

Demolition of Storefronts: The Project would demolish the historic 1926 multi-storefront building and the parking garage to allow for new construction on the site. Both buildings are related to the Constance Hotel and date from the Hotel's period of significance. The demolition of these buildings would alter the hotel's historic setting. (EIR, p. IV.C-28.) Demolition of the parking garage would also obscure the fact that the original design included accommodation of automobiles. The demolition of the portion of the 1926 storefront building that contains the hotel's original dining room would remove a significant character-defining space that remained in use as the hotel's dining room until its recent adaptive reuse for a retail tenant. The exterior of the 1926 multi-storefront building is substantially intact below later additions, though its interiors other than the original dining room have sustained significant alterations and do not retain historic integrity. (Ibid.) The Constance Hotel tower and courtyard would not continue to be eligible for listing in the National Register of Historic Places and convey their historic associations with the demolition of this related building. Therefore, demolition of the 1926 multi-storefront building would result in a significant adverse effect to historic resources on the site. (Ibid.)

Proposed New Construction: The design of the addition to the hotel tower and adjacent new construction would have the potential to disrupt or distract from the historic character of the complex. As planned, all new construction would be designed as separate elements that potentially could be removed in the future, with minimal impact to the Constance Hotel tower. (EIR, p. IV.C-28.) Because the Constance Hotel

tower has been the tallest building on the block to date, the prominent vertical massing of new construction would alter the hotel tower's historic setting. However, the taller volumes of the new construction would be set back from Colorado Boulevard towards the southwestern corner of the site, leaving substantial space between the original hotel tower and the newly constructed tower. Vistas and view corridors to and from the Constance Hotel tower from along Colorado Boulevard, would be maintained and the hotel tower's Mentor Avenue elevation would remain unchanged. Therefore, the alteration of the hotel tower's setting through construction of a new mixed-use tower, and the location, scale, and massing of new construction would not result in a significant adverse affect to historic resources on the site. (Id. at pp. IV.C-29 to 30.) The Project as proposed would not meet all of the Secretary of the Interiors Standards without mitigation. Without mitigation to protect more of the hotel's historic character, the project would not meet Standard 2. (EIR, pp. IV.C-30 to 31.) Without mitigation to preserve more distinctive examples of craftsmanship, the proposed project would not conform to Standard 5. (Id. at p. IV.C-31.) Demolition of the multi-storefront retail building does not meet Standard No. 6. (Id. at p. IV.C-32.) The Project would conform to Standard 8 if archaeological resources are protected and preserved in place. If any resources are to be disturbed, mitigation measures must be undertaken. (Id. at p. IV.C-32.) Impacts to adjacent structures will not be significant. (Id. at pp. IV.C-33 to 34.)

With implementation of the mitigation measures listed above, the Project would result in adverse affects to the Constance Hotel property (specifically, the related

Colorado Boulevard storefronts) such that it will no longer convey its historic significance. Implementation of the mitigation measures would not reduce impacts to historic resources to a less-than-significant level and the Constance Hotel would likely not continue to remain eligible for the California Register of Historical Resources and the National Register of Historic Places. Consequently, the Project as currently proposed would have a significant and unmitigated impact to historical resources, even with preservation of the former Constance hotel tower and related elements including the hotel courtyard. (Id. at p. IV.C-36.)

Subsequent review by the City of Pasadena Design Commission during the approval process is required. As has always been the case under the Zoning Code (PMC § 17.61.030), certification of the EIR is a finding that the Project as designed to date may have the impacts disclosed in the EIR, and the mitigation measures set forth therein are imposed to reduce those potential impacts. Review by the Design Commission is not a mitigation measure. Rather, review by the Design Commission is a subsequent discretionary action whose scope is governed by the Zoning Code, and which will require review under CEQA. The Design Commission has the authority to require changes to the future design so that the final design does not give rise to new and different potentially significant impacts that were not analyzed in the EIR.

Cumulative Impacts

No significant impacts to adjacent resources as a result of the Project have been identified. No related projects are located immediately adjacent to the Project which

could compound the effects of the Project on on- or off-site resources. Significant cumulative impacts to historical resources would not occur as a result of the Project. (EIR, p. IV.C-36.)

c. TRANSPORTATION AND CIRCULATION

i. Potential Significant Impacts

- The Project has the potential to significantly impact nearby intersections. The impacts vary during different phases of the Project. (EIR, pp. IV.E-15 to 17.)
- If the Project does not provide sufficient parking, a significant impact could occur. (EIR, p. IV.E-16.)
- The increase in traffic from the Project has the potential to significantly impact surrounding street segments. (EIR, p. IV.E-15.)
- Regional impacts of the Project could rise to a level of significance at Congestion Management Program monitoring locations, and thereby impact regional transit systems. (EIR, p. IV.E-16.)

