 184).

#### **Transportation/Traffic – Air Traffic, Emergency Access, and Parking**

- Future development guided by the updated Land Use and Mobility Elements and the Central District Specific Plan does include any feature that could affect air traffic or safety. No adverse impact will result (Initial Study, p. 16).
- All new development pursuant to the updated Land Use Element and Central District Specific Plan will be planned in accordance with City regulations, including the provision of adequate emergency access, safe vehicular access, and required parking. The Zoning Code revision includes a comprehensive revision of parking regulations to ensure consistent provision of adequate parking by future individual development projects. The Central District Specific Plan addresses parking for Downtown needs. The updated Mobility Element provides policies for roadway improvements to improve traffic and pedestrian safety. Impact will be less than significant (Initial Study, p. 16).

#### **Utilities/Service Systems**

- Development pursuant to the 2004 Land Use Element will not burden either the City's or MWD's water resources or facilities such that either the City or MWD will need to construct new facilities that may cause environmental impact. Projected future water demand will not exceed supply, and the impact of the 2004 Land Use Element and Zoning Code Revisions on water resources and infrastructure will be less than significant (Final EIR, p. 194).
- All development pursuant to the Central District Specific Plan will comply with existing water utility connection fees, as described above, and be subject to the 2004 Land Use Element's measures to reduce the burden on infrastructure due to new development. Impact on water supply and utilities as a result of adoption and implementation of the Central District Specific Plan will be less than significant (Final EIR, p. 194).
- The Project will not significantly impact the ability of the Sanitation Districts of Los Angeles

County to treat sewage. All projects developed pursuant to adoption and implementation of the 2004 Land Use Element will be charged a sanitation connection fee to connect to the regional sewer system. The connection fee is based upon the cost of incremental expansion of the regional sewer system to accommodate growth. Given the Districts' financing policies and periodic maintenance plan, development pursuant to the 2004 Land Use Element and Zoning Code Revisions will not require any improvements to the regional sewer infrastructure system. Impact on regional facilities will be less than significant (Final EIR, p. 197).

- Wastewater impacts resulting from development within the Central District Plan area will be addressed on an as-needed basis. Developers will be required to repair and/or augment any local wastewater facilities that may be impacted by the operation of individual development projects at the time of their construction. Therefore, development pursuant to adoption and implementation of the Central District Specific Plan will result in a less than significant impact on wastewater facilities (Final EIR, pp. 197-198).
- The 2004 Land Use Element is consistent with adopted Safety Element flood prevention policies, and development will be subject to the City's impact fees to improve storm drains, the implementation of which will ensure a less than significant impact on stormwater drainage systems (Final EIR, p. 199).
- The Central District Specific Plan identifies land use intensities and provides for an increase in both residential and nonresidential development within the Central District. The Central District is highly urbanized, and new development pursuant to adoption and implementation of the Specific Plan will be compact, consisting primarily of infill projects. Thus, a limited increase in the amount of impervious surface area will result, and the amount and speed of stormwater runoff is not expected to exceed the capacity of the existing stormwater drainage system. Impact will be less than significant (Final EIR, P. 200).
- Implementation of the 2004 Land Use Element and Zoning Code Revisions will not generate solid waste that will result in a need for new or substantially altered solid waste facilities. Continued compliance with existing regulations and City policies will ensure a less than significant impact (Final EIR, p.198). Nevertheless, the following mitigation measures have been applied to the Project to further City efforts to reduce solid waste generation.
  1. The City will introduce a program to require multifamily housing developments to provide onsite recyclable materials collection facilities.
  2. The City will initiate a public information campaign that encourages commercial establishments, such as restaurants, to use recycled products (i.e., napkins, paper, etc.).
  3. The City will prioritize the selection of authorized waste haulers by those that provide recycling services.

## IX. DIRECT SIGNIFICANT EFFECTS, MITIGATION MEASURES, AND FINDINGS OF FACT

The following Findings for Project Impacts refer to the significant environmental effects of the project. Mitigation measures have been identified in the Final Program EIR which will avoid or substantially lessen the significant environmental effects to below a level of significance.

### A. AESTHETICS

**Significant Project Impact (Light and Glare):** Pasadena is highly urbanized, and land use policies concentrate development in previously developed areas of the City. Thus, light levels within Pasadena will not substantially increase with implementation of the 2004 Land Use Element, the Zoning Code Revisions, and the Central District Specific Plan. However, new structures could create glare effects if they incorporate reflective building materials into project design. Therefore, depending on the location and scope of development, impact could be significant at a localized level.

**Finding:** Pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required of or incorporated into the Project which avoid the significant environmental effects identified in the Final Program EIR.

**Facts in Support of Finding:** The potential light and glare impacts can be avoided by implementation of the following mitigation measures. The following mitigation measures are feasible, will be required as conditions of approval on development projects, and will be made binding upon any development entitlement through these Findings:

1. For development proposals subject to environmental review and/or design review, the City will examine potential light and glare effects associated with structures and on-site activities, and will ensure that features are incorporated into projects to avoid any adverse light and glare impacts (Final EIR, p. 140).
2. The Zoning Code Revisions will limit the use of reflective and glare-producing building materials (Final EIR, p. 140).
3. The Zoning Code Revisions will require that all nighttime lighting be focused down onto the site and not onto adjacent properties (Final EIR, p. 141).
4. The City will establish a program to encourage the use of low-wattage bulbs in nighttime lighting by offering an incentive that discounts the cost of energy-conserving nighttime lighting (Final EIR, p. 141).

### B. AIR QUALITY

**Significant Project Impact (Short-Term Air Quality):** The Land Use Element and Central District Specific Plan will allow for new development to occur; such new development will involve construction activity over the course of the planning period established in the documents. Construction-related emissions will have to be evaluated on a project-specific basis. Construction will primarily generate airborne dust, CO emissions, PM<sub>10</sub>, and NO<sub>x</sub>. While individual development projects will be required to employ construction methods that minimize



pollutant emissions (e.g., watering for dust control, tuning of equipment, limiting truck traffic to non-peak hours), on a cumulative basis over the next 11 years pollutant emissions associated with construction activity will be significant. As such, the potential short-term air quality impacts from construction are considered significant.

**Finding:** Pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required of or incorporated into the Project which substantially lessen the significant environmental effects identified in the Final Program EIR. These changes, however, will not reduce short-term air quality impacts to a level below significance. Pursuant to CEQA Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), there are no feasible measures that would mitigate these impacts below a level of significance. As described in the Statement of Overriding Considerations, the City Council has determined that these impacts are acceptable because of specific overriding considerations.

**Facts in Support of Finding:** Potential short-term air quality impacts would be substantially lessened by implementation of the following mitigation measures. Nevertheless, these impacts will remain significant and are unavoidable. The following mitigation measures are feasible, will be required as a condition of approval on development projects, and will be made binding upon any development entitlement through these Findings:

1. Dust Control (PM<sub>10</sub>)

- Water all active construction areas at least twice daily.
- Cover all haul trucks or maintain at least two feet of freeboard.
- Pave or apply water four times daily to all unpaved parking or staging areas.
- Sweep or wash any site access points within 30 minutes of any visible dirt deposition on any public roadway.
- Cover or water twice daily any on-site stockpiles of debris, dirt or other dusty material.
- Suspend all operations on any unpaved surface if winds exceed 25 mph.
- Hydroseed or otherwise stabilize any cleared area which is to remain in active for more than 96 hours after clearing is completed.
- Ensure that all cut and fill slopes are permanently protected from erosion.  
(Final EIR, p. 127)

2. Emissions (NO<sub>x</sub>)

- Require the construction contractor to ensure that all construction equipment is maintained in peak working order.
- Limit allowable idling to 10 minutes for trucks and heavy equipment.  
(Final EIR, p. 127)

3. Off-site Impacts

- Encourage car pooling for construction workers.
- Limit lane closures to off-peak travel periods.
- Park construction vehicles off traveled roadways.
- Wet down or cover dirt hauled off-site.
- Wash or sweep away access points daily.
- Encourage receipt of materials during non-peak traffic hours.
- Sandbag construction sites for erosion control.  
(Final EIR, p. 128)

**Significant Project Impact (Long-Term Air Quality):** At full implementation of the Project, projected future emissions of three criteria pollutants — CO, NO<sub>x</sub>, and ROG — will not exceed SCAQMD thresholds; impact will be less than significant. However, projected future emissions of PM<sub>10</sub> will exceed the established threshold of 150 pounds per day. Since Pasadena lies in a non-attainment area and PM<sub>10</sub> impact will be significant, mitigation measures are required to further reduce air pollutant emissions within the South Coast Air Basin.

**Finding:** Pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required of or incorporated into the Project which substantially lessen the significant environmental effects identified in the Final Program EIR. These changes, however, will not reduce long-term air quality impacts to a level below significance. Pursuant to CEQA Section 21081(a)(3), CEQA Guidelines Section 15091(a)(3), there are no feasible measures that would mitigate these impacts below a level of significance. As described in the Statement of Overriding Considerations, the City Council has determined that these impacts are acceptable because of specific overriding considerations.

**Facts in Support of Finding:** Potential long-term air quality impacts would be substantially lessened by implementation of the following mitigation measures. Nevertheless, these impacts will remain significant and are unavoidable. The following mitigation measures are feasible, required as a condition of approval on development projects, and will be made binding upon any development entitlement through these Findings:

4. In accordance with AQMD Rule 403, the City shall require the following measures to be taken during the construction of all projects to reduce the amount of dust and other sources of PM<sub>10</sub>:
  - Dust suppression at construction site using surfactants and other chemical stabilizers
  - Wheel washers for construction equipment
  - The watering down of all construction areas(Final EIR, p. 128)
5. The City will continue to implement effective citywide street sweeping (Final EIR, p. 128).
6. The City will use Best Available Control Technology in its practices, including but not limited to advanced diesel particulate traps on all City vehicles and purchase and use of aqueous diesel fuel vehicles (Final EIR, p. 128).
7. The City will implement transportation systems management techniques that include synchronizing traffic signals and limiting on-street parking (Final EIR, p. 128).
8. The City will encourage major employers, tenants in business parks and other activity centers, and developers of large new developments to participate in transportation management associations (Final EIR, p. 128).
9. The City will work to divert commercial truck traffic to off-peak periods to alleviate non-recurrent congestion as a means to improve roadway efficiency and reduce diesel emissions (Final EIR, p. 128).

At the individual project level, the City will apply the following mitigation measures which will

work toward regional emissions reductions:

10. The City will encourage the incorporation of energy conservation techniques (i.e. installation of energy saving devices, construction of electric vehicle charging stations, use of sunlight-filtering window coatings or double-paned windows, utilization of light-colored roofing materials as opposed to dark-colored roofing materials, and placement of shady trees next to habitable structures) in new developments (Final EIR, p. 128).

## C. NOISE

**Significant Project Impact (Vehicular Noise):** Implementation of the Project will allow new residential development within the City, including in areas where the General Plan Noise Element indicates that future noise levels along major streets and freeways will be at or exceed 70 db(A) CNEL. This represents the limit at which residential and other sensitive land uses are deemed "conditionally acceptable." The degree to which future individual development projects will be able to achieve noise reduction within areas having noise levels in excess of 70 dB(A) cannot be assessed. New residential development could, under some conditions, be located in areas where noise/land use conflicts cannot be fully mitigated; the degree to which mitigation could achieve reduction is not known. Impact will be significant.

**Finding:** Pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required of or incorporated into the Project which substantially lessen the significant environmental effect identified in the Final Program EIR. These changes, however, will not reduce exterior sounds impacts to a level below significance. Pursuant to CEQA Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), there are no feasible measures that would mitigate these impacts below a level of significance. As described in the Statement of Overriding Considerations, the City Council has determined that these impacts are acceptable because of specific overriding considerations.

**Facts in Support of Finding:** Potential impacts related to consistency with adopted noise standards would be substantially lessened by implementation of the following mitigation measures. The degree to which such mitigation will achieve noise/land use compatibility objectives cannot be measured. Thus, impact is significant and unavoidable on an individual project basis. The following mitigation measures are feasible, will be required as a condition of approval on development projects, and will be made binding upon development entitlements through these Findings:

Because implementation of the 2004 Land Use Element will allow residential and other noise-sensitive uses within "conditionally acceptable" noise exposure zones, the following mitigation is required and will be applied to applicable development projects:

1. The City will require that all new residential development and other noise-sensitive uses proposed in areas experiencing noise levels considered "conditionally acceptable" to incorporate noise-mitigating features identified in acoustical studies prepared for such development projects. Such features may include the following measures set forth in the Noise Element's "Noise Evaluation and Mitigation" section:
  - a) If a 15-20 dB(A) reduction is needed, the following shall be included in development projects as directed by the Building Official:
    - Air conditioning or a mechanical ventilation system

- Windows and sliding glass doors should be double-paned glass and mounted in low air infiltration rate frames (0.5 cfm or less, per American National Standard Institute [ANSI] specifications)
  - Solid core exterior doors with perimeter weather stripping and threshold seals
- b) If a 20-25 dBA reduction is needed, the following shall be included in development projects as directed by the Building Official:
- Same as 1(a) – (c) above
  - Exterior walls consist of stucco or brick veneer. Wood siding with a 1/2" minimum thickness fiberboard underlayer may also be used
  - Glass in both windows and doors should not exceed 20% of the floor area in a room
  - Roof or attic vents facing the noise source should be baffled
- c) If a 25-30 dBA reduction is needed, the following shall be included in development projects as directed by the Building Official:
- Same as 2(a) - (b) above
  - Attach interior sheetrock of exterior wall assemblies to studs by resilient channels; acceptable alternatives include staggered studs or double walls
  - Use window assemblies with laboratory-tested STC rating of 30 or greater (windows that provide superior noise reduction capability and that are laboratory-tested are sometimes called "sound-rated" windows. In general, these windows have thicker glass and/or increased air space between panes. In contrast, standard energy conservation double-pane glazing with a 1/8" or 1/4" air space may be less effective in reducing noise from some noise sources than single pane glazing.)

The requirements may also include orientation of buildings to shield outdoor living space from noise sources, provision of acoustical barriers, and other effective measures (Final EIR, pp. 113 and 114).

#### **D. PUBLIC SERVICES**

**Significant Project Impact (Emergency Services):** The Central District Specific Plan area is currently well served by the location of both Fire and Police stations; however, over time both the Police and Fire Departments may each need additional staff and equipment to meet increased demand due to the expected growth in population over the next 11 years. While the need for the construction of new facilities is unlikely, mitigation measures are required to address increased demand for these services over time and ensure adequate emergency response resources in the future.

**Finding:** Pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required of or incorporated into the Project which avoid the significant environmental effect identified in the Final Program EIR.

**Facts in Support of Finding:** Potential impacts related to police and fire services can be avoided by implementation of the following mitigation measures. The following mitigation measures are feasible, will be required as a condition of approval on development projects, and will be made binding upon development entitlements through these Findings:

1. As part of the annual budgeting process, the City will assess the need for additional sworn and non-sworn police officers and fire personnel to provide protection services consistent

with established City service levels and commensurate with the increase in population (Final EIR, p. 179).

2. All new development will be evaluated on a project-specific basis to determine whether any unusual need exists for specialized law enforcement and/or fire protection services. Such needs will be funded by developers of such projects (Final EIR, p. 179).
3. Ingress, egress, and roadways constructed or improved pursuant to the 2004 Mobility Element shall be designed in compliance with Pasadena Fire Department access requirements (Final EIR, p. 179).