ii. Proposed Mitigation

All phases of the project are subject to the City's Transportation Demand Management (TDM)/Trip Reduction Ordinance (TRO) requirements. A TDM plan shall be completed to address the Project's programs to promote alternative modes of transportation prior to the issuance of the first permit for construction per phase (foundation, demolition, grading, or building) and shall meet the following requirements:

1. Carpool and Vanpool Parking. A minimum of 10% of the employee parking spaces shall be reserved for and designated as preferential parking for carpool and vanpool vehicles. Such parking area shall be in a location more convenient to the place of employment than parking spaces for single occupant vehicles, and shall be located as close as practical to the employees' entrances.
2. Bicycle Parking. Bicycle parking shall be provided on-site in compliance with Section 17.46.320 (Bicycle Parking Standards). In addition, the bicycle parking shall be located near the employee entrance and shall be conveniently accessible from the external circulation system.
3. Transportation Demand Management Program Plan. A Transportation Demand Management Program ("TDM") Plan shall be submitted which complies with Chapter 10.64 of the Municipal Code (Transportation Management Program). The owner/ developer shall place a deposit with

the Department of Transportation prior to the issuance of the first permit for construction (foundation, demolition, grading, or building) per phase. This deposit is subject to a partial refund or additional billing in the event that the deposit amount is 'not sufficient to cover the cost of the review. The developer shall pay an annual Transportation Demand Management (TDM) status report review fee in compliance with the requirements of the Trip Reduction Ordinance.

IV.E-1 The proposed project shall contribute funds to the Neighborhood Traffic Management Capital Improvement Program Fund Number 75210. The funds will be used to implement traffic management measures to protect neighborhoods potentially influenced by the project's traffic. This mitigation measure is in line with the objectives of the street segment thresholds to protect residential neighborhoods from intrusion of traffic intended to and from commercial projects. Section 4.1.3.1 of the Mobility Element of the General Plan states: "The Council established, as City policy, that traffic growth would be limited on selected streets in order to protect residential neighborhoods."

IV.E-2 All of the sidewalks, crosswalks and travel lanes along Mentor Avenue and Colorado Boulevard shall be made available such that pedestrian and vehicular access and circulation within and in the vicinity of the project site would be maintained at all times during Phase 1 construction activities.

IV.E-3 The functional adequacy of the valet operations on-site shall be demonstrated to the Pasadena Department of Transportation at the time of final design and permits for the Phase 1 component of the proposed project to ensure there will be no conflicts with on-site services. Continued operational adequacy of the valet operations during Phase 2 construction shall also be demonstrated to Pasadena DOT.

IV.E-4 A formal recorded parking agreement between the applicant and the off-site parking provider shall be submitted to the City's Planning Department and Department of Transportation prior to the issuance of the first permit for construction (foundation, demolition, grading, or building). The parking agreement shall indicate the number of parking spaces to be leased to the applicant, and any time constraints to access those parking spaces, if any.

IV.E-5 A final construction traffic management plan shall be prepared for each phase of the proposed project. This Plan would address haul routes, dust control, noise control and City regulations. The construction management plan ensures that the construction activities and workers follow the City regulations and provides details of activities planned on-site will be prepared at the time of final design, prior to commencement of construction. The Construction Management Plan will address various issues and details such as number of construction trips, haul routes and delivery management, relocation of the bus stop along Lake Avenue and associated coordination with the local transit operators, appropriate signage, temporary relocation/closing sidewalks along Lake Avenue, Colorado Boulevard and Mentor Avenue and other site-specific changes during construction.

IV.E-6 Construction truck traffic shall be restricted to the hours of 9:00 AM to 3:00 PM, which is outside of the typical peak hour period of traffic, unless as otherwise stipulated by Mitigation Measure IV.E-5.

IV.E-7 Construction staging shall not block any lanes of traffic along the project frontage of Lake Avenue, Colorado Boulevard and Mentor Avenue.

IV.E-8 Construction workers shall be restricted from parking on-street. Construction workers should be transported to the project site using shuttles (bus or van).

IV.E-9 The configuration of the Mentor Avenue driveway shall be coordinated with the City of Pasadena DOT before Final design approval. Specifically, the Mentor Avenue driveway shall be designed to provide unimpeded vehicular access at all times. At a minimum, DOT recommends three unrestricted lanes to serve vehicular traffic to and from Mentor Avenue. Appropriate overhead signage and striping shall be installed to reduce on-site driver confusion and decision-making.

IV.E-10 The functional adequacy of the loading spaces shall be demonstrated to the satisfaction of the Pasadena Department of Transportation at the time of final design and permits for Phase 2 conditions to ensure there will be no conflicts with on-site services.

IV.E-11 Lake Avenue/Walnut Street – The proposed project shall compensate for the acquisition of a shuttle bus as well as for the operations and maintenance (O&M) costs for the new shuttle bus service to be operated along Lake Avenue and/or the Walnut Street travel corridors at minimum for the first three years. The final route selection would be determined by the transit shuttle operator. Additionally, the unsubsidized portion of the O & M costs for this shuttle service for an additional seven years shall be considered. This Project transit improvement will recognize, consider, and build upon the recommendations from Pasadena ARTS Bus or any other bus operator for implementation of this improvement.

IV.E-12 Transit Incentives – The proposed project shall provide subsidized transit passes at specific locations, conveniently located on-site. All eligible employees, residents and hotel guests shall be offered discounted daily or monthly transit passes giving them access to all transit services operating in the area.

IV.E-13 For the bus zone at the southeast corner of the Lake Avenue/ Colorado Boulevard intersection, the following conditions shall apply:

- The applicant shall provide funds for a new bench, solar trash container, and bus stop signage;
- Bus zone shall be a minimum of 130 feet wide at this very heavily used transit stop location.
- No new trees shall be located within the bus zone to prevent interference with ADA guidelines, boarding/alighting, and other pedestrian accessibility.
- The existing bus shelter shall be retained in the zone at all times.

- Existing transit operations of the transit stop shall be maintained during and after construction at all times.

IV.E-14 The driveway designs, valet service area and operations and loading area functionality shall be coordinated with the City of Pasadena DOT at the time of final design.

IV.E-15 Truck and vehicular turn templates should be laid out on the site plan once design details have been worked out to ensure that on-site congestion is minimized to the satisfaction of Pasadena DOT at the time of final design approval.

iii. Findings Pursuant to CEQA Guidelines Section 15091

Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible mitigation measures or Project alternatives identified in the Final EIR.

iv. Supporting Explanation

The EIR includes an extensive and adequate traffic study, broken down by each of the three phases of the Project, and mitigation measures imposed by phase. The traffic study also fully and adequately analyzed the impacts of each of the alternatives studied in the EIR.

Intersection Impacts: Phase I of the Project would result in a net total of approximately 1,273 daily trips of which 84 additional trips (49 inbound, 35 outbound) would occur during the morning peak hour and 101 additional trips (53 inbound, 48 outbound) during the evening peak hour. The proposed parking structure will not be

available until Phase II is completed, so the hotel will provide valet service to the 2 N. Lake Avenue parking structure. All of the Phase I valet trips, not including pass-by trips, were assigned to and from 2 N. Lake Avenue. Traffic generated by the Phase I of the Project would not cause a significant impact at any of the 15 study intersections. (EIR, pp. IV.E-18 to 24.) Phases I and II of the Project were combined to reflect Phase II conditions. Phase II conditions would have a total net trip generation of 1,354 daily trips of which 98 trips (57 inbound, 41 outbound) would occur during the morning peak hour and 108 trips (56 inbound, 52 outbound) during the evening peak hour. There would be no valet trips in Phase 2 conditions. None of the analyzed intersections would be significantly impacted by the combined traffic effects of Phases II and II. (EIR, pp. IV.E-24 to 28.) The overall Project (Phases I, II and III combined) defined as Project Phase III conditions, would have a total net trip generation of 4,914 daily trips of which 289 trips (210 inbound, 79 outbound) would occur during the morning peak hour and 488 trips (225 inbound, 263 outbound) during the evening peak hour. It was assumed that 75 percent of these trips (755 daily, 75 AM and PM trips) would be valet and the remaining 25 percent (252 daily, 25 AM and PM trips) would be self-parked trips. The overall resulting on-site Project trip generation would be 4,662 daily trips of which 264 trips would occur during the morning peak hour and 463 trips would occur during the evening peak hour. The Project's trip generation from the valet and self-park trips to 2 N. Lake Avenue would result in 1,007 daily trips of which 100 trips would occur during the morning and evening peak hours. The intersection of Lake Avenue/Walnut Street

would be significantly impacted during the evening peak hour by the combined traffic effects of the overall Project at completion. (EIR, pp. IV.E-28 to 33.) With imposition of Mitigation Measures IV.E-11 and IV.E-12, the Project's impacts are reduced to below a level of significance. The addition of a shuttle bus would increase transit capacity along the Lake Avenue and/or Walnut Street travel corridors as well as along other areas in the Project vicinity. This would reduce the number of vehicular trips in the corridor served by the additional bus, and would improve operations at many intersections along the selected route including the impacted intersection of Lake Avenue and Walnut Street. The addition of the bus along the Lake Avenue corridor would also improve transit network connectivity by offering improved/enhanced access to the Metro Gold Line Station at the Lake Avenue/I-210 interchange. (EIR, p. IV.E-62.)