## **E. RECREATION**

**Significant Project Impact (Parkland):** Implementation of the 2004 Land Use Element will result in new development and population growth. Population is expected to reach 158,213 persons in 2015. Pasadena will thus further exceed the National Recreation and Parks Service standard of 3 acres of local parkland per 1,000 residents, which is used in the EIR analysis in the absence of a formally adopted City standard. According to this standard, the increase in population expected as a result of the 2004 Land Use Element will cause the City to experience a parkland deficit of approximately 159.85 acres by the year 2015.

Both the 2004 Land Use Element and Central District Specific Plan identify several strategies to improve recreational facilities and access to them throughout the City. Implementation of these strategies and payment of the Residential Impact Fee, in combination with the implementation of the Public Open Space Concept and policy initiatives identified in the Central District Specific Plan, will reduce the burden on existing facilities. However, there will remain a parkland deficit in the Central District area, as throughout the City, and impact will be significant.

**Finding:** Pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required of or incorporated into the Project which substantially lessen the significant environmental effect identified in the Final Program EIR. These changes, however, will not reduce impacts on parks and recreation to a level below significance. Pursuant to CEQA Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), there are no feasible measures that would mitigate these impacts below a level of significance. As described in the Statement of Overriding Considerations, the City Council has determined that these impacts are acceptable because of specific overriding considerations.

**Facts in Support of Finding:** The City will continue to provide and expand its community recreation activities and facilities as needed to support the community as it grows, and the Central District Specific Plan proposes several measures to provide recreational opportunities for its residents. However, land available for parks acquisition is at a minimum, and the City will continue to have a parkland deficit in the future; this impact will be significant and unavoidable. Potential impacts related to parkland and recreational activities and facilities will be reduced by implementation of the following mitigation measures. The following mitigation measures are feasible, will be required as a condition of approval on development projects, and will be made binding upon development entitlements through these Findings:

1. The City will complete a pocket parks acquisition and development study, as discussed in the Central District Specific Plan, for the entire City. This study will determine what options are available to the City to improve park access to its residents, including working with private developers and property owners to provide publicly accessible open spaces as part

of new development projects, identifying funding sources, and actively pursuing shared-use facilities with schools (Final EIR, p. 190).

2. The City Council will continue to evaluate Pasadena's parks and recreation needs and adjust the Residential Impact Fee as necessary to expand and maintain the City's park system. Part of the evaluation may include establishment of a parklands standard against which the impact of future projects may be assessed schools (Final EIR, p. 190).

#### **F. TRANSPORTATION/TRAFFIC - ROADWAY SYSTEM**

**Significant Project Impact (Street Segments):** Although the goals and policies in the 2004 Land Use and Mobility Elements encourage transit-oriented development and stress non-automotive modes of travel, increased population resulting from development in Pasadena, combined with regional growth and its associated contribution to increased traffic volumes on the local road network, will result in an increase in vehicle trips citywide. The combined length of lane-miles in LOS E and F will increase to 49.8 lane miles (8.9% of total street segments studied) in horizon year 2015 (as shown in Table 17 of the Final EIR, Future Year 2015 Base) from 16.9 lane miles (3.1% of total studied street segments) in year 2000.

Within the Central District, local growth, together with regional growth, will increase the number of impacted lane-miles to 5.0 miles, or 5.5% of the lane-miles studied. This represents an increase of 2.7% over *Baseline Year 2000*, or a total of 2.4 lane miles. In the *Future Year 2015 with Project* condition, the percentage of LOS E and F lane-miles intersections relative to the *Future Year 2015 Base* condition will be reduced due to implementation of 2004 Mobility Element policies and programs. However, for purposes of CEQA analysis, the impact assessment must compare the *Future Year 2015 with Project* condition to *Baseline Year 2000*. Impact will be significant.

As described on page 79 of the Final EIR, regional growth will contribute to this impact. The traffic analysis assessed the impact of future traffic volumes (regional traffic from sources outside of Pasadena and with locally generated traffic) associated with horizon year 2015 development anticipated in the 2004 Land Use Element and Central District Specific Plan. Due to regional growth, the combined length of lane-miles at LOS E and F will increase from 16.9 lane-miles (3.1% of total studied lane miles) in baseline year 2000 to 47.8 lane-miles (8.6% of lane-miles studied) in horizon year 2015. This translates to an additional 30.9 lane-miles operating at LOS E and F in 2015 without the project.

To assess the impact of the project on the future street system, future traffic volumes associated with growth in Pasadena pursuant to the 2004 Land Use Element and implementing documents, notably the Central District Specific Plan, were added to the *Future Year 2015 Base* volumes. Per CEQA requirements, this cumulative condition (regional plus local growth) must be considered and compared to the *Baseline Year 2000* conditions to assess the level of traffic impacts due to the project on street segments. The combined length of lane-miles in LOS E and F will grow to 49.8 lane miles (8.9% of total street segments studied) in horizon year 2015 (as shown in Table 17, Future Year 2015 Base) from 16.9 lane miles (3.1% of total studied street segments in year 2000). The conclusion can be drawn that much of the impact results from regional traffic growth (Final EIR, pp. 80-81).

In addition, most of the impacted lane-miles are located on major arterials and not on collectors. This is attributed to the City's efforts to protect residential neighborhoods from through traffic by forcing through traffic onto multimodal corridors (or major arterials).

**Finding:** Pursuant to CEQA Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), there are no feasible measures that would mitigate these impacts below a level of significance. In some communities, major street widening projects represent one solution to providing increased roadway capacity and reducing future impacts. However, such actions are inconsistent with Pasadena's policy to minimize street widening projects and instead address congestion through innovative land use and transportation solutions. Also, the City has included focused intersection improvement projects in the Mobility Element that will improve intersection operations and levels of service (see discussion below) and thereby enhance the overall function of the circulation system in the long term. As described in the Statement of Overriding Considerations, the City Council has determined that these impacts are acceptable because of specific overriding considerations.

**Facts in Support of Finding:** The 2004 Mobility Element includes several action items and implementation strategies that will help to manage automobile, transit, and truck traffic flow on the City's street system, and measures that will protect neighborhoods from intrusion of cut-through traffic. The strategies are listed here, not as mitigation measures as defined by CEQA, but as actions the City is currently pursuing.

- Support of transit-oriented development.
- Targeting growth in the Central District and around light rail stations.
- Parking management to support short-term customer parking and discourage all-day employee parking.
- Shared parking and pooled parking to more effectively utilize the overall parking supply.
- Increased use of Intelligent Transportation System technology along key corridors to increase the efficiency of the system, including the expansion of the City's Traffic Management Center.
- Continued implementation and enforcement of the Trip Reduction Ordinance.
- Support for the Pasadena Transportation Management Association.
- Support for the extension of the Gold Line to Claremont.
- Increased transit service within the City including expansion of the local ARTS bus system and the implementation of Rapid Bus along Fair Oaks Avenue and along Colorado Boulevard.
- Expansion of the bicycle and pedestrian systems and facilities in the City and adoption of review policies to strengthen the role of non-auto transportation planning in the development of new projects.
- Application of the Guidelines for Transportation Review of Projects.
- Distribution of the City's Neighborhood Traffic Management Program Handbook to assist neighborhoods that experience problems with cut through, speeding traffic, and parking intrusion.

These programs and others are detailed in the 2004 Mobility Element. While difficult to quantify in terms of the specific number of vehicle trips removed from the street system, the programs and actions will have the effect of encouraging alternate modes of travel in the City, promoting regional solutions to area-wide transportation challenges, reducing automobile travel demand, and protecting residential neighborhoods from traffic impacts (Final EIR, p. 84).

**De-emphasized Streets:** The policy of limiting growth of future traffic volumes on certain streets was established as part of the 1994 General Plan in order to achieve a balance between the needs of commercial and residential areas. The 2004 Mobility Element continues to recognize these streets. As shown in Figure 3 in Section 2.0 – Project Description of the Final

EIR, no capacity-enhancing improvement will be made along the following de-emphasized streets.

**North-South:**

- Marengo Avenue between Del Mar Boulevard and the south City limit
- Los Robles Avenue between Del Mar Boulevard and the south City limit
- All of El Molino Avenue within the City
- Orange Grove Boulevard between Columbia Street and Colorado Boulevard
- Hill Avenue between the I-210 Freeway and the north City limit

**East-West:**

- All of Washington Boulevard within the City
- California Boulevard between Orange Grove Boulevard and St. John Avenue
- California Boulevard between Lake Avenue and east City limit

**Multimodal Corridors:** Multimodal corridors are the City's major thoroughfares for movement within, to, and from Pasadena. These corridors create an environment where different modes of transportation are encouraged. Wherever appropriate, amenities for non-automobile users are provided along these corridors. Vehicular traffic will be directed to multimodal corridors and away from de-emphasized streets and residential neighborhoods. As shown in Figure 4 of Section 2.0 – Project Description of the Final EIR, City-designated multimodal corridors include the following:

**North-South:**

- All of Lincoln Avenue within City limits
- All of Arroyo Parkway within City limits
- All of Fair Oaks Avenue within City limits
- Los Robles Avenue north of Del Mar Boulevard
- Lake Avenue between Woodbury and California Boulevard
- Hill Avenue between I-210 Freeway to Del Mar Boulevard
- Allen Avenue between Orange Grove Boulevard and Del Mar Boulevard
- All of Altadena Drive within City limits
- Sierra Madre Boulevard north of the freeway
- All of San Gabriel Boulevard within City limits
- All of Rosemead Boulevard within City limits

**East-West:**

- Woodbury Road between Los Robles Avenue and Lake Avenue
- Orange Grove Boulevard between SR-134 and Rosemead Boulevard
- All of Maple Street (one-way) within City limits
- All of Corson Street (one-way) within City limits
- Walnut Street between Orange Grove Boulevard and Foothill Boulevard
- All of Foothill Boulevard within City limits
- Union Street (one-way) between Fair Oaks Avenue and Hill Avenue
- All of Colorado Boulevard within City limits
- Green Street (one-way) between Fair Oaks Avenue and Hill Avenue
- Del Mar Boulevard between St. John Street to East City limit
- Glenarm Street between Fair Oaks Avenue and Arroyo Parkway

The 2004 Mobility Element contains the following policies regarding multimodal corridors and de-emphasized streets.



- Policy 1.5      Promote ease of access to local and regional transportation services by developing identifiable corridors to accommodate travel within the City and to/from destinations outside the City.
  
- Policy 1.7      Focus development densities for residential and nonresidential land uses around the six Gold Line Light Rail stations within City boundaries.
  
- Policy 1.8      Continue programs to implement both transportation improvements and automobile demand reduction programs that mitigate the impacts of new development.
  
- Policy 2.2      Develop local feeder-circulator transit services connecting residential neighborhoods and places of activity with Gold Line Light Rail stations.
  
- Policy 2.10     Promote improvements for pedestrians to support vibrant and active streets and major places of activity.
  
- Policy 3.1      Make the most efficient use of major corridors and discourage through-traffic from using local streets to bypass congested intersections. Conduct project review of new development along multimodal corridors to eliminate or minimize the intrusion of through traffic from these projects.
  
- Policy 3.2      Apply traffic management measures to control traffic speeds and volumes on local and collector streets within residential neighborhoods to assure safe and orderly traffic flows.
  
- Policy 3.11     Recognize designated de-emphasized streets as routes where efforts will be made to control increases in through travel. Transportation measures that would increase traffic capacity will not be planned for these corridors.
  
- Policy 4.1      Recognize designated de-emphasized streets as routes where efforts will be made to control increases in through travel. Transportation measures that would increase traffic capacity will not be planned for these corridors (Final EIR, pp. 75-76).

**Significant Project Impact (Intersection Capacity):** Although the goals and policies in the 2004 Land Use and Mobility Elements encourage transit-oriented development and stress non-automotive modes of travel, increased population resulting from development in Pasadena, combined with regional growth and its associated contribution to increased traffic volumes on the local road network, will result in an increase in vehicle trips citywide.

Under the *Future Year 2015 with Project* condition, which includes regional traffic growth, the operation of the key intersections will deteriorate as both local Pasadena traffic and regional background traffic increases. Even with the implementation of the Intelligent Transportation System (ITS) elements called for in the 2004 Mobility Element, 9 of the 18 study intersections are projected to operate at LOS E and F. The City of Pasadena also defines a significant project impact if an intersection will experience a decline in the volume-to-capacity ratio as follows:

### Thresholds of Significance for Increases in LOS

Existing LOS	Increases in LOS Due to Project
A	0.06 or greater
B	0.05 or greater
C	0.04 or greater
D	0.03 or greater
E	0.02 or greater
F	0.01 or greater

Source: City of Pasadena. *Traffic Impact Report Preparation Guidelines*. July 1999.

Using the City's criteria, under the *Future Year 2015 with Project* conditions, 15 of the 18 study intersections will experience a significant impact.

As part of the analysis of Project alternatives, the City examined Alternative 7: Physical Improvements to Improve Traffic Flow. The purpose of analyzing this alternative was to determine what measures could be pursued to reduce the number of intersections operating at LOS E or F in the future. While policies in the Draft Mobility Element discourage roadway widenings to accommodate traffic volumes, Element policies do not address focused intersection improvements. The analysis for Alternative 7 found that focused improvements at certain intersections could improve operating conditions to the degree such that no intersection would experience a future LOS F condition and only one – Arroyo Parkway/California Boulevard – would operate at LOS E (Final EIR, p. 237 and Figure 26, p. 239). Alternative 7 also assumes that construction of the Gold Line through to Claremont. Thus, the City has amended the Mobility Element to support extension of the Gold Line and to include the following intersection improvements:

- **Arroyo Parkway/Del Mar Boulevard:** Add a second left-turn lane to the eastbound approach. This improvement would require additional right-of-way on the eastbound approach.
- **Arroyo Parkway/California Boulevard:** Add a second left turn lane to the westbound approach to accommodate traffic destined for the Pasadena Freeway. Add a northbound right-turn lane to the intersection (requires additional right-of-way)
- **Lake Avenue/Maple Boulevard:** Restripe Maple to provide three through lanes from Lake to Los Robles and widen within the existing right-of-way to provide the additional lane and retain the bike lane.
- **Rosemead Boulevard/Foothill Boulevard:** Add a second left-turn lane on all four approaches (requires additional right-of-way and may not be feasible until buildings in some of the quadrants of the intersection redevelop).
- **Del Mar Boulevard/Hill Boulevard:** Add a second left-turn lane on the eastbound approach to accommodate the traffic that is headed for the I-210 freeway (requires additional right-of-way on the eastbound approach).
- **Sierra Madre Villa/Foothill:** Add a second left-turn lane on the northbound, eastbound, and westbound approach (requires additional right-of-way).

**Finding:** Pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required of or incorporated into the Project which substantially lessen the significant environmental effect identified in the Final Program EIR. These changes, however, will not completely reduce impacts on the intersections to a level below significance. Pursuant to CEQA Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), there are no additional feasible measures that would mitigate these impacts below a level of significance. As described in the Statement of Overriding Considerations, the City Council has determined that these impacts are acceptable because of specific overriding considerations.