Roadway Segment Impacts: Twelve roadway segment locations were identified for analysis, and the traffic study analyzed segment impacts for each phase of the Project. The City has adopted a local sliding scale of significance for segment impacts. (EIR, p. IV.E-16.) During Phase I, two street segments (Mentor Avenue between Union Street and Colorado Boulevard, and Mentor Avenue between Green Street and Cordova Street) have an increase in average daily trips greater than the City's highest segment significance threshold of 7.4% where mitigation may not be feasible. This increase is mostly attributable to the valet trips to/from the Project site and the offsite parking structure at 2 N. Lake Avenue. Significant impacts will remain at this location. Mentor Avenue between Walnut and Union is also impacted, but at the City's lowest

threshold, where mitigation is feasible. (EIR, pp. IV.E-33 to 35.) During Phase II, the impacts along these segments of Mentor Avenue decrease because there is no off-site valet service during Phase II, but they remain significant and unmitigable along the Mentor segment between Green Street and Cordova Street. The segment of Catalina Avenue between Union Street and Colorado Boulevard is also impacted during Phase II at the City's lowest threshold, where mitigation is feasible. (Id. at pp. IV.E-35 to 36.) Due to the overall Project (Phase III conditions), the following three analyzed street segments are impacted greater than the significance threshold of 7.4%: (1) Mentor Avenue between Walnut Street and Union Street; (2) Mentor Avenue between Union Street and Colorado Boulevard; and (3) Mentor Avenue between Green Street and Cordova Street. The following segments are significantly impacted but mitigable during Phase III: (1) Catalina Avenue between Union Street and Colorado Boulevard; (2) Mentor Avenue between Cordova Street and Del Mar Boulevard; (3) El Molino Avenue between Walnut Street and Union Street; and (4) El Molino Avenue between Union Street and Colorado Boulevard. (Id. at pp. IV.E-37 to 38.) As required by Mitigation Measure IV.E-1, the Project will contribute funds to the Neighborhood Traffic Management Capital Improvement Program Fund to implement traffic management measures to protect neighborhoods potentially influenced by the Project's traffic. This mitigation measure is in line with the objectives of the street segment thresholds to protect residential neighborhoods from intrusion of traffic intended to and from

commercial projects. However, even with mitigation, significant impacts to these street segments would remain. (EIR, p. IV.E-57.)

Congestion Management Program (Transit) Impacts: The nearest Congestion Management Program (CMP) arterial monitoring intersection to the Project site is the intersection of Arroyo Parkway and California Boulevard. The overall Project is not expected to add 50 or more new trips per hour to this location. Therefore, no further analysis of CMP arterial monitoring intersections is required. The nearest mainline freeway monitoring locations to the Project site are the I-210 Freeway west of SR-134 and I-210 at Rosemead Boulevard. The overall Project will not add 150 or more new trips per hour to these locations in either direction. Therefore, no further analysis of CMP freeway monitoring stations is required. (EIR, pp. IV.E-37 to 38.) With regard to transit, there would be capacity available on a daily basis, both on the existing bus and train lines, serving the study area to accommodate Project transit trips. Further, the existing transit system supply as well as the shuttle bus required by Mitigation Measure IV.E-11 would accommodate the Project's anticipated transit demands. (EIR, pp. IV.E-38 to 40.)

Site Access and Circulation Impacts: During Phases I and II, there would be no changes to any of the existing driveways along Lake Avenue and Colorado Boulevard. The configuration of the Mentor Avenue driveways will be altered to provide a two lane driveway at the northern driveway on Mentor Avenue, and the southern driveway would continue to provide one outbound lane and three existing ATM drive aisles. An area for

valet pick-up and drop-off would be located on-site until Phase II is built. As required by Mitigation Measure IV.E-3, the functional adequacy of the valet operations on-site shall be demonstrated to the Pasadena Department of Transportation at the time of final design and permits for Phase I to ensure there will be no conflicts with on-site services, and continued operational adequacy of the valet operations during Phase II construction shall also be demonstrated to Pasadena DOT. (EIR, p. IV.E-41.) With the completion of Phase II, the northern driveway on Mentor Avenue would be removed, leaving a single driveway on Mentor Avenue, and one existing ATM aisle would be removed. All of the driveways would provide access to the partially completed subterranean parking garage through a single ramp located adjacent to the loading area. Phase II would also provide eight loading spaces that can be accessed from any of the driveways. As required by Mitigation Measure IV.E-10, the functional adequacy of these loading spaces shall be demonstrated to the satisfaction of Pasadena Department of Transportation at the time of final design and permits for Phase 2 conditions to ensure there will be no conflicts with on-site services. Additionally, Mitigation Measure IV.E-9 requires that the driveway design be coordinated with the City of Pasadena DOT at the time of final design of Phase II. (Ibid.) During the construction of Phase III, the driveways on Lake Avenue and Colorado Boulevard would be available to construction vehicles only (unless otherwise stipulated by the Construction Management Plan per Mitigation Measure IV.E-5). The Mentor Avenue driveway would provide access to the Phase I and II components of the Project. All Phase II cumulative traffic would access

the site from the Mentor Avenue driveway only. (Id. at p. IV.E-43.) Upon completion of Phase III, the Project would have two driveways serving the site - one on Mentor Avenue and another on Lake Avenue. The existing driveway on Colorado Boulevard would be removed. Both driveways would provide access to the surface parking lot, subterranean parking garage and all loading spaces. A 28-foot wide two lane east-west drive aisle would provide on-site access and circulation to the surface parking lot driveway and the ramp accessing the subterranean parking garage. Mitigation Measure IV.E-14 requires that the driveway designs, valet service area and operations and loading area functionality shall be coordinated with the City of Pasadena DOT at the time of final design, and Mitigation Measure IV.E-15 ensures truck and vehicular turn templates are laid out after design details have been worked out. With these mitigation measures, impacts are less than significant. (EIR, pp. IV.E-43 to 44.)

Pedestrian Access and Circulation Impacts: The pedestrian elements, cross-walk and sidewalks, under Project are not anticipated to change compared to existing conditions. The Project would maintain the 12-foot to 14-foot sidewalk on Lake Avenue along the project frontage and a 15-foot sidewalk along Colorado Boulevard on the south side adjacent to the Project. Adequate pedestrian infrastructure would continue to be available in the vicinity of the Project. Numerous pedestrian access and circulation possibilities similar to existing conditions will continue to be available with the Project conditions, particularly with imposition of Mitigation Measure IV.E-2, and therefore impacts are less than significant. (EIR, p. IV.E-44.)

Parking Impacts: The Project is located in a Transit Oriented District as defined by the Pasadena Zoning Code. (EIR, p. IV.E-48.) A shared parking analysis was conducted which concluded that there is adequate parking at 2 N. Lake Avenue to provide for the uses in that building as well as the needs of the Project in each phase and upon completion that cannot be met on-site. Mitigation Measure IV.E-4 requires this arrangement to be recorded through a parking agreement. (EIR, pp. IV.E-50 to 53.) To satisfy Phase I Zoning Code required parking, the parking structure located at 2 N. Lake Avenue would provide the required spaces until Phase II is built and Phase I parking is provided on-site. Up to 162 spaces would be provided for the project off-site at 2 N. Lake Avenue. (Ibid.) A portion of the subterranean parking garage will be completed and the existing parking structure on-site is anticipated to be demolished in Phase II. All of the Phase II required parking can be provided on-site. (EIR, pp. IV.E-48 to 49.) Under Phase III, 550 spaces will be located on-site and 100 spaces will be off-site at the 2 N. Lake Avenue parking structure. (EIR, pp. IV.E-49.) It is anticipated that the construction workers would be transported to the project site using shuttles (bus or van) and would not park on-street. (EIR, p. IV.E-56.) Therefore, no parking impacts would result due to the overall Project.

Construction Impacts: The peak hour trips generated during the construction of each phase of the Project is less than significant. (EIR, p. IV.E-54, table IV.E-24.) Construction activity would usually occur between the hours of 6:00 AM to 3:00 PM. However, Mitigation Measure IV.E-6 requires that construction truck traffic be restricted

to the hours of 9:00 AM to 3:00 PM, outside of the typical PM peak hour, unless through the construction traffic management plan required by Mitigation Measure IV.E-5 the applicant and Pasadena DOT are able to agree to a plan that maintains a less than significant impact during the PM peak hour. In order to maintain key elements of the transportation infrastructure in an operable manner during construction and to minimize the construction impacts, a construction traffic management plan is required by Mitigation Measure IV.E-5 for each of the three phases of construction. During Phase III construction, the plan will require that all the sidewalks, crosswalks and travel lanes along Lake Avenue, Mentor Avenue and Colorado Boulevard would be available and that pedestrian and vehicular access and circulation within and in the vicinity of the Project site would be maintained at all times. Further, Mitigation Measure IV.E-7 prohibits construction traffic from blocking traffic lanes on surrounding streets. With implementation of these mitigation measures, the traffic effects due to construction would be minimized and no adverse construction traffic impacts would occur. (EIR, p. IV.E-53 to 56.)