**Facts in Support of Finding:** Potential traffic impacts would be substantially lessened by implementation of the following intersection improvements:

- **Arroyo Parkway/Del Mar Boulevard:** Add a second left-turn lane to the eastbound approach. This improvement would require additional right-of-way on the eastbound approach.
- **Arroyo Parkway/California Boulevard:** Add a second left turn lane to the westbound approach to accommodate traffic destined for the Pasadena Freeway. Add a northbound right-turn lane to the intersection (requires additional right-of-way)
- **Lake Avenue/Maple Boulevard:** Restripe Maple to provide three through lanes from Lake to Los Robles and widen within the existing right-of-way to provide the additional lane and retain the bike lane.
- **Rosemead Boulevard/Foothill Boulevard:** Add a second left-turn lane on all four approaches (requires additional right-of-way and may not be feasible until buildings in some of the quadrants of the intersection redevelop).
- **Del Mar Boulevard/Hill Boulevard:** Add a second left-turn lane on the eastbound approach to accommodate the traffic that is headed for the I-210 freeway (requires additional right-of-way on the eastbound approach).
- **Sierra Madre Villa/Foothill:** Add a second left-turn lane on the northbound, eastbound, and westbound approach (requires additional right-of-way).

The City has incorporated these measures into the Mobility Element and has included a policy to support extension of the Gold Line to Claremont.

The analysis on pages 234 through 240 of the Final EIR indicates that these improvements will result in only one intersection – Arroyo Parkway/California Boulevard – operating at LOS E in the future; no intersections will operate at LOS F.

**Significant Project Impact (Los Angeles County CMP):** Interstate 210 (I-210) at Rosemead Boulevard is projected to operate at LOS E in the eastbound direction under *2015 Future Year 2015 Base* with Project conditions. Based on application of the CMP significance criteria, the 2004 Land Use and Mobility Elements are projected to have a significant CMP impact at this location because the Project will cause deterioration to LOS F in the eastbound direction.

SR-134 at San Rafael Avenue will operate under *Future Year 2015 Base* conditions and *Future Year 2015 with Project* conditions at LOS F in both directions. The project will have a significant

CMP impact at this location because the Project will cause an increase of more than 0.02 in the volume/capacity ratio at this location.

**Finding:** Pursuant to CEQA Section 21081(a)(2) and CEQA Guidelines 15091(a)(2), changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Pursuant to CEQA Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), there are no feasible measures that would mitigate these impacts below a level of significance. As described in the Statement of Overriding Considerations, the City Council has determined that these impacts are acceptable because of specific overriding considerations.

**Facts in Support of Finding:** The 2004 Mobility Element includes transportation system management strategies (TSM) and intersection and corridor operational improvements that are expected to improve conditions within the City. The 2004 Mobility Element also contains Traffic Demand Management (TDM) programs and transit elements that are expected to reduce trip-making within the City, thus reducing impacts at each of the impacted CMP locations. With the Project, however, residual impacts are projected to remain in the westbound direction on SR-134 at San Rafael Avenue and eastbound on I-210 at Rosemead Boulevard (Final EIR, p. 89).

## **X. CUMULATIVE SIGNIFICANT EFFECTS AND MITIGATION MEASURES**

The CEQA Guidelines (Section 15355) define a cumulative impact as "an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." The Guidelines further state that "an EIR should not discuss impacts which do not result in part from the evaluated project."

Section 15130(a) of the CEQA Guidelines requires a discussion of cumulative impacts of a project "when the project's incremental effect is cumulatively considerable." Cumulatively considerable, as defined by Section 15065(c), "means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

The project is the adoption and implementation of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan. The 2004 Land Use and Mobility Elements will guide the overall physical development and circulation of the entire City through horizon year 2015. Thus, cumulative citywide impacts have been addressed in the preceding discussion in this Findings of Fact. A broader discussion of cumulative impacts in this section involves considering development beyond horizon year 2015 pursuant to 2004 Land Use Element policy, together with ambient growth in neighboring jurisdictions. The Central District Specific Plan will guide development and circulation within the Central District.

## **A. AIR QUALITY**

**Significant Cumulative Impacts:** The San Gabriel Valley is located within the South Coast Air Basin, where pollutant levels regularly exceed State and federal air quality standards. The basin is identified as a nonattainment area with regard to meeting federal standards for ozone (O<sub>3</sub>) and respirable particulate (PM<sub>10</sub>). Future development in Pasadena and throughout the San Gabriel Valley will continue to add pollutants to the atmosphere from both transportation and stationary sources. Potential cumulative air quality impacts will be partially reduced through implementation of SCAQMD's *Air Quality Management Plan* and policies and programs contained in local General Plans, including those in the 2004 Land Use and Mobility Elements. In particular, land use and transportation policies that encourage more compact development near transit centers will reduce mobile source emissions relative to conditions absent such policies. However, since the combined emissions from development in Pasadena and other cities within the San Gabriel Valley subregion will continue to exceed State and federal standards, cumulative air quality impact will be significant and unavoidable.

**Finding:** Pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required of or incorporated into the Project which substantially lessen the significant environmental effects identified in the Final Program EIR. These changes, however, will not reduce cumulative air quality impacts to a level below significance. Pursuant to CEQA Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), there are no feasible measures that would mitigate these impacts below a level of significance. As described in the Statement of Overriding Considerations, the City Council has determined that these impacts are acceptable because of specific overriding considerations.

**Facts in Support of Finding:** Potential short- and long-term cumulative air quality impacts would be substantially lessened by implementation of mitigation measures 1, 2, and 3 described in Section IX, subsection B of these Findings. These mitigation measures are feasible, will be required as a condition of approval on development projects, and will be made binding upon development entitlements through these Findings. Nevertheless, short- and long-term cumulative air quality impacts will remain significant and are unavoidable.

## **B. NOISE**

### **Significant Cumulative Impacts:**

#### **2004 Land Use Element, Zoning Code Revisions, and Central District Specific Plan**

Anticipated regional development in the San Gabriel Valley will generate short-term noise during the construction of individual development projects. Increased development densities will increase traffic volumes and associated long-term noise levels. Implementing local noise ordinances, constructing buildings according to State acoustical standards, and proper land use planning will reduce cumulative noise impact on residences, schools, hospitals, and other noise-sensitive uses.

Development pursuant to land use policies will contribute to an increase in traffic noise along freeway corridors. Cumulative noise levels along these corridors will result in the continued exposure of some residential areas to noise levels inconsistent with the City's noise/land use compatibility criteria. Interior noise levels of future residential development projects in these areas will be required to be reduced to at least 45 d(B)A, consistent with State Title 24 requirements. However, exterior sound levels cannot be mitigated; therefore, noise impact along these corridors will be cumulatively significant.

### **2004 Mobility Element**

The 2004 Mobility Element guides the continuing development of a multimodal circulation system. Growth will be targeted within the Central District and around light rail stations to capitalize on existing investments in transit and other public facilities. Residential neighborhoods will be protected from through traffic. In addition, the 2004 Mobility Element encourages the use of alternative modes of transportation, such as transit, bicycling, and walking. To protect residential neighborhoods, the Element provides strategies to reduce or manage volumes, travel speeds, and noise impacts on local streets by de-emphasizing residential streets and directing increased traffic to multimodal corridors.

Cumulative noise levels along these corridors will result in the continued exposure of some residential areas to noise levels inconsistent with the City's noise/land use compatibility criteria. Interior noise levels of future residential development projects in these areas will be required to be reduced to at least 45 dB(A), consistent with State Title 24 requirements. However, exterior sound levels cannot be mitigated; therefore, noise impact along these corridors will be cumulatively significant.

**Finding:** Pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required of or incorporated into the Project which substantially lessen the significant environmental effects identified in the Final Program EIR. These changes, however, will not reduce exterior sounds impacts to a level below significance. Pursuant to CEQA Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), there are no feasible measures that would mitigate these impacts below a level of significance. As described in the Statement of Overriding Considerations, the City Council has determined that these impacts are acceptable because of specific overriding considerations.

**Facts in Support of Finding:** Potential cumulative noise impacts would be substantially lessened by implementation of mitigation measures 1a through c described in Section IX, subsection D of these Findings. These mitigation measures are feasible, will be required as a condition of approval on development projects, and will be made binding upon development entitlements through these Findings. Nevertheless, cumulative noise impacts will remain significant and are unavoidable.

## **C. RECREATION**

### **Significant Cumulative Impacts:**

#### **2004 Land Use Element and Zoning Code Revisions**

Even though Pasadena is located directly adjacent to the Angeles National Forest, which offers numerous hiking and mountain biking trails and other recreational programs, impact with regard to recreation resources will be significant. Parkland acres in the City will remain below the standard level of service of 3 acres per 1,000 residents. According to this standard, the increase in population expected as a result of the 2004 Land Use Element will cause the City to experience a parkland deficit of approximately 159.85 acres by the year 2015. This standard, developed previously by the National Recreation and Parks Association, was used in the EIR analysis in the absence of a formally adopted City standard. Impact on City public parks and recreational facilities at full implementation of land use policy will be cumulatively significant.

### **Central District Specific Plan**

Even though the Central District is located adjacent to the Arroyo Seco, where many recreation opportunities are provided, parkland acreage will remain below the standard level of service within the Central District applying the National Recreation and Parks Service standard of 3 acres per 1,000 residents. Thus, impact on City public parks and recreational facilities at full implementation of the Central District Specific Plan will be cumulatively significant.

**Finding:** Pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required of or incorporated into the Project which substantially lessen the project's contribution to cumulatively significant environmental effects identified in the Final Program EIR. These changes, however, will not reduce cumulative impacts on parks and recreation to a level below significance. Pursuant to CEQA Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), there are no feasible measures that would mitigate these impacts below a level of significance. As described in the Statement of Overriding Considerations, the City Council has determined that these impacts are acceptable because of specific overriding considerations.

**Facts in Support of Finding:** The City will continue to provide and expand its community recreation activities and facilities as needed to support the community as it grows, and the Central District Specific Plan proposes several measures to provide recreational opportunities for its residents. However, land available for parks acquisition is at a minimum, and the City will continue to have a parkland deficit in the future; this impact will be significant and unavoidable. Potential impacts related to parkland and recreational activities and facilities can be reduced by implementation of mitigation measures 1 and 2 described in Section IX, subsection E. These mitigation measures are feasible, will be required as a condition of approval on development projects, and will be made binding upon development entitlements through these Findings.

### **D. UTILITIES AND SERVICE SYSTEMS**

**Significant Cumulative Impacts:** Future development in the City will contribute additional solid waste to the region's already strained solid waste disposal facilities. The California Waste Management Act of 1989 (AB 939) requires all cities to reduce waste in areas under their jurisdiction through source reduction, recycling, and composting. New development consistent with the 2004 Land Use Element will be required to comply with the City's solid waste reduction programs. However, since the County of Los Angeles projects a continuing shortage of landfill space, cumulative impact will be significant.

**Finding:** Pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required of or incorporated into the Project which avoid the project's contribution to cumulatively significant environmental effects identified in the Final Program EIR.

**Facts in Support of Finding:** Potential cumulative utilities and service systems impacts will be substantially lessened by implementation of mitigation measures 1 through 3 described in Section IX, subsection H of these Findings. These mitigation measures are feasible, will be required as a condition of approval on development projects, and will be made binding upon development entitlements through these Findings. However, the City does not have the ability to reduce solid waste generation at a regional level. Thus, cumulative solid waste impacts remain significant and are unavoidable.

## **E. TRANSPORTATION/TRAFFIC**

### **Significant Cumulative Impact:**

#### **2004 Land Use and Mobility Elements and Zoning Code Revisions**

As development occurs within Pasadena and Los Angeles County, traffic volumes on the regional road network will increase. Increased traffic associated with local and regional growth will result in 8.9% of citywide lane-miles operating at LOS E and F. As described on page 79 of the Final EIR, regional growth will contribute substantially to this impact. The cumulative impact will be 49.8 lane-miles operating at LOS E and F, with regional growth (absent the project) accounting for 47.8 lane-miles in horizon year 2015 (Final EIR, p. 79).

The increase of impacted lane-miles is expected to occur along designated multimodal corridors, which are generally those street segments serving freeway interchanges and streets paralleling the freeways.

Multimodal corridors are the City's major thoroughfares for movement within, to, and from Pasadena. These corridors create an environment where different modes of transportation are encouraged. Wherever appropriate, amenities for non-automobile users are provided along these corridors. Vehicular traffic will be directed to multimodal corridors and away from de-emphasized streets and residential neighborhoods. As shown in Figure 4 of Section 2.0 – Project Description, City-designated multimodal corridors include the following:

#### **North-South:**

- All of Lincoln Avenue within City limits
- All of Arroyo Parkway within City limits
- All of Fair Oaks Avenue within City limits
- Los Robles Avenue north of Del Mar Boulevard
- Lake Avenue between Woodbury and California Boulevard
- Hill Avenue between I-210 Freeway to Del Mar Boulevard
- Allen Avenue between Orange Grove Boulevard and Del Mar Boulevard
- All of Altadena Drive within City limits
- Sierra Madre Boulevard north of the freeway
- All of San Gabriel Boulevard within City limits
- All of Rosemead Boulevard within City limits

#### **East-West:**

- Woodbury Road between Los Robles Avenue and Lake Avenue
- Orange Grove Boulevard between SR-134 and Rosemead Boulevard
- All of Maple Street (one-way) within City limits
- All of Corson Street (one-way) within City limits
- Walnut Street between Orange Grove Boulevard and Foothill Boulevard
- All of Foothill Boulevard within City limits
- Union Street (one-way) between Fair Oaks Avenue and Hill Avenue
- All of Colorado Boulevard within City limits
- Green Street (one-way) between Fair Oaks Avenue and Hill Avenue
- Del Mar Boulevard between St. John Street to East City limit
- Glenarm Street between Fair Oaks Avenue and Arroyo Parkway

Under *Future Year 2015 with Project* conditions, which include regional traffic growth, the operation of the key intersections will deteriorate as both local Pasadena traffic and regional



background traffic increases. Even with the implementation of the Intelligent Transportation System elements called for in the 2004 Mobility Element, nine of the 18 study intersections are projected to operate at LOS E and F. These intersections are:

- Pasadena Avenue/California Boulevard
- Arroyo Parkway/Del Mar Boulevard
- Arroyo Parkway/California Boulevard
- Marengo Avenue/Colorado Boulevard
- Lake Avenue/Maple Street
- Lake Avenue/Colorado Boulevard
- Rosemead Boulevard/Foothill Boulevard
- Del Mar Boulevard/Hill Boulevard
- Sierra Madre Villa Avenue/Foothill Boulevard

In addition, as discussed under Thresholds Used to Determine Level of Impact, the City of Pasadena also defines a significant project impact if an intersection will experience a decline in the volume-to-capacity ratio as indicated in Table 14 in the Final EIR.

**Table 14**  
**Thresholds of Significance for Increases in LOS**

Existing LOS	Increases in LOS Due to Project
A	0.06 or greater
B	0.05 or greater
C	0.04 or greater
D	0.03 or greater
E	0.02 or greater
F	0.01 or greater

Source: City of Pasadena. *Traffic Impact Report Preparation Guidelines*. July 1999.