Comment letter No. 8. The City received a detailed and critical comment letter regarding the traffic impact analysis of the Project. The City finds that the responses to the comments raised in that letter are detailed and accurate; the comment letter inaccurately describes a transit oriented district as codified in the Pasadena Municipal Code and relies on other inaccurate factual assumptions; the traffic study on which the EIR relied is thorough and accurate; the transit credits were applied accurately and

consistent with the City's past practices; and the City may rely on the expert traffic report and analysis set forth in the EIR. (See EIR, pp. IX.A-37 to 41.)

Cumulative Impacts

As is standard in the industry, cumulative projects were included in the Project traffic study and were accounted for when drafting the mitigation measures listed above. The Cumulative (Future Year 2015) Plus Phase III Project conditions indicate that the overall Project will cause significant traffic impact at the intersection of Lake Avenue/Walnut Street during the weekday evening peak hour. No significant impact would occur at any of the other analyzed intersections. In order to mitigate the significant traffic impact, the Project would provide funding for the acquisition and operation of one shuttle bus to serve the project area (Mitigation Measure IV.E-11). The Project will have significant, unmitigable segment impacts, and therefore a significant cumulative impact remains. All other traffic, parking, and access impacts are not cumulatively significant. (EIR, p. IV.E-61.)

V. RESOLUTION REGARDING ALTERNATIVES

The City Council declares that the City has considered and rejected as infeasible the alternatives identified in the Final EIR as set forth herein. CEQA requires that an EIR evaluate a reasonable range of alternatives to a project, or to the location of a project, which: (1) offer substantial environmental advantages to the proposed project, and (2) may be feasibly accomplished in a successful manner within a reasonable period of time considering the economic, environmental, social and technological factors

involved. An EIR must only evaluate reasonable alternatives to a project which could feasibly attain most of the basic project objectives, and evaluate the comparative merits of the alternatives. In all cases, the consideration of alternatives is to be judged against a rule of reason.

The lead agency is not required to choose the environmentally superior alternative if the alternative does not provide substantial advantages over the project, and (1) through the imposition of mitigation measures the environmental effects of a project can be reduced to an acceptable level, or (2) there are social, economic, technological or other considerations which make the alternative infeasible.

The Final EIR identified the objectives for the Project as follows (see EIR, p. II-26):

- Renovate and preserve the existing historic landmark to Secretary of the Interior Standards by returning the Constance Hotel to its original use.
- Develop an underutilized site that will attract and retain businesses while promoting local job growth east of Lake Avenue.
- Provide a compatible mixture of commercial and service uses at the site.
- Support the existing major office corridor on S. Lake Avenue and reinforce the importance of N. Lake Avenue and Colorado Boulevard as a key employment node by providing a commercial development housing a Class A office building.
- Improve the streetscape and create active sidewalks along Lake Avenue, Colorado Boulevard, and Mentor Avenue by providing pedestrian-oriented ground floor uses, linkages to newly created open space, and street-wall connectivity with pedestrian friendly character.
- Provide a hotel land use on the site that will bring visitors to the area to support nearby amenities such as the neighborhood playhouse, art and entertainment districts, and commercial district.
- Create mobility option for residents, employees and visitors (bikes, transit, walking) by developing a Class A office building in a Transit Oriented District which will provide the minimal amount of required parking stalls,

optimize use of the existing transit infrastructure, and encourage the “park once” strategy.

- Promote building forms that respect the local context and interface with adjacent properties.
- Create informal gatherings spaces that can be utilized year-round by providing the community with additional open space.
- Develop a LEED project (Silver anticipated) in support of the City's Green City plan.

The alternatives analyzed in the EIR represent a reasonable range of alternatives based on the applicable provisions of the CEQA Guidelines.

a. NO PROJECT/RETAIN EXISTING CONDITIONS (ALTERNATIVE 1)

Pursuant to Guidelines Section 15126.6, the EIR discussed a No Project Alternative. The No Project Alternative assumes that the Project is not developed on the site and that the site, including the existing bank, existing retail/commercial uses, and the vacant hotel structure are retained for ongoing/future use and occupancy. Rehabilitation/re-occupancy of the former hotel is considered a possible scenario that could occur under No Project conditions as well, occupied as of right under the Zoning Code with no discretionary approvals necessary as senior housing (154 units are assumed for this scenario), or reoccupied with a hotel use. Future longer-term development opportunities would also remain open for the property. (EIR, pp. VI-4 to 5.) This alternative would reduce or avoid most (if not all, in the case of existing conditions remaining as is and the former hotel structure continuing to be vacant) of the significant, less than significant, and significant but mitigated environmental impacts of the Project. (Id. at pp. VI-5 to 10.) Should the former Constance Hotel structure be re-

occupied with either a senior housing or hotel use, the alternative could still result in unmitigated street segment impacts at two street segments (i.e., Mentor Avenue between Union Street and Colorado Boulevard and Mentor Avenue between Green Street and Cordova Street) and significant air quality impacts during renovation from exceedances of PM_{2.5} and PM₁₀. These impacts could possibly be reduced further if the former Constance Hotel was reoccupied with senior housing. (Id. at pp. VI-9 to 10.) Unlike the Project, the existing hotel courtyard would remain and not require re-construction, however conditions would continue to deteriorate. Similarly, no new construction adjacent to existing historic resources or demolition of any other structures on the property (including historic 1926 storefronts) would occur with the alternative and the less than significant impacts of the Project (with mitigation) would be further reduced. (Id. at p. VI-7.) In either instance (whether or not the existing former hotel is re-occupied), no new construction would occur and all associated impacts with those uses would be eliminated.

Assuming the site remains in its current state, the No Project/Retain Existing Conditions Alternative would not meet any of the Project objectives. These include renovating and preserving an existing historic landmark, developing an underutilized site that will retain and attract businesses and promote job growth, providing a hotel use to bring visitors to the area, providing an office building in a Transit Oriented District that creates new mobility options for employees and visitors, providing a key employment node and improving new streetscape and creating active sidewalks. (EIR, p. VI-11.) In

the event the former Constance Hotel is re-occupied for as senior housing or for uses comparable to those proposed for Phase I of the Project, then some, but not all, of the key Project objectives would be met. Specifically, the alternative would renovate and preserve an existing historic landmark, and with the hotel reuse would renovate and provide a new hotel use to bring visitors to the area. However, it would not meet other objectives of developing an underutilized site to attract business and promote job growth, providing a new office building in a TOD that creates new mobility options, or supporting the existing major office corridor on S. Lake Avenue. (Ibid.)

The No Project/Retain Existing Conditions Alternative is considered to be the environmentally superior alternative in comparison to the Project. (EIR, p. VI-80.) However, for CEQA purposes this alternative is rejected because it does not meet any of the Project objectives.

**b. PROPOSED PROJECT WITHOUT HEIGHT AVERAGING
(ALTERNATIVE 2)**

While the Project conforms to the existing CD-5-Central District Zone, and all requested uses and density are similarly permitted, approval of Height Averaging for the new office building as part of the City of Pasadena Design Commission Concept and Final Design is required for the current design. This alternative evaluates how the current design could differ, if Height Averaging was not applied. The alternative would shift massing of the office building to conform to a maximum 75-foot height. (EIR, p. VI-12.) The EIR includes three options under this alternative, as well as informative

multiple perspectives and exhibits of each of these three options. (EIR, pp. VI-12 to 16; see also Appendix L.)

As the alternative assumes the same program as the Project, population/use driven impacts would be the same. (EIR, pp. VI-17 to 23.) The only impacts that would change would be physical impacts associated with the massing reconfiguration within the Project. Proposed phasing and construction schedule would not change with this alternative, nor would provision of total (650 spaces) and off-site parking (100 spaces at 2 N. Lake). Consequently, the alternative would not reduce any of the environmental impacts of the Project, but in limited instances could increase Project impacts. Specifically, the alternative could increase the significant unmitigated impact to historical resources by obstructing/encroaching upon the available view of the former Constance Hotel structure (a designated historic resource) and associated open space including the hotel courtyard, in addition to demolition of the existing 1926 storefronts. (EIR, pp. 18 to 20.)

This alternative would meet many Project objectives with respect to preserving an existing historic landmark, providing a new hotel use to bring visitors to the area, developing an underutilized site to attract business and promote job growth, providing a new office building in a TOD that creates new mobility options, and supporting the existing major office corridor on S. Lake Avenue. However, objectives relating to promoting building forms that respect the local context and interface with adjacent properties and creating informal gatherings spaces by providing the community with

additional open space, may be compromised or sacrificed by moving massing around the site to maintain a 75-foot height limit. (EIR, p. VI-23.)

For CEQA purposes this alternative is rejected because it does not reduce any of the unmitigable significant effects of the Project and could exacerbate some of the significant effects.