Using the City's criteria, under the *Future Year 2015 with Project* conditions, 15 of the 18 study intersections will experience a significant impact. These intersections are:

- St. John Avenue/California Boulevard
- Fair Oaks Avenue/Maple Street
- Fair Oaks Avenue/Corson Street
- Fair Oaks Avenue/Colorado Boulevard
- Arroyo Parkway/Del Mar Boulevard
- Arroyo Parkway/California Boulevard
- Marengo Avenue/Maple Street
- Marengo Avenue/Corson Street
- Marengo Avenue/Union Street
- Marengo Avenue/Colorado Boulevard
- Marengo Avenue/Green Street
- Lake Avenue/Corson Street
- Lake Avenue/Colorado Boulevard
- Rosemead Boulevard/Foothill Boulevard
- Sierra Madre Villa Avenue/Foothill Boulevard

Most of intersections that will operate at LOS E and F under *Future Year 2015 with Project* conditions and those intersections where the V/C change exceeds the City thresholds are located along multimodal corridors or near freeway on-/off-ramps. Figure 17 in the Final EIR shows that 11 of the intersections where the v/c change exceeds the City thresholds are located on streets that directly access I-210 (Fair Oaks Avenue, Marengo Avenue, and Lake Avenue). In addition, most of the impacted intersections are located on major arterials and not on collectors. This is the direct result of policies in the 2004 Mobility Element (described above) to protect neighborhoods from through traffic by forcing through traffic onto multimodal corridors (or major arterials). The LOS result on these streets can be explained in part by drivers (local and regional) accessing the freeway.

As described above under Section IX, subsection F of these Findings, the City has incorporated changes into the project to reduce impacts at study intersections. These project changes will work to lessen cumulative impacts.

#### **Central District Specific Plan**

As development occurs within the Central District, Pasadena as a whole, and the region, 6.3% of the studied lane-miles within the Central District will operate at LOS E and F in 2015. Twelve of the 18 study intersections analyzed in the EIR lie within the Central District. While implementation of 2004 Mobility Element policies within the Central District Specific Plan — such as transit-oriented and pedestrian-oriented development — may reduce the cumulative transportation/traffic impact to some extent, traffic generated by new development and population growth within the Central District, as well as in Pasadena and surrounding communities over the next 19 years<sup>2</sup>, will continue to contribute to overall traffic congestion in the region.

**Finding:** Pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required of or incorporated into the Project which substantially lessen the project's contribution to cumulatively significant environmental effects identified in the Final Program EIR. These changes, however, will not completely reduce impacts on the local roadway system to a level below significance. Pursuant to CEQA Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), there are no additional feasible measures that would mitigate these impacts below a level of significance. As described in the Statement of Overriding Considerations, the City Council has determined that these impacts are acceptable because of specific overriding considerations.

**Facts in Support of Finding:** Potential cumulative transportation/traffic impacts would be substantially lessened by implementation of the City strategies and changes to the Mobility Element listed in Section IX, subsection F of these Findings. These changes are feasible, will be required as condition of approval on development applications or as City capital improvement projects, and will be made binding upon development entitlements as applicable through these Findings. Nevertheless, cumulative transportation/traffic impacts would remain significant and are unavoidable.

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<sup>2</sup> For the purposes of the EIR analysis and consistent with SCAG growth projections, buildout is assumed to be the year 2025.

## **XI. GROWTH-INDUCING IMPACTS**

CEQA Guidelines Section 15126.2(d) requires that an EIR discuss the growth-inducing impact of the proposed project. Growth-inducement includes, "...ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which will remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas)."

### **2004 Land Use Element and Zoning Code Revisions**

The 2004 Land Use Element and the Zoning Code Revisions (the primary implementing tool of the General Plan) are specifically intended to provide for the orderly growth of Pasadena, define the limits of that growth, and act as a mechanism to accommodate and control future growth. Development pursuant to the 2004 Land Use Element will provide needed housing for all income levels, create compact and pedestrian-friendly urban development, and recycle underutilized infill areas within seven focus areas to higher land uses within an already urbanized area. Overall, the anticipated population growth will continue the City's relatively modest growth pattern, with an average population growth of approximately 1.1% per year. The 2004 Land Use Element policies will result in a more inclusive community, maintain a balance between housing and employment, and foster a stable economic base. It will create diverse employment opportunities for residents of Pasadena and the surrounding area contributing to the area's economic and fiscal growth, consistent with goals and objectives of regional plans. No significant growth-inducing impact will occur that will conflict with long-range regional growth management objectives (Final EIR, p. 251).

### **2004 Mobility Element**

The 2004 Mobility Element includes focused circulation improvements on multimodal corridors throughout the City, with the goal of improving the operating efficiency of the existing traffic network and protecting residential neighborhoods from through traffic. The extension of urban infrastructure into previously undeveloped areas will not occur as a result of the 2004 Mobility Element. No significant growth-inducing impact will occur that will conflict with long-range regional growth management objectives (Final EIR, p. 251).

### **Central District Specific Plan**

Development pursuant to the Central District Specific Plan will provide needed housing for all income levels, create compact and pedestrian-friendly urban development, recycle underutilized infill areas to higher land uses within the City's urban core, and make it possible to circulate in Pasadena without the use of cars by concentrating development around transit villages. The anticipated population growth within the Central District will be substantial as a result of 2004 Land Use Element, in that the Element targets approximately half of all future development within this specific plan area. However, population growth within the Central District Specific Plan area is consistent with City and regional growth forecasts and is the intended policy of the 2004 Land Use Element. The 2004 land use policies will result in a more inclusive community, maintain a balance between housing and employment, and foster a stable economic base. It will create diverse employment opportunities for residents of the Central District, the City, and the surrounding area, contributing to the area's economic and fiscal growth, consistent with goals and objectives of local and regional plans. No significant growth-inducing impact will occur that will conflict with long-range regional growth management objectives (Final EIR, p. 252).

## **XII. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES**

### **2004 Land Use and Mobility Elements and Zoning Code Revisions**

Adoption and implementation of the 2004 Land Use and Mobility Elements, with the Zoning Code Revisions as the implementing tool, will result in impacts on the local environment which will affect both short-term uses and the maintenance and enhancement of long-term usage of land within the City.

The 2004 Land Use Element policies will allow for infill development primarily targeted in the seven specific plan areas around the Gold Line light rail stations within City limits. In general, the irreversible land use changes resulting from adoption and implementation of the 2004 Land Use and Mobility Elements will be beneficial rather than detrimental. According to the Guiding Principles of the 1994 General Plan,<sup>3</sup> the changes will:

- Target growth to serve community needs and enhance the quality of life.
- Harmonize change to preserve Pasadena's historic character and environment.
- Promote economic vitality to provide jobs, services, revenues, and opportunities.
- Promote a healthy family community.
- Create a city where people can circulate without cars.
- Promote Pasadena as a cultural, scientific, corporate, entertainment, and educational center for the region.
- Encourage community participation as a permanent part of achieving a greater city.

Irreversible commitments of limited resources include the use of lumber and other related forest products, sand, gravel, and concrete; asphalt; petrochemical construction materials; steel, copper, lead and other materials; and water consumption. Development of properties pursuant to the 2004 land use policies will involve a long-term commitment to the consumption of fossil fuel oil and natural gas. Increased energy demands will result from construction, lighting, heating, and cooling of residences and commercial facilities, and transportation of people within, to, and from Pasadena.

### **Central District Specific Plan**

Adoption and implementation of the Central District Specific Plan will result in impacts on the local environment which will affect both short-term uses and the maintenance and enhancement of long-term usage of land within the City. Specific plan policies will allow for infill development at higher density uses than currently exist in close proximity to Gold Line light rail stations and other major public transit corridors, and within the City's compact urban core. In general, the irreversible land use changes resulting from adoption and implementation of the Central District Specific Plan will be beneficial rather than detrimental. According to the Central District Specific Plan Vision,<sup>4</sup> the changes accomplish the following:

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<sup>3</sup> City of Pasadena. *Land Use Element*. June 2003.

<sup>4</sup> Central District Specific Plan. "Vision Statement." Page 30.

- Central District will function as Pasadena's vibrant urban core with a distinctive character.
- Downtown will provide a diversity of economic, residential, and cultural opportunities.
- Downtown will be a place to live, work, shop, and play.
- Downtown will provide a convenient access by foot, bicycle, and transit, as well as by car.
- Physical and economic growth will be harmonized to enhance existing businesses, respect neighborhoods, and respect the numerous resources of historical and cultural significance that contribute to Downtown's unique identity.

Irreversible commitments of limited resources resulting from implementation of the Central District Specific Plan, as discussed above, include the use of lumber and other related forest products, sand, gravel, and concrete; asphalt; petrochemical construction materials; steel, copper, lead, and other materials; and water consumption. Development of properties pursuant to specific plan policies will involve a long-term commitment to the consumption of fossil fuel oil and natural gas. Increased energy demands will result from construction, lighting, heating, and cooling of residences and commercial facilities, and transportation of people within, to, and from the Central District, Pasadena, and the region (Final EIR, p. 252 through 253).

### XIII. FEASIBILITY OF POTENTIAL PROJECT ALTERNATIVES

Because the Project will result in unavoidable significant environmental effects, as outlined in Section X and Section XI of these Findings, the City must consider the feasibility of any environmentally superior alternative to the Project, as finally approved. The City must evaluate whether one or more of these alternatives could avoid or substantially lessen the unavoidable significant environmental effect(s). (Citizens for Quality Growth v. City of Mount Shasta, 198 Cal. App. 3d 433, 243 Cal. Rptr. 727 (1988); see also Pub. Res. Code Section 21002.)

Because an alternative or alternatives may result in reduced impacts in some areas but not others, resulting in a need to balance impacts against City policies and objectives, these Findings contrast and compare the alternatives analyzed in the Final Program EIR with the Project.

In general, in preparing and adopting findings, a lead agency need not necessarily address the feasibility of both mitigation measures and environmentally superior alternatives when contemplating the approval of a project with significant impacts. Where the significant impacts can be mitigated to an acceptable (less than significant) level solely by the adoption of mitigation measures, the agency, in drafting its findings, has no obligation to consider the feasibility of environmentally superior alternatives, even if their impacts would be less severe than those of the Project as mitigated. (Laurel Heights Improvement Ass'n v. Regents of the University of California, 47 Cal. 3d 376, 253 Cal. Rptr. 426 [1988]; Laurel Hills Homeowners Ass'n v. City Council, 83 Cal. App. 3d 515, 147 Cal. Rptr. 842 [1978]; see also Kings County Farm Bureau v. City of Hanford, 221 Cal. App. 3d 692, 270 Cal. Rptr. 650 [1990]). Accordingly, for this Project, in adopting the findings concerning Project alternatives, the City Council

considers only those environmental impacts that for the finally Approved Project are significant and cannot be avoided or substantially lessened through mitigation.

Implementation of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan will result in significant unavoidable project-level and cumulative environmental impacts in the following areas:

- Transportation/Traffic
- Noise
- Air Quality
- Parks and Recreation
- Solid waste (cumulative only)

Because Pasadena lies within an air basin that is a non-attainment area for State and federal air quality standards, increased emissions will result in a significant impact on regional air quality. Implementation of the recommended circulation system improvements in the 2004 Mobility Element will help reduce traffic impacts; nonetheless, combined with the regional increases in traffic volumes, the Project will result in a significant impact. Continued development in the region, combined with an anticipated landfill shortage in Los Angeles County, will result in a significant impact on waste disposal facilities. Future development will generate construction noise from individual development projects that may affect adjoining uses in the short term. Increased traffic noise may significantly impact residences, schools, and hospitals near the freeways in the long term. While policies included in the 2004 Land Use Element will reduce these impacts to the extent possible, the residual impacts will still be significant (Final EIR, p. 205).

Where significant environmental effects remain even after application of all feasible mitigation measures identified in the Final Program EIR, decision makers must evaluate the Project alternatives identified in the Final Program EIR. Under these circumstances, CEQA requires findings on the feasibility of Project alternatives. If no Project alternatives are feasible, decision makers must adopt a Statement of Overriding Considerations with regard to the Project. If there is a feasible alternative to the Project, decision makers must decide whether it is environmentally superior to the Project. Proposed Project alternatives considered must be ones which "could feasibly attain the basic objectives of the Project." However, the Guidelines also require an EIR to examine alternatives "capable of eliminating" environmental effects even if these alternatives "would impede to some degree the attainment of the project objectives" (CEQA Guidelines Section 15126[d]).

CEQA provides the following definition of the term "feasible," as it applies to the findings requirement: "'Feasible' means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors" (Public Resources Code Section 21061.1). The CEQA Guidelines provide a broader definition of "feasibility" that also encompasses "legal" factors. CEQA Guidelines Section 15364 states, "The lack of legal powers of an agency to use in imposing an alternative or mitigation measure may be as great a limitation as any economic, environmental, social or technological factor."

Accordingly, "feasibility" is a term of art under CEQA and thus is afforded a different meaning as may be provided by a dictionary or other source. Moreover, CEQA Section 21081 governs the "findings" requirement under CEQA with regard to the feasibility of alternatives and states, in pertinent part, that:

... no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the Project is approved or carried out unless the public agency makes one or more of the following findings: (a)(3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

The concept of "feasibility," therefore, as it applies to findings, involves a balancing of various economic, environmental, social, legal and technological factors. (See Pub. Res. Code § 21061.1; CEQA Guidelines Section 15364; Public Resources Code Section 21081; see also City of Del Mar v. City of San Diego, 133 Cal. App. 3d 401, 414-417 [1992].)

In City of Del Mar v. City of San Diego, 133 Cal. App. 3d 401, 415-417 (1992), the Court found that the City of San Diego had "... considered and reasonably rejected ... [certain] project alternatives ... as infeasible in view of the social and economic realities in the region." (Id at 417.) The Court determined that the City of San Diego had attempted to accommodate the feasibility factors based on its growth management plan, which included the proposed development project. Accordingly, the Court concluded:

Assuming this accommodation is a reasonable one (citation omitted), San Diego is entitled to rely on it in evaluating various project alternatives. The cost-benefit analysis which led to the accommodation is of course subject to review, but it need not be mechanically stated at each stage of the approval process. In this sense, "feasibility" under CEQA encompasses "desirability" to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors. We accordingly conclude that San Diego did not abuse its discretion under CEQA in rejecting the various project alternatives as infeasible. (Id.)

These Findings contrast and compare the alternatives where appropriate to demonstrate that the selection of the finally approved Project, while still resulting in significant environmental impacts, has substantial environmental, planning, fiscal and other benefits. These benefits are discussed in detail in Section XIV. In rejecting all of the alternatives, the City Council has examined the approved Project objectives and weighed the ability of the various alternatives to meet the objectives. The decision makers believe that the Project best meets the approved Project objectives with the least environmental impact.

The Project Goals and Objectives identified by the City in the Final Program EIR include:

#### **2004 Land Use Element**

The following are City goals stated in the 2004 Land Use Element:

- Growth will be targeted to serve community need and enhance the quality of life.
- Change will be harmonized to preserve Pasadena's historic character and environment.
- Economic vitality will be promoted to provide jobs, services, revenues, and opportunities.

- Pasadena will be promoted as a healthy family community.
- Pasadena will be a city where people can circulate without cars.
- Pasadena will be promoted as a cultural, scientific, corporate, entertainment, and educational center for the region.
- Community participation will be a permanent part of achieving a greater city.

#### **2004 Mobility Element**

The 2004 Mobility Element states the following goals:

- Livable and economically strong community will be promoted.
- Non-auto travel will be encouraged.
- Neighborhoods will be protected by discouraging traffic from intruding into community neighborhoods.
- Traffic on multimodal corridors will be managed to promote and improve citywide transportation services.

#### **Zoning Code Revisions**

The City aims to achieve the following goals through adoption of the Zoning Code Revisions:

- Provide land use regulations and development standards consistent with the updated General Plan Land Use, Mobility and other elements, including redefining existing and creating new zoning districts, regulations, and standards.
- Enhance the ease of use of the Zoning Code by consolidating common regulations across the zoning districts.
- Provide for flexibility of land use regulations and development standards reflective of the unique characteristics of each specific plan area.
- Identify methods to streamline the review and approval process while improving the effectiveness of dealing with large projects of community wide significance.
- Define environmental performance standards.

#### **Central District Specific Plan**

The City aims to achieve the following objectives by adopting and implementing the Central District Specific Plan:

- Central District will function as Pasadena's vibrant urban core with a distinctive character.



- Downtown will provide a diversity of economic, residential, and cultural opportunities.
- Downtown will be a place to live, work, shop, and play.
- Downtown will provide a convenient access by foot, bicycle, and transit, as well as by car.
- Physical and economic growth will be harmonized to enhance existing businesses, respect neighborhoods, and respect the numerous resources of historical and cultural significance that contribute to Downtown's unique identity.

The Final Program EIR for the Project examined a broad range of reasonable alternatives to the Project to determine whether Project objectives could be met while avoiding or substantially lessening one or more of the Project's significant, unavoidable impacts. Adoption of the 2004 Land Use Element and Zoning Code Revisions will result in unavoidable significant impacts with regard to transportation/traffic, air quality, noise, and parks/recreation. Impacts of the 2004 Land Use Element and Zoning Code Revisions will result in a significant light and glare impact that will be reduced to a less than significant level with implementation of mitigation. The 2004 Mobility Element will result in unavoidable significant impacts with regard to transportation/traffic, air quality, and noise. The Central District Specific Plan will result in unavoidable significant impacts with regard to transportation/traffic, air quality, and parks/recreation. Because the Project has identified significant and unavoidable impacts and none of the examined alternatives would avoid these impacts, the City has properly considered and reasonably rejected Project alternatives as infeasible pursuant to CEQA.

#### **A. ALTERNATIVE 1: NO PROJECT**

The No Project Alternative (Future Year 2015 conditions without the project) assumes that the 1994 General Plan remains as the adopted long-range planning policy document for Pasadena. The No Project Alternative represents conditions that would exist in 2015 if development within Pasadena and the region continued to grow at the pace projected in the 1994 Land Use Element, and if the 1994 Mobility Element improvements and policies were implemented by the Year 2015.

A number of transportation improvements are already funded and many were under construction at the beginning of the 2004 Mobility Element process. These committed improvements are included in the No Project Alternative because they will be implemented even if the 2004 Mobility Element were not part of the project. The No Project Alternative does not assume that the Gold Line light rail service will be extended to Claremont. The completion of I-710 from I-210 southerly to I-10 is assumed under the No Project Alternative Plans.

Buildout pursuant to the 1994 General Plan would allow current development patterns and thresholds to continue to guide development. The 1994 Land Use Element identified seven specific plan areas considered most appropriate and suitable for mixed-use development, with densities that support transit use and pedestrian-oriented environments. Each specific plan establishes a limit on total development within that area. The City estimates that approximately the equivalent amount of development would occur under the 1994 Land Use Element as is projected for the 2004 Land Use Element between the years 2004 and 2015.

Currently there are caps on the number of residential units and square feet of nonresidential within the subdistricts of the Central District. Two of the subdistricts have been developed up to the allotted residential units, and the allocations within other subdistricts will soon run out. With the Central District Specific Plan, the development caps would be replaced with floor-area ratio (FAR) limits allowing for increased housing development. Under the No Project Alternative, in those subdistricts where the residential development allotment has been exhausted, new development would consist of additional nonresidential square footage.

## **1. Significant and Unavoidable Impacts**

**Transportation/Traffic:** Under the No Project Alternative, similar to the Project, continued implementation of the 1994 General Plan would result in approximately 6,581 net new residential units and approximately 4,973,065 net new square feet of nonresidential development. Both the No Project Alternative and the project concentrate new development within the Central District. However, the transportation improvements listed in the 2004 Mobility Element would not be implemented. Vehicular travel would be expected to increase with population growth. In year 2015 with the No Project Alternative (1994 General Plan), 63.0 total lane-miles citywide, or 11.4% of the lane-miles studied, would be projected to operate at LOS E and F (compared to 49.8 lane-miles, or 8.9% citywide lane-miles, for the Project).

Within the Central District, 8.2 lane-miles, or 9.0% of the lane-miles analyzed within the Central District, would operate at LOS E and F, compared to 5.7 lane-miles, or 5.4% lane-miles within the Central District, for the Project (Final EIR, pp. 208-209).

**Public Services and Recreation:** The No Project Alternative would result in approximately the same amount of population growth as the Project, or 158,213 persons in 2015. Thus, the demand for public services would be the same, and Pasadena would continue to exceed the standard of 3 acres of local parkland per 1,000 residents, as would occur with the project (Final EIR, p. 209).

**Noise:** Similar to the proposed project, the No Project Alternative would potentially allow future residential development, under some conditions, to locate in areas where noise/land use conflicts cannot be fully mitigated. These areas are directly associated with proximity of residential neighborhoods and mixed-use areas to the freeways (Final EIR, p. 209).

**Air Quality:** Air pollutant emissions are tied to traffic volumes. As a result of increased vehicle trips and increased delays at intersections located throughout the planning area, air pollutant emissions would be expected to increase, and CO hot spots could be created at some intersections (Final EIR, p. 209).

## **2. Project Objectives**

The No Project Alternative would not implement the 2004 Land Use and Mobility Element, Zoning Code Revisions, and Central District Specific Plan. Therefore, the No Project Alternative would not meet the objectives of the proposed Project (Final EIR, p. 210).

## **3. Conclusion**

The No Project Alternative would have comparable environmental impacts with respect to land use and planning, aesthetics, population and housing, public services, and utilities and service systems as the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central

District Specific Plan. However, the percent increase in significantly impacted lane-miles citywide and within the Central District would be higher with the No Project Alternative. Thus, since traffic volumes affect air quality and noise conditions, the No Project Alternative would also have slightly greater impacts with respect to air quality and noise. The City rejects the No Project Alternative because it does not meet most of the basic project objectives as effectively as the Project (see *City of Del Mar*, *supra*, 133 Cal. App. 3d at 417; *Sequoiah Hills*, *supra*, 23 Cal. App. 4th at 715.).

## **B. ALTERNATIVES 2A AND 2B: REDUCED GROWTH**

The Reduced Growth Alternatives assume reduced future development growth citywide, with growth limits of 75% and 50%, respectively, relative to the development thresholds identified for the Project. The transportation improvements described in the 2004 Mobility Element would be implemented. The completion of I-710 from I-210 southerly to I-10 and extension of the Gold Line light rail service to Claremont are *not* assumed to be completed under the Reduced Growth Alternatives. The difference between these alternatives and the Project is reduced growth within Pasadena.

### ***Alternative 2A: 75% Growth of the Proposed Project***

The 75% Growth Alternative assumes 75% of the growth associated with the proposed Project. Approximately 4,936 net new residential units and 3,732,049 net new nonresidential square footage would be developed. Impacts associated with the 75% Growth Alternative, like the project, would not significantly impact aesthetics, cultural resources, geology and soils, hazards and hazardous materials, and hydrology, as these impacts are not identified as significant for the project and thus would not be significant with reduced growth potential.

#### **1. Significant and Unavoidable Impacts**

**Transportation/Traffic:** The transportation improvements listed in the 2004 Mobility Element would be implemented under the 75% Growth Alternative. However, relative to the proposed Project, the number of vehicle trips would be lesser. According to the Project traffic study<sup>5</sup>, approximately 42.2 lane-miles, or 7.5% citywide lane-miles, would operate at LOS E and F under the 75% Growth Alternative, compared to 49.8 lane-miles, or 8.9% citywide lane-miles, for the Project.

Traffic conditions within the Central District would also improve under the 75% Growth Alternative relative to the Project. A total of 3.8 lane-miles, or 4.2% of lane-miles in the Central District would operate at LOS E and F under the 75% Growth Alternative, compared to 5.7 lane-miles, or 5.4% lane-miles within the Central District for the project (Final EIR, p. 211).

**Noise:** Similar to the proposed project, the 75% Growth Alternative would have the potential to allow future residential development, under some conditions, to locate in areas where noise/land use conflicts cannot be fully mitigated. These areas are directly associated with proximity to the freeways (Final EIR, p. 212).

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<sup>5</sup> Kaku & Associates. *Transportation Analysis for the Land Use and Mobility Elements of the General Plan, Central District Specific Plan, and Revised City Zoning Code*. Prepared for the City of Pasadena Department of Transportation. May 23, 2004.

**Public Services and Recreation:** The 75% Growth Alternative would result in approximately 1,645 fewer new residents in Pasadena, and the demand for public services would be reduced under this alternative. However, with a future population of 153,969 persons and a required 462 acres of parkland in the City, Pasadena would continue to exceed the standard of 3 acres of local parkland per 1,000 residents, as would occur with the Project (Final EIR, p. 212).

**Air Quality:** Air quality is closely tied to traffic volumes. As a result of a lower number of vehicle trips and reduced delays at intersections throughout the planning area, air pollutant emissions would be expected to decrease compared to the Project (Final EIR, p. 212).

## **2. Project Objectives**

With the 75% Growth Alternative, Pasadena would not fully achieve its goal of providing housing for a "healthy family community" because 1,645 fewer residential units would be developed. Pasadena would not meet its Regional Housing Needs Assessment (RHNA) target for very-low-, low-, moderate-, and above-moderate-income housing. The 75% Growth Alternative would result in fewer lower-income housing units than could be provided by policies associated with the Project. Furthermore, Pasadena would not promote a high level of economic vitality by limiting the amount of new development that could occur within the City. The City also would not encourage the same level of new jobs, services, revenues, and other opportunities that are anticipated to result from policies in the 2004 Land Use Element (Final EIR, p. 212).

## **3. Conclusion**

Although Alternative 2A: 75% Growth of the Proposed Project would result in reduced air quality and transportation/traffic impacts relative to the project and thus has been found to be environmentally preferred, the City finds that the difference is not substantial and that the Alternative would not avoid the significant and unavoidable transportation/traffic impacts associated with the Project. The City rejects Alternative 2A: 75% Growth of the Proposed Project because it does not meet most of the basic project objectives as effectively as the Project (see *City of Del Mar*, *supra*, 133 Cal. App. 3d at 417; *Sequoiah Hills*, *supra*, 23 Cal. App. 4th at 715).

### ***Alternative 2B: 50% Growth of the Proposed Project Alternative***

Alternative 2B would result in approximately 3,291 net new residential units and 2,486,534 net new square feet of nonresidential development. Impacts associated with the 50% Growth Alternative, like the project, would not significantly impact aesthetics, cultural resources, geology and soils, hazards and hazardous materials, and hydrology, as these impacts are not identified as significant for the project and thus would not be significant with reduced development potential.

## **1. Significant and Unavoidable Impacts**

**Land Use and Planning:** This Alternative would place a cap on all new residential development citywide at 3,291 net new residential units, or half of the residential units of the project. While the City would be able to meet its RHNA goal of 1,777 for the current (through 2006) planning period, the City may face difficulties in meeting future RHNA housing obligations for very-low-, low-, moderate-, and above-moderate income housing. This alternative might result in fewer lower-income units. The City would also be in conflict with SCAG's regional population growth projections (Final EIR, p. 213).

**Transportation/Traffic:** The transportation improvements and policies of the 2004 Mobility Element would be implemented under the 50% Growth Alternative. However, the number of vehicle trips would be reduced relative to the Project. A total of 35.8 lane-miles, or 6.4% of the citywide lane-miles, would operate at LOS E and F under the 50% Growth Alternative, compared to 49.8 lane-miles, or 8.9% citywide lane-miles, for the project. A total of 3.3 lane-miles, or 3.5% of lane-miles within the Central District would operate at LOS E and F under the 50% Growth Alternative, compared to 5.7 lane-miles or 5.4% lane-miles within the Central District, for the Project (Final EIR, pp. 213-214).

**Noise:** Similar to the Project, the 50% Growth Alternative would have the potential to allow future residential development, under some conditions, to locate in areas where noise/land use conflicts cannot be fully mitigated. These areas are directly associated with proximity to the freeways. However, with half the amount of new residential development as the project, fewer residences would likely be built within the portions of the City that are affected by conditionally unacceptable noise levels for residential uses (Final EIR, p. 214).

**Population and Housing:** A 50% citywide reduction in development, or 3,291 residential units would result in reduced population growth relative to the project since population is generated by new development. The 50% Growth Alternative would result in approximately 8,491 additional persons (based on 2.58 persons per household and 3,291 net new residential units), for a total population of 149,725 persons in 2015. The growth rate under the 50% Growth Alternative would be 0.5%, compared to 1.1% with the Project, and therefore below SCAG's regional population growth projections of 1.0% per year (Final EIR, p. 214).

**Public Services and Recreation:** The 50% Growth Alternative would result in approximately 1,645 fewer new residents in Pasadena, and the demand for public services would be reduced under this alternative. However, with a future population of 149,725 persons and a required 449 acres of parkland, Pasadena would continue to exceed the standard of 3 acres of local parkland per 1,000 residents, as would occur with the Project (Final EIR, p. 214).

## **2. Project Objectives**

With the 50% Growth Alternative, Pasadena would not fully achieve its "healthy family community" goals because only half of the projected residential units would be developed and specifically, fewer low-income housing units. Furthermore, Pasadena would not fully promote economic vitality by limiting the amount of development that could occur within the City. The 50% Growth Alternative would not encourage the same level of new jobs, services, revenues, and other opportunities associated with the 2004 Land Use Element (Final EIR, p. 215).

## **3. Conclusion**

Although Alternative 2B: 50% Growth of the Proposed Project would result in reduced transportation/traffic and air quality impacts relative to the Project, the Alternative would conflict with SCAG's regional population projections and the City would have difficulty meeting its RHNA for very- low-, low-, moderate-, and above-moderate income housing. The City rejects the Alternative because it does not meet most of the basic project objectives as effectively as the Project (see City of Del Mar, *supra*, 133 Cal. App. 3d at 417; Sequoyah Hills, *supra*, 23 Cal. App. 4th at 715).

## **C. ALTERNATIVES 3A, 3B, AND 3C: EXTENSION OF THE GOLD LINE**

This series of alternatives assumes that Gold Line light rail service is extended from the east side of Pasadena to the City of Claremont. These alternatives assume implementation of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan. The extension of the I-710 Freeway is not assumed to be completed under this series of alternatives. In the analysis, the City recognizes that it has no jurisdiction regarding Gold Line extension.

### ***Alternative 3A: Proposed Project and Extension of the Gold Line to Claremont***

Alternative 3A: Proposed Project and Extension of the Gold Line, like the Project, would not significantly impact aesthetics, cultural resources, geology and soils, hazards and hazardous materials, and hydrology, as these impacts are not identified as significant for the Project and thus would not be significant with extension of light rail services beyond and outside of Pasadena. Alternative 3A would result in the same amount of development as the Project and thus would have the same impacts on land use and planning, population and housing, aesthetics, public services and recreation, and utilities and service systems.

#### **1. Significant and Unavoidable Impacts**

**Transportation/Traffic:** With Alternative 3A, the number of vehicle trips within the City would be expected to decrease with extension of the Gold Line, as more commuters would be assumed to use the service instead of driving. As a result, fewer trips inbound and outbound to and from Pasadena would occur in the same direction as the current predominant direction of travel (inbound in the morning and outbound in the afternoon), as commuters and residents would opt to take the Gold Line light rail service to pass through Pasadena to Downtown Los Angeles. Thus, this alternative would decrease congestion by reducing trips in the peak direction of flow. A total of 47.0 lane-miles, or 8.4% of citywide lane-miles, would operate at LOS E and F under Alternative 3A, compared to 49.8 lane-miles, or 8.9% citywide lane-miles, for the Project. Within the Central District, 2.2 lane-miles (2.4%) would operate at LOS E and F with Alternative 3A, compared to 5.7 lane-miles (5.4% of lane-miles analyzed) within the Central District for the Project (Final EIR, pp. 216-217).

**Noise:** Similar to the project, Alternative 3A would have the potential to allow future residential development, under some conditions, to locate in areas where noise/land use conflicts cannot be fully mitigated. These areas are directly associated with proximity to the freeways (Final EIR, p. 217).

**Air Quality:** Air quality is closely tied to traffic volumes. As a result of decreased vehicle trips and reduced delays at intersections throughout the planning area, air pollutant emissions would be expected to be lower than those associated with the Project (Final EIR, p. 217).

#### **Public Services and Recreation**

Similar to the project, Pasadena would continue to exceed the National Recreation and Parks Service standard of 3 acres of local parkland per 1,000 residents (which is used in this EIR in the absence of an existing City standard) (Final EIR, p. 217).

#### **2. Project Objectives**

Under Alternative 3A: Proposed Project and Extension of the Gold Line, the goals and objectives outlined in the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan would be met (Final EIR, p. 217).

### **3. Conclusion**

Alternative 3A: Proposed Project and Extension of the Gold Line would result in reduced traffic and air quality impacts relative to the Project and would not have significant impacts on aesthetics, cultural resources, geology and soils, hazards and hazardous materials, and hydrology. However, the City rejects Alternative 3A as infeasible because City of Pasadena does not have the jurisdictional authority to implement Alternative 3A, as the responsibility of extending the Gold Line belongs to the MTA (see City of Del Mar, *supra*, 133 Cal. App. 3d at 417; Sequoia Hills, *supra*, 23 Cal. App. 4th at 715).

#### ***Alternative 3B: 75% Growth of the Proposed Project and Extension of the Gold Line to Claremont***

Alternative 3B: 75% Growth and Extension of the Gold Line, like the Project, would not significantly impact cultural resources, geology and soils, hazards and hazardous materials, and hydrology, as these impacts are not identified as significant for the Project and thus would not be significant with reduced development potential. Alternative 3B would result in 75% of the total amount of development associated with the Project. Impacts with respect to population and housing and utilities and service systems would be reduced compared to the Project.

### **1. Significant and Unavoidable Impacts**

**Traffic/Transportation:** Under Alternative 3B, the number of vehicle trips within the City would be less than those associated with the Project since the Alternative would produce 75% of the residential units and nonresidential square footage and would benefit from the extension of Gold Line light rail service east to Claremont. Fewer trips inbound and outbound in the same direction as the current predominant direction of travel (inbound in the morning and outbound in the afternoon) would result, as commuters and residents would opt to take the Gold Line light rail service to pass through Pasadena to Downtown Los Angeles. Thus, Alternative 3B would result in reduced congestion due to a fewer trips in the peak direction of flow. A total of 39.1 lane-miles, or 7.0% of citywide lane-miles, would operate at LOS E and F under Alternative 3B, compared to 49.8 lane-miles, or 8.9% citywide lane-miles, for the Project. Within the Central District, approximately 1.8 lane-miles, or 1.9% of lane-miles within the Central District, would operate at LOS E and F as a result of Alternative 3B, compared to 5.7 lane-miles (5.4% of lane-miles analyzed) within the Central District for the Project (Final EIR, pp. 218-219).

**Noise:** Similar to the Project, Alternative 3B would have the potential to allow future residential development, under some conditions, to locate in areas where noise/land use conflicts cannot be fully mitigated. These areas are directly associated with proximity to the freeways (Final EIR, p. 219).

**Air Quality:** Air quality is closely tied to traffic volumes. As a result of decreased vehicle trips and reduced delays at intersections located throughout the planning area, air pollutant emissions would be expected to decrease relative to the Project (Final EIR, p. 219).

**Public Services and Recreation:** Alternative 3B would result in approximately 1,645 fewer new residents in Pasadena, and the demand for public services would be reduced under this

alternative. However, with a future population of 153,969 persons and a required 462 acres of parkland in the City, Pasadena would continue to exceed the standard of 3 acres of local parkland per 1,000 residents, as would occur with the project (Final EIR, p. 219).

## **2. Project Objectives**

With Alternative 3B: 75% Growth and Extension of the Gold Line, the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan would be implemented. Impacts associated with Alternative 3B, like the project, would not significantly impact cultural resources, geology and soils, hazards and hazardous materials, and hydrology. Alternative 3B would result equivalent impacts on land use and planning, noise, and aesthetics as the proposed Project. Since Alternative 3B would produce 75% of the total projected development of the Project, Alternative 3B would result in reduced population and housing, traffic and air quality impacts, and reduced demand on public services, recreation, and utilities and service systems. However, Alternative 3B would not achieve all of the objectives of the Project. Pasadena would not fully achieve the guiding principle to be a "healthy family community," as 1,645 fewer residential units would be developed under the Alternative 3B (Final EIR, p. 219).

## **3. Conclusion**

Although Alternative 3B: 75% Growth and Extension of the Gold Line would result in slightly reduced impacts with respect to population and housing, traffic, and air quality, Pasadena would not fully achieve the guiding principle to promote economic vitality if it were to limit the amount of development that could occur within the City, and the City could have difficulty meeting its RHNA for very-low-, low-, moderate-, and above-moderate-income housing. This alternative would not encourage the same level of new jobs, services, revenues, and other opportunities that would be generated by the land use policies contained in the 2004 Land Use Element. The City rejects Alternative 3B as infeasible because the City of Pasadena does not have the jurisdictional authority to implement Alternative 3B, as the responsibility of extending the Gold Line belongs to the MTA (see City of Del Mar, supra, 133 Cal. App. 3d at 417; Sequoiah Hills, supra, 23 Cal. App. 4th at 715). Also, Alternative 3B does not meet basic project objectives as effectively as the Project.

### ***Alternative 3C: 50% Growth of the Proposed Project and Extension of the Gold Line to Claremont***

Alternative 3C: 50% Growth and Extension of the Gold Line, like the Project, would not significantly impact aesthetics, cultural resources, geology and soils, hazards and hazardous materials, and hydrology, as these impacts are not identified as significant for the Project and thus would not be significant. Alternative 3C would result in approximately 3,291 net new residential units and 2,486,534 net new square feet of nonresidential development; impacts with respect to public services, recreation, and utilities and service systems would be reduced somewhat compared to the Project due to a lower future population.

## **1. Significant and Unavoidable Impacts**

**Land Use and Planning:** Alternative 3C would continue current land use patterns. With a limit on growth to 50% of that associated with the Project and a limit on housing in particular, over the long term the City might have difficulty achieving future RHNA allocations for very-low-, low-, moderate-, and above-moderate-income housing. In addition, the City would fall below SCAG's



regional population growth projections and therefore would conflict with SCAG's *Regional Comprehensive Plan and Guide* (Final EIR, p. 220).

**Traffic/Transportation:** With Alternative 3C, the number of future vehicle trips within the City would decrease relative to the Project since development thresholds would be reduced by 50% and Gold Line light rail service east to Claremont would absorb trips. Fewer trips inbound and outbound trips in the same direction as the current predominant direction of travel (inbound in the morning and outbound in the afternoon) would result, as commuters and residents would opt to take the Gold Line to pass through Pasadena to Downtown Los Angeles. Thus, Alternative 3C would result in decreased congestion due to fewer trips in the peak direction of flow. A total of 32.4 lane-miles, or 5.8% of the citywide lane-miles, would operate at LOS E and F under Alternative 3C, compared to 49.8 lane-miles, or 8.9% of citywide lane miles, for the Project. Within the Central District, 1.3 lane-miles, or 1.4% of the lane-miles within the Central District, would operate at LOS E and F as a result of Alternative 3C, compared to 5.7 lane-miles (5.4% of lane-miles analyzed) for the Project (Final EIR, pp. 220-221).

**Population and Housing:** A 50% reduction citywide in development potential would result in reduced population growth relative to the Project since population is generated by new development. Alternative 3C would result in approximately 8,491 additional persons (based on 2.58 persons per household and 3,291 net new residential units), for a total population of 149,725 persons in 2015. The growth rate associated with Alternative 3C would be 0.5%, compared to 1.1% for the Project, and therefore below SCAG's regional population growth projection of 1.0% per year (Final EIR, p. 221).

**Noise:** Similar to the Project, Alternative 3C would have the potential to allow future residential development, under some conditions, to locate in areas where noise/land use conflicts cannot be fully mitigated. These areas are directly associated with proximity to the freeways. However, with only half the total amount of development permitted under Alternative 3C, fewer new residences potentially would be constructed in areas where noise/land use conflicts occur (Final EIR, p. 221).

**Air Quality:** Air quality is closely tied to traffic volumes. As a result of decreased vehicle trips and reduced delays at intersections throughout the planning area, air pollutant emissions would be expected to decrease relative to the Project (Final EIR, p. 222).

**Public Services and Recreation:** Alternative 3C would result in approximately 1,645 fewer new residents in Pasadena, and the demand for public services would be reduced under this alternative. However, with a future population of 149,725 persons and a required 449 acres of parkland, Pasadena would continue to exceed the standard of 3 acres of local parkland per 1,000 residents, as would occur with the project.

## **2. Project Objectives**

With Alternative 3C: 50% Growth and Extension of the Gold Line, the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan would be implemented. Alternative 3C would not achieve all Project objectives. The City would not fully promote economic vitality, as the City would limit the amount of development that would occur. Alternative 3C would not encourage the same level of new jobs, services, revenues, and other opportunities anticipated to result from implementation of the 2004 Land Use Element and Central District Specific Plan (Final EIR, p. 222).

### **3. Conclusion**

Although Alternative 3C: 50% Growth and Extension of the Gold Line would result in reduced traffic, noise, and air quality impacts, and reduced demand for public services, recreation, and utilities and service systems, the project would conflict with adopted regional plans and policies for the provision of low-income housing and accommodation of regional growth. In addition, Pasadena would have more difficulty meeting its RHNA for very-low-, low-, moderate-, and above-moderate- income housing, as fewer lower-income units might be developed. The City would not fully achieve its guiding principle of a "healthy family community," as only half of the projected residential units would be developed under Alternative 3C. The City rejects Alternative 3C as infeasible because the City of Pasadena does not have the jurisdictional authority to implement Alternative 3C, as the responsibility of extending the Gold Line belongs to the MTA (see *City of Del Mar*, *supra*, 133 Cal. App. 3d at 417; *Sequoiah Hills*, *supra*, 23 Cal. App. 4th at 715). Also, Alternative 3C does not meet basic project objectives as effectively as the Project.

### **D. ALTERNATIVES 4A, 4B, AND 4C: COMPLETION OF I-710**

This series of alternatives assumes that the I-710 freeway is completed between its current terminus in the City of Alhambra and the planned connection at I-210 in Pasadena. These alternatives also assume implementation of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan. The extension of the Gold Line light rail service to Claremont is not assumed under these alternatives.

While not likely to occur within the next 10 to 15 years for financial, environmental, and legal reasons, completion of the I-710 freeway utilizing a tunnel design represents the most recent alignment and design variation under review by regional agencies. In the analysis, the City recognizes that it does not have jurisdiction over completion of I-710; those responsibilities lie with the State of California Department of Transportation (Caltrans) and the Federal Highway Administration.

#### ***Alternative 4A: Proposed Project and Completion of I-710***

Alternative 4A: Proposed Project and Completion of I-710, like the Project, would not significantly impact aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology, and utilities and service systems, as these impacts are not identified as significant for the Project. Alternative 4A would result in the same level of development as the Project and would have the equivalent impacts with regard to land use and planning, population and housing, and public services and recreation.

### **1. Significant and Unavoidable Impacts**

**Traffic/Transportation:** Under Alternative 4A, the number of vehicle trips within the City would be expected to decrease with completion of I-710. There would be fewer trips on City streets inbound and outbound to and from Pasadena in the same direction as the current predominant direction of travel (inbound in the morning and outbound in the afternoon), as commuters and residents would opt to remain on the freeway to pass through Pasadena instead of taking major arterials and collectors to travel between I-210 and I-710. Thus, this alternative would reduce congestion on streets within Pasadena. The corridors that would improve by at least a full level of service include:

- Fair Oaks Avenue
- Arroyo Parkway
- Los Robles Avenue
- Sierra Madre Boulevard
- San Gabriel Avenue
- California Boulevard (west of Los Robles Avenue)

Other corridors that would improve by approximately one-half level of service include Marengo Avenue, Lake Avenue, Hill Avenue, and Allen Avenue.

About 34.1 lane-miles (approximately 6.1% of the citywide lane-miles) would operate at LOS E and F under Alternative 4A, compared to 8.9% as a result of the project. Within the Central District, 2.9 lane-miles (approximately 3.1% of the Central District lane-miles) would operate at LOS E and F as a result of Alternative 4A, compared to 5.4% for the project. The completion of the I-710 freeway would result in a 42% reduction in congestion in the Central District. Thus, this alternative would reduce congestion on streets within Pasadena (Final EIR, pp. 223-224).

**Noise:** Similar to the Project, Alternative 4A would have the potential to allow future residential development, under some conditions, to locate in areas where noise/land use conflicts cannot be fully mitigated. These areas are directly associated with proximity to the freeways (Final EIR, p. 224).

**Air Quality:** Air quality is closely tied to traffic volumes. As a result of decreased vehicle trips and reduced delays at intersections within Pasadena, localized air pollutant emissions impacts would be lower than those associated with the project (Final EIR, p. 224).

**Public Services and Recreation:** Alternative 4A would result in approximately the same amount of population growth as the Project, or 158,213 persons in 2015. Thus, the demand for public services would be the same, and Pasadena would continue to exceed the standard of 3 acres of local parkland per 1,000 residents, as would occur with the project (Final EIR, p. 224).

## 2. Project Objectives

Under Alternative 4A: Proposed Project and Completion of I-710, the provisions of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan would be included in their entirety. Alternative 4A would have the additional beneficial effect of reducing regional traffic on some Pasadena streets. Impacts associated with Alternative 4A, as well as the proposed Project, would not significantly impact cultural resources, geology and soils, hazards and hazardous materials, and hydrology. In addition, Alternative 4A would have reduced traffic and air quality impacts compared to the Project. Alternative 4A would also meet Mobility Element Policy 4.3 to "cooperate with regional agencies to promote area-wide solutions that are coordinated with other jurisdictions and transportation providers, and actively participate in regional and subregional planning initiatives, consistent with City-adopted plans and policies" (Final EIR, p. 225).

## 3. Conclusion

Completion of the I-710 freeway is unlikely by horizon year 2015 as a result of design constraints and environmental and legal issues. The County of Los Angeles Metropolitan Transportation Authority (MTA) recently proposed a study to assess the feasibility and costs of

tunneling the I-710 to avoid disruptive impacts to the communities of Pasadena and South Pasadena. This preliminary study is expected to start in late 2004 and will last at least 18 months. Therefore, the specific design of the I-710 is unknown, and completion is considered unlikely within the timeframe of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan. Although Alternative 4A would reduce some of the significant impacts of the project, completion of I-710 is not a realistic scenario within the project time frame. The City rejects the Alternative as infeasible because the City of Pasadena does not have the jurisdictional authority to implement Alternative 4A (see City of Del Mar, *supra*, 133 Cal. App. 3d at 417; Sequoia Hills, *supra*, 23 Cal. App. 4th at 715).

#### ***Alternative 4B: 75% Growth of the Proposed Project and Completion of I-710***

Alternative 4B: 75% Growth and Completion of I-710, like the Project, would not significantly impact aesthetics, cultural resources, geology and soils, hazards and hazardous materials, and hydrology, as these impacts are not identified as significant for the Project and thus would not be significant under Alternative 4B. Alternative 4B would result in 75% of the development associated with the Project. This alternative would have the equivalent impacts on land use and planning, noise, and public services and recreation as the proposed Project. Impacts with respect to population and housing and utilities and service systems would be lesser due to the reduced amount of development.

#### **1. Significant and Unavoidable Impacts**

**Traffic/Transportation:** As described for Alternative 4A, Alternative 4B would reduce congestion on streets within Pasadena. The corridors that would improve by at least a full level of service include:

- Fair Oaks Avenue
- Arroyo Parkway
- Los Robles Avenue
- Sierra Madre Boulevard
- San Gabriel Avenue
- California Boulevard (west of Los Robles Avenue)

Other corridors that would improve by approximately one-half level of service include Marengo, Lake, Hill, and Allen Avenues. Approximately 28.7 lane-miles (4.8% of the lane-miles citywide) would operate at LOS E and F under Alternative 4B, compared to 8.9% as a result of the project. 2.9 lane-miles (approximately 3.1% of the lane-miles within the Central District) would operate at LOS E and F as a result of Alternative 4B, compared to 5.4% for Alternative 4A (Final EIR, p. 225-226).

**Air Quality:** Air quality is closely tied to traffic volumes. As a result of decreased vehicle trips and reduced delays at intersections throughout the planning area, air pollutant emissions would be expected to decrease relative to the Project (Final EIR, p. 226).

**Public Services and Recreation:** Alternative 4B would result in approximately 1,645 fewer new residents in Pasadena, and the demand for public services would be reduced under this alternative. However, with a future population of 153,969 persons and a required 462 acres of parkland in the City, Pasadena would continue to exceed the standard of 3 acres of local parkland per 1,000 residents, as would occur with Alternative 4A (Final EIR, p.226).

## **2. Project Objectives**

Alternative 4B would implement the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan, although total development citywide would be 75% of that associated with the Project. Alternative 4B, like the Project, would not significantly impact aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology. Because the Alternative would result in 25% less overall development than the Project, Alternative 4B would result in slightly reduced traffic and air quality impacts and reduced demand for public services and recreation, and utilities and service systems. Alternative 4B would not achieve all of the objectives of the project (Final EIR, p. 227).

## **3. Conclusion**

Pasadena would not fully achieve its "healthy family community" objective, as fewer residential units would be developed with Alternative 4B. Pasadena might have more difficulty meeting its RHNA for very-low-, low-, moderate-, and above-moderate-income housing, as potentially fewer lower-income housing units citywide would be built relative to than could the Project. Furthermore, Pasadena would not fully promote economic vitality by limiting the amount of development that could occur. Alternative 4B would not encourage the same level of new jobs, services, revenues, and other opportunities associated with land use policy the 100% set forth in the 2004 Land Use Element. However, Alternative 4B would meet Mobility Element Policy 4.3 to "cooperate with regional agencies to promote area-wide solutions that are coordinated with other jurisdictions and transportation providers, and actively participate in regional and subregional planning initiatives, consistent with City-adopted plans and policies" (Final EIR, p. 227).

Nevertheless, completion of the I-710 Freeway is unlikely to occur by horizon year 2015 as a result of design constraints and environmental and legal issues. Although Alternative 4B would reduce some of the significant impacts of the project, completion of the I-710 would not avoid significant Project impacts and is not considered realistic within the project time frame. The City rejects Alternative 4B as infeasible because the City of Pasadena does not have the jurisdiction to implement Alternative 4B, as the responsibility of completing I-710 belongs to Caltrans and the Federal Highway Administration (see City of Del Mar, supra, 133 Cal. App. 3d at 417; Sequoia Hills, supra, 23 Cal. App. 4th at 715). Also, Alternative 4B does not meet basic project objectives as effectively as the Project.

### ***Alternative 4C: 50% Growth of the Proposed Project and Completion of I-710***

Alternative 4C: 50% Growth and Completion of I-710, like the Project, would not significantly impact aesthetics, cultural resources, geology and soils, hazards and hazardous materials, and hydrology, as these impacts are not identified as significant for the Project and thus would not be significant with Growth potential. Alternative 4C would result in 50% of the total development citywide relative to the Project. Impacts with respect to public services, recreation, and utilities and service systems would be reduced relative to the Project.

## **1. Significant and Unavoidable Impacts**

**Land Use and Planning:** Alternative 4C would result in approximately 3,291 net new residential units and 2,486,534 net new square feet of nonresidential development. Development pursuant to Alternative 4C would continue current land use patterns pursuant to the 2004 Land Use Diagram. The City would continue to experience a gradual, modest increase in housing units

and commercial development until the development thresholds were met. Housing production would be limited to 3,291 units. While the City would be able to meet its RHNA goal of 1,777 for the current (through 2006) planning period, the City may face difficulties in meeting future RHNA housing obligations for very-low-, low-, moderate-, and above-moderate income housing. This alternative might result in fewer lower-income units. In addition, the City would fall below SCAG's regional population growth projections (Final EIR, p. 227).

**Traffic/Transportation:** As described for Alternative 4A, Alternative 4C would reduce congestion on streets within Pasadena. The corridors that would improve by at least a full level of service include:

- Fair Oaks Avenue
- Arroyo Parkway
- Los Robles Avenue
- Sierra Madre Boulevard
- San Gabriel Avenue
- California Boulevard (west of Los Robles Avenue)

Other corridors that would improve by approximately one-half level of service include Marengo, Lake, Hill, and Allen Avenues. About 21.2 lane-miles (approximately 3.8% of the lane-miles citywide) would operate at LOS E and F under Alternative 4C, compared to 8.9% as a result of Alternative 4A. A total of 2.9 lane-miles (approximately 3.1% of the lane-miles within the Central District) would operate at LOS E and F as a result of Alternative 4C, compared to 5.4% for the Project (Final EIR, p. 228).

**Population and Housing:** A 50% reduction in development potential citywide would result in reduced population growth relative to the Project since population is generated by net new housing. Alternative 4C would result in approximately 8,491 additional persons (based on 2.58 persons per household and 3,291 net new residential units), yielding a population of 149,725 persons in 2015. The growth rate under Alternative 4C would be 0.5%, which would conflict with SCAG's regional population growth projection of 1.0% per year (Final EIR, p. 229).

**Noise:** Similar to the project, Alternative 4C would have the potential to allow future residential development, under some conditions, to locate in areas where noise/land use conflicts cannot be fully mitigated. These areas are directly associated with proximity to the freeways. However, with only half the total amount of development permitted relative to the project, Alternative 4C would result in fewer new residences constructed in areas where noise/land use conflicts occur (Final EIR, p. 229).

**Air Quality:** Air quality is closely tied to traffic volumes. As a result of decreased vehicle trips and reduced delays at intersections throughout the planning area, air pollutant emissions would be expected to decrease relative to the Project (Final EIR, p. 229).

**Public Services and Recreation:** Alternative 4C would result in approximately 1,645 fewer new residents in Pasadena, and the demand for public services would be reduced under this alternative. However, with a future population of 149,725 persons and a required 449 acres of parkland, Pasadena would continue to exceed the standard of 3 acres of local parkland per 1,000 residents, as would occur with the Project (Final EIR, p. 229).

## **2. Project Objectives**

Under Alternative 4C: 50% Growth and Completion of I-710, the 2004 Mobility Elements, Zoning Code Revisions, and Central District Specific Plan would be implemented. However, the 2004 Land Use Element would not be implemented. Due to a decrease in total development by 50%, Alternative 4C would result in reduced traffic, noise, and air quality impacts, and reduced demand for public services, recreation, and utilities and service systems. Alternative 4C would not achieve all of the project objectives (Final EIR, p. 229).

### **3. Conclusion**

Pasadena would not fully realize its "healthy family community" goals, as only half of the projected residential units could be developed under Alternative 4C. Alternative 4C would result in fewer housing units overall and fewer low-income housing units than could be provided by the 2004 Land Use Element, Zoning Code Revisions, and Central District Specific Plan. By restricting new development to half that anticipated by the project, the City would not meet the requirements of State housing law. Furthermore, Pasadena would not fully promote economic vitality by limiting the amount of development that could occur. The alternative would not encourage the same level of new jobs, services, revenues, and other opportunities associated with the 2004 Land Use Element. However, Alternative 4C would meet Mobility Element Policy 4.3 to "cooperate with regional agencies to promote area-wide solutions that are coordinated with other jurisdictions and transportation providers, and actively participate in regional and subregional planning initiatives, consistent with City-adopted plans and policies" (Final EIR, p. 230).

Nevertheless, completion of the I-710 Freeway is unlikely to occur by horizon year 2015 as a result of design constraints and environmental and legal issues. Although Alternative 4C would reduce some of the significant impacts of the project, completion of the I-710 is not considered realistic within the project time frame. The City rejects Alternative 4C as infeasible because the City of Pasadena does not have the jurisdiction to implement Alternative 4C, as the responsibility of completing I-710 belongs to Caltrans and the Federal Highway Administration (see *City of Del Mar*, *supra*, 133 Cal. App. 3d at 417; *Sequoia Hills*, *supra*, 23 Cal. App. 4th at 715). Also, Alternative 4C does not meet basic project objectives as effectively as the Project.

### **D. ALTERNATIVE 5: COMMERCIAL-ORIENTED DEVELOPMENT**

Alternative 5: Commercial-Oriented Development assumes that the focus of the 2004 Land Use Element, Zoning Code Revisions, and Central District Specific Plan would be on commercial development. Specifically, the 2,750 net new residential units anticipated by the 2004 Land Use Element and Central District Specific Plan to be developed within the Central District would not occur; instead, new development would consist entirely of commercial space, rather than a mix of housing and commercial development. Thus, the Commercial-Oriented Development Alternative assumes a freeze on housing development over the next 11 years within the Central District. The Commercial-Oriented Development Alternative assumes that the transportation policies and improvements described in the 2004 Mobility Element would be implemented. The extension of the Gold Line to Claremont and completion of the I-710 are not assumed in this alternative.

The Commercial-Oriented Development Alternative, like the Project, would not significantly impact cultural resources, geology and soils, hazards and hazardous materials, as these issues would be addressed adequately at the project-specific level. Also, hydrology impacts would be

less than significant, as all development within Pasadena is required to comply with applicable City, State, and federal regulations and standards.

## **1. Significant and Unavoidable Impacts**

**Land Use and Planning:** Development would continue to be focused around major transit centers such as Gold Line light rail stations and along major bus routes. New housing units, both market-rate and affordable, would not be located within the Central District. With a reduction in housing production potential by 2,750 units, all within the Central District, the City would not meet the Regional Housing Needs Assessment for very-low, low-, moderate-, and above-moderate income housing and thus would conflict with State housing law. In addition, the City would fall below SCAG's regional growth population growth projections. Pasadena would generate more jobs than the number of new housing units (Final EIR, p. 230).

**Transportation/Traffic:** The transportation improvements listed in the 2004 Mobility Element would be implemented; however, without mixed uses, this alternative might not encourage non-auto travel as people could not easily walk or take a local bus to and from work. Therefore, the number of vehicle trips would increase as a result of an emphasis on commercial land uses. Additional trips inbound and outbound to and from Pasadena would travel in the same direction as the current predominant direction of travel (inbound in the morning and outbound in the afternoon), as commercial and office development would attract people to Pasadena. Thus, this alternative would not only increase the total number of trips generated over time, it would also increase congestion by adding trips to the peak direction of flow. Tables 54 and 55 show the future total lane-miles projected peak-hour performance in 2015 associated with the Commercial-Oriented Alternative. A total of 62.7 lane-miles (approximately 11.2% of the lane-miles citywide) would operate at LOS E and F under the Commercial-Oriented Alternative, compared to 8.9% for the project. Eight lane-miles (approximately 8.6% of the Central District total lane-miles) would operate at LOS E and F under the Commercial-Oriented Development Alternative, compared to 5.4% for the project (Final EIR, pp. 230-231).

**Population and Housing:** Focusing new development on commercial uses would result in reduced population growth relative to the Project since population is generated by the number of housing units. The balance of jobs to housing units in the City would be skewed to more jobs than housing with the Commercial-Oriented Development Alternative (Final EIR, p. 231).

**Noise:** With reduced housing development, fewer residences would likely be built within those areas of Pasadena that are affected by conditionally unacceptable noise levels for residential uses (Final EIR, p. 232).

**Air Quality:** Air pollutant emissions are tied to traffic volumes. As a result of increased vehicle trips and increased delays at intersections throughout the planning area, air pollutant emissions would be expected to increase relative to the Project, and CO hot spots would be created at some intersections. More people would drive to work from outside of the area if new development were focused on commercial uses. Increased car use and traffic would release more air pollutant emissions and exacerbate the effect of carbon monoxide on sensitive receptors where hot spots are formed (Final EIR, p. 232).

## **2. Project Objectives**

The benefits of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan would be reduced under this alternative. Growth would still be targeted to



serve community need and enhance the quality of life. New development would be harmonized to preserve Pasadena's historic character and environment, and economic vitality would be promoted by increasing opportunities for jobs, services, and revenues. All of the provisions of the 2004 Mobility Element would be implemented under the Commercial-Oriented Development Alternative: (1) Promote a livable and economically strong community; encourage non-auto travel, (2) Protect neighborhoods by discouraging regional and sub-regional traffic not destined to Pasadena from passing through community neighborhoods, (3) manage multimodal corridors to promote, and (4) improve citywide transportation services. However, within the Central District, the City would not fully forward the objective of creating a place where people can live, work, shop, and play, as no new housing units would be constructed. The project objectives would not be met by this alternative (Final EIR, p. 227).

### **3. Conclusion**

Under Alternative 5, no additional housing would be provided within the Central District. Residents would have to travel from other parts of the City and the region to the Central District to take advantage of jobs and services that would be located within the Central District. The Central District would not provide a diversity of economic, residential, and cultural opportunities, as is a stated community desire. Pasadena would not meet its RHNA targets for very-low-, low-, moderate-, and above-moderate-income housing with a reduction of total housing units by 2,750 units. Thus, the Commercial-Oriented Development Alternative would conflict with adopted plans and policies for the provision of low-income housing and the accommodation of regional growth. The City rejects the Alternative because it does not meet most of the basic project objectives as effectively as the Project (see City of Del Mar, *supra*, 133 Cal. App. 3d at 417; Sequoiah Hills, *supra*, 23 Cal. App. 4th at 715.).

## **E. ALTERNATIVE 6: ALTERNATIVE FLOOR-AREA RATIO (FAR) ALLOCATION**

On February 24, 2004, the City Council directed City staff to incorporate as part of the project an increased floor-to-area ratio (FAR), or higher-density development, around the Gold Line Station at Del Mar and reduced FAR, or lower-density development, in the Historic Core of Old Pasadena. The City Council increased the maximum allowable FAR from 2.5 to 3.0 on two blocks adjacent to the Del Mar Gold Line Station. At the same time, the City made a corresponding reduction of FAR in the Historic Core of Old Pasadena from 2.5 to 2.0 FAR. In addition, height limits were increased in the same two blocks adjacent to the Gold Line station from 60 feet to 75 feet.

This alternative assumes that the maximum allowable FAR would be 2.5 on the two blocks adjacent to the Del Mar Gold Line Station and 2.5 FAR in the Historic Core of Old Pasadena. The land use changes resulting from the FAR and height changes under the Alternative FAR Allocation Alternative are as follows:

Old Pasadena:	Increase of 100 residential units Increase of 50,000 square feet of retail
Del Mar Station Area:	Reduction of 36 residential units Reduction of 72,000 square feet of retail

The Alternative FAR Allocation Alternative assumes that the provisions of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan would be implemented. The extension of the Gold Line light rail service to Claremont and completion of the I-710 Freeway are not assumed.

## **1. Significant and Unavoidable Impacts**

**Transportation/Traffic:** Trip generation analysis was performed for the traffic analysis zones affected by the change in land use intensity resulting for the FAR adjustments. The overall change in the number of trips generated in the area of the Del Mar Station and the Historic Core of Old Pasadena is very small. The differences are too small to be captured on the Pasadena Mobility Element computer model and, therefore, the City decided not to run the model to test this alternative. The effects of the small trip generation changes caused by the FAR adjustments in Old Pasadena and around the Del Mar Gold Line station would produce small changes, if any, in the number of lane-miles operating at or above capacity. The Alternative 6 results, on a lane-mile basis, would virtually match the proposed project.

A similar test was made of the key study intersections in the vicinity of the two areas where the land use changes were in this alternative. The increase of 145 peak hour trips in the Old Pasadena area would cause a slight increase in the volume/capacity ratio (resulting in a slight degradation of intersection operations) at the following intersections:

- Fair Oaks Avenue/Corson Street
- Fair Oaks Avenue/Maple Street
- Fair Oaks Avenue/Colorado Boulevard
- Marengo Avenue/Colorado Boulevard
- Marengo Avenue/Green Street

The reduction in peak-hour trips in the vicinity of the Del Mar Gold Line station would slightly improve intersection operations at the following intersections:

- Pasadena Avenue/California Boulevard
- Arroyo Parkway/Del Mar Boulevard
- Arroyo Parkway/California Boulevard
- Marengo Avenue/Union Street

In all of the intersections listed above the differences are slight. The increases or the decreases in volume/capacity ratio are less than 0.01 (or less than 1% of the capacity of the intersection). Therefore, the intersection operational changes resulting from the modifications to the FAR limits in both Old Pasadena and Del Mar station would not have any significant impacts on any of the study intersections. The transportation system performance under the Alternative FAR Allocation Alternative would be virtually the same as predicted under the Future with Project conditions (Final EIR, pp. 232-234).

## **2. Project Objectives**

The Alternative FAR Allocation, like the Project, would not affect aesthetics, cultural resources, geology and soils, hazards and hazardous materials, and hydrology, as only minor land use changes would result. The Alternative FAR Allocation would result in virtually the same amount of development and thus would have equivalent impacts on land use and planning, population and housing, public services, and utilities and service systems as the Project. However, this

alternative would not concentrate as much development around the Del Mar light rail station. The Alternative FAR Allocation would still implement the provisions of 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan with the exception of achieving the full potential of the City's transit-oriented development goals and policies with respect to the light rail stations (Final EIR, P. 235).

### **3. Conclusion**

Under Alternative 6, housing surrounding the Del Mar light rail station would be decreased and Pasadena would not fully achieve its transportation oriented development goals, which involves increasing density within a quarter mile of the Gold Line light rail stations. Therefore, this alternative does not meet the City objectives of promoting transit-oriented development within the Central District. The City rejects the Alternative because it does not meet most of the basic project objectives as effectively as the Project (see City of Del Mar, *supra*, 133 Cal. App. 3d at 417; Sequoia Hills, *supra*, 23 Cal. App. 4th at 715).

## **F. ALTERNATIVE 7: PHYSICAL IMPROVEMENTS TO IMPROVE TRAFFIC FLOW**

The 2004 Mobility Element includes policies that discourage the physical widening of any extended roadway corridor in the City. However, the Element does permit the selective widening of intersections to remove congestion bottlenecks at intersections. This alternative investigates key study intersections to identify physical improvements that could be employed to eliminate anticipated congestion at those intersections projected to operate at LOS E or F.

The 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan would be implemented under Alternative 7. The following analysis examines both the project and the 50% growth scenario and assumes that the Gold Line light rail service would be extended to Claremont. The completion of the I-710 Freeway is not assumed.

Alternative 7, under both the project and 50% growth conditions, could involve the removal of buildings to achieve intersection improvements and thus, at selected locations, could result in aesthetic, cultural resource, geology and soils, hazards and hazardous materials, hydrology, population and housing, and utility system impacts. Each of these would need to be investigated and mitigated at the project-specific level.

### **1. Significant and Unavoidable Impacts**

**Transportation/Traffic:** As a result of the Project and the Alternatives examined in the Final EIR, two intersections of the 18 intersections studied are expected to exceed their capacity and operate at LOS F: Arroyo Parkway/California and Rosemead/Foothill. An additional seven are anticipated to operate at LOS E, for a total of nine congested intersections resulting from long-term implementation of the Project. When the Gold Line Extension is added to project conditions, as is assumed with Alternative 3A: Proposed Project and Extension of the Gold Line, the number of intersections projected to operate at LOS E and F is reduced to six.

A series of intersection tests was conducted to investigate the most optimistic performance of the system in the future. Alternative 2B: 50% Growth Alternative was selected, as this

alternative does allow some level of growth.<sup>6</sup> With all of the 2004 Mobility Element transportation policies and improvements in place but only 50% of total growth (relative to the Project), Alternative 2B would reduce the number of intersections operating at LOS E and F from nine with the Project to seven. If the Gold Line Extension were added to Alternative 2B, the number of intersections operating at LOS E and F would be reduced to four.

While Alternative 2B would reduce the number of impacted intersections, the alternative may not be feasible over the long term, given that State law requires Pasadena to accept its fair share of new housing that must be added to the region to accommodate the projected population growth and meet the Regional Housing Needs Assessment for very-low-, low-, moderate-, and above-moderate- income housing.

Possible mitigation at those intersections operating at LOS E or F under Alternative 3A: Proposed Project and Extension of the Gold Line was analyzed in the EIR. Six intersections are projected to operate at LOS E or F before mitigation. Implementation of physical mitigation (physical intersection improvements to include widening) would improve all intersections operating at LOS F. Only the intersection of Arroyo Parkway/California would operate at LOS E, and all others would operate at LOS D or better (Final EIR, pp. 235-238). The proposed intersection improvements are:

- **Arroyo Parkway/Del Mar Boulevard:** Add a second left-turn lane to the eastbound approach. This improvement would require additional right-of-way on the eastbound approach.
- **Arroyo Parkway/California Boulevard:** Add a second left turn lane to the westbound approach to accommodate traffic destined for the Pasadena Freeway. Add a northbound right-turn lane to the intersection (requires additional right-of-way)
- **Lake Avenue/Maple Boulevard:** Restripe Maple to provide three through lanes from Lake to Los Robles and widen within the existing right-of-way to provide the additional lane and retain the bike lane.
- **Rosemead Boulevard/Foothill Boulevard:** Add a second left-turn lane on all four approaches (requires additional right-of-way and may not be feasible until buildings in some of the quadrants of the intersection redevelop).
- **Del Mar Boulevard/Hill Boulevard:** Add a second left-turn lane on the eastbound approach to accommodate the traffic that is headed for the I-210 freeway (requires additional right-of-way on the eastbound approach).
- **Sierra Madre Villa/Foothill:** Add a second left-turn lane on the northbound, eastbound, and westbound approach (requires additional right-of-way).

As discussed in Section IX, subsection F of these Findings, the City has incorporated these improvements into the Mobility Element to reduce project impacts.

**Noise:** As Alternative 7 assumes the same land use patterns as the Project, Alternative 7 would have the potential to allow future residential development, under some conditions, to locate in

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<sup>6</sup> The City did not test a no-growth alternative, as such is not considered realistic and is contrary to regional growth plans and City policy to allow for focused growth to accommodate future needs.

areas where noise/land use conflicts cannot be fully mitigated. These areas are directly associated with proximity to the freeways (Final EIR, p. 238).

**Air Quality:** Air quality is closely tied to traffic volumes. As a result of reduced delays at intersections located throughout the planning area, air pollutant emissions would be expected to be improved compared to the Project (Final EIR, p. 238).

## **2. Project Objectives**

With Alternative 7, the growth projections of the 2004 Land Use Element would be implemented, and new development would be targeted in those areas most appropriate to support new residential and nonresidential uses. Development pursuant to Alternative 7 would occur as outlined in the 2004 Land Use Element, Zoning Code Revisions, and Central District Specific Plan. Alternative 7 would achieve the objectives of the Mobility Element, which does permit the selective widening of intersections to remove congestion bottlenecks at intersections. (Final EIR, p. 241).

## **3. Conclusion**

Impacts associated with Alternative 7: Physical Improvements to Improve Traffic Flow could result in limited, location-specific impacts with regard to aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology, housing, and utilities. Such impacts would need to be implemented at those intersection locations where they might occur. Alternative 7 would result in the same amount of development as the project and therefore would have the same impacts on land use and planning, noise, public services and recreation, and utilities and service systems. The alternative would reduce traffic and air quality impacts relative to the project. The intersection improvements are not contrary to City policy. Therefore, the City has incorporated the described intersection improvements and policies supporting extension of the Gold Line into the Mobility Element.

## **G. ALTERNATIVE 8: RESIDENTIAL-ORIENTED DEVELOPMENT**

Alternative 8: Residential-Oriented Development assumes that the focus of the 2004 Land Use Element, Zoning Code Revisions, and Central District Specific Plan would be on residential development within the Central District. Specifically, the number of residential units allowed would increase by 1,759, for a total of 4,509 units. Future commercial development within the Central District would not be permitted through horizon year 2015. The Residential-Oriented Development Alternative assumes that the transportation policies and improvements described in the 2004 Mobility Element would be implemented. The extension of the Gold Line to Claremont and completion of the I-710 are not assumed in this alternative.

The Residential-Oriented Development Alternative, like the Project, would not significantly impact cultural resources, geology and soils, hazards and hazardous materials, as these issues would be addressed adequately at the project-specific level. Also, hydrology impacts would be less than significant, as all development within Pasadena is required to comply with applicable City, State, and federal regulations and standards.

## **1. Significant and Unavoidable Impacts**

**Land Use and Planning:** Development would continue to be focused around major transit centers, such as the Gold Line light rail stations, and along major bus routes. New nonresidential development would not be permitted within the Central District. A reduction in commercial development potential of 1.25 million square feet would result. As this Alternative allows additional housing development, the City would be able to meet the Regional Housing Needs Assessment for very-low-, low-, moderate-, and above-moderate-income housing and thus would not conflict with State housing law. However, the City would exceed SCAG's regional growth population projections. Pasadena would generate more housing units than new jobs (Final EIR, pp. 241-242).

**Transportation/Traffic:** The transportation improvements listed in the 2004 Mobility Element would be implemented. Kaku Associates conducted a traffic analysis for this alternative assuming an additional 1,759 residential units and 1.25 million less square feet of new nonresidential development, relative to the proposed project. The addition of 1,759 units and the reduction of 1.25 million square feet of nonresidential development would result in the attraction of more trips into the Central District during the afternoon peak hour and a reduction in outbound trips. Tables 58 and 59 show the projected future lane-miles peak-hour performance in 2015 associated with the Residential-Oriented Alternative. With more people living in close proximity to the Gold Line light rail stations, the total number of trips generated within the Central District would be reduced by 584 afternoon peak-hour trips. More important than the reduction in total trips is the change in directionality of the trips associated with this alternative. Inbound and outbound trips would be split almost evenly. A total of 49.8 lane-miles (approximately 8.9% of the lane-miles citywide) would operate at LOS E and F under the Residential-Oriented Alternative, the same as for the project. Of the 6.3 lane-miles of that would experience improved street performance relative to the project, 1.6 would be located within the Central District and 4.7 would occur on the City's street system outside of the Central District. As shown in Table 59, 43.7 lane-miles (approximately 7.8% of the citywide total lane-miles) would operate at LOS E and F under the Residential-Oriented Development Alternative, compared to 8.9% for the project. When compared to the performance of the other alternatives tested, the Residential-Oriented Alternative is comparable to the 75% of Growth of the Proposed Project Alternative. Thus, the change of land use to add more residential units and freeze the level of new nonresidential development would have the same effect on the transportation system as reducing overall citywide growth to 75% of that associated with the proposed project.

Persons commenting on the Draft EIR and the various project components expressed some concern that the addition of more residential units to the Central District would result in too much residential development such that the residents could not be served by existing commercial businesses within the Central District. The balance in trip generation indicates that the amount of existing commercial development (primarily retail and employment opportunities) in the Central District would be sufficient to serve even the increased residential levels tested in this alternative (Final EIR, pp. 242-244).

**Noise:** With increased housing development, more residences would likely be built within those areas of Pasadena that are affected by conditionally unacceptable noise levels for residential uses (Final EIR, p. 243).

**Air Quality:** Air pollutant emissions are tied to traffic volumes. As a result of decreased vehicle trips compared to the Project and reduced delays at intersections throughout the planning area, air pollutant emissions would be expected to decrease. Decreased vehicle trips would release fewer air pollutant emissions than the Project (Final EIR, p. 243).

**Public Services and Recreation:** The Residential-Oriented Alternative would result in increased population growth within Pasadena relative to the Project. The ratio of park land per 1,000 residents would decrease with a larger citywide population and would thereby move the City farther from compliance with its park provision goals (Final EIR, p. 243).

## **2. Project Objectives**

The benefits of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan would be reduced under this alternative. Growth would still be targeted to serve community need and enhance the quality of life. New development would be harmonized to preserve Pasadena's historic character and environment. However, without new commercial development within the Central District, the City would not promote economic vitality, as fewer opportunities for jobs, services, and revenues would result. All of the provisions of the 2004 Mobility Element would be implemented under the Commercial-Oriented Development Alternative: (1) Promote a livable and economically strong community; encourage non-auto travel, (2) Protect neighborhoods by discouraging regional and sub-regional traffic not destined to Pasadena from passing through community neighborhoods, (3) manage multimodal corridors to promote, and (4) improve citywide transportation services. However, within the Central District, the City would not fully forward the objective of creating a place where people can live, work, shop, and play, as no new commercial development would be constructed. The project objectives would not be met by this alternative (Final EIR, p. 244).

## **3. Conclusion**

The Central District of the City would not fully forward the objective of creating a place where people can live, work, shop, and play, as no new nonresidential development would result. Under the Commercial-Oriented Alternative, the Central District would not further experience increased diversity of uses. No additional nonresidential development would be provided within the Central District. Residents within the Central District potentially would have to travel to other parts of the City and the region for employment opportunities. The Central District would not provide an increasing diversity of economic, residential, and cultural opportunities, as is a stated community desire. The City rejects the Alternative because it does not meet most of the basic project objectives as effectively as the Project (see City of Del Mar, *supra*, 133 Cal. App. 3d at 417; Sequoiah Hills, *supra*, 23 Cal. App. 4th at 715).