**c. REDUCE NEW DEVELOPMENT – HOTEL AND RESIDENTIAL
OPTIONS (ALTERNATIVE 3)**

This alternative would reduce total development (converted and new) to approximately 90% of that proposed by the Project while still converting the former Constance Hotel structure to the proposed hotel use (156 rooms converted and new) or with 81 multi-family residential units (converted and new). Existing retail space along Colorado Boulevard would also be retained and renovated, with ground floor retail also provided in the former Constance Hotel if converted to residential uses. The proposed office building, restaurant and retail space of approximately 196,000 square feet would be reduced to approximately 154,000 square feet. Total site development and reuse of approximately 261,000 square feet would be reduced to approximately 235,000 square feet (residential) or 242,000 square feet (hotel). A new parking structure would be built but unlike the Project, it would include above grade parking in addition to on grade and subterranean parking, as well as provision of limited shared parking with 2 N. Lake. A secondary option to reduce Project density could be accomplished by converting the former Constance Hotel structure to 136 hotel rooms as proposed by Phase I of the

current program, but similarly reducing other uses within the site as proposed by the alternative. Both options would achieve programs that are approximately 90 percent of the density of the Project. Under both options, the retention of existing retail uses along Colorado Boulevard and the reduction in new development would also allow for the existing hotel courtyard to remain with a new internal paseo that links to the street. The office building would be built to the same height as the office building proposed in the Project with the same number of occupied floors. (EIR, pp. VI-24 to 31.)

The alternative reduces both occupancy driven (e.g., traffic, utilities) and physical (e.g., aesthetics, historic resources) impacts of the Project. The retention and rehabilitation of existing retail storefronts along Colorado Boulevard that would be replaced with new development with the Project would remain with the alternative, and the overall street presence and visibility of the project would be commensurately reduced. (EIR, pp. VI-31 to 33.) Significant air quality impacts that would occur with construction would be reduced both in peak day emissions and in overall duration, but would still remain significant and unmitigated with this alternative. (Id. at pp. VI-36 to 39.) The remnant historic fabric present in the 1926 Colorado Boulevard storefronts that would be removed with the Project would be retained and integrated into the alternative. Consequently, the alternative (with either the hotel or residential option) would reduce a significant unmitigated impact of the project to historical resources, to a less than significant level. Mitigation measure IV.C-5 would be deleted. (Id. at pp. VI-39 to 41.) Alternative 3 was analyzed to the same level of detail as the Project in the

traffic study. The alternative would modestly reduce traffic impacts, but significant impacts would still occur at three street segments with the hotel option (Mentor Avenue between Walnut Street and Union Avenue, Mentor Avenue between Union Street and Colorado Boulevard, and Mentor Avenue between Green Street and Cordova Street), and at two street segments with the residential option (i.e. Mentor Avenue between Walnut Street and Union Street and Mentor Avenue between Union Street and Colorado Boulevard) would still occur (under the residential option). Mitigation measures IV.E-11 and IV.E-12 would not be required. (Id. at pp. VI-42 to 56.) While overall utility consumption/generation would also be slightly reduced with the alternative, similar improvements and mitigation would be expected to service the mix of uses and overall density on the site. (Id. at p. VI-57.) In most other instances, the impacts of the Project analyzed in this EIR would not appreciably change.

This alternative would meet most of the Project objectives, especially those with respect to preserving an existing historic landmark, providing a new hotel use to bring visitors to the area (but not with the residential option), developing an underutilized site to attract business and promote job growth, providing a new office building in a TOD that creates new mobility options, and supporting the existing major office corridor on S. Lake Avenue (although fewer office jobs would be created). The alternative would further preserve existing historical resources (e.g., 1926 storefronts along Colorado Boulevard) that would otherwise be removed with the Project, and thus, would further meet preservation objectives. Additionally, the objective to improve streetscape and

create active sidewalks would be further enhanced by the retention of more existing uses, and mixed newer uses along Colorado Boulevard. Similarly, objectives relating to promoting building forms that respect the local context and interface with adjacent properties can all be met. However, the residential option under this alternative would not meet the objective to provide a hotel land use to attract more visitors to the area, but the hotel option would. Consequently, the alternative, at a minimum, would meet most of the same objectives as the Project, and in several instances would exceed the objectives established by the Project. (EIR, pp. VI-57 to 58.) Alternative 3 would be considered environmentally superior to the Project, and would meet or exceed many Project objectives. (Id. at p. VI-58.)

For CEQA purposes this alternative cannot be rejected. It is less impactful across every resource area than the Project, although potentially significant effects still remain. Further, it would meet or exceed many of the Project objectives.

d. ELIMINATE TRAFFIC IMPACTS/REDUCED PROJECT (ALTERNATIVE 4)

This alternative would reduce trip generation to a level where significantly impacted street segments would be eliminated (1,712 daily trips or less). As with Alternative 3, this alternative would have residential and hotel options for re-use of the former Constance Hotel structure in an initial phase, but would reduce new development in subsequent phasing. Existing historical storefronts on Colorado Boulevard could also be retained with this alternative. New office, restaurant and retail

space would be substantially reduced compared to the Project to achieve trip reductions sufficient to eliminate traffic impacts to intersections and street segments. As with the Project, it is presumed that some portion of parking for the alternative could be provided at 2 N. Lake and that on-site parking could be provided by a parking structure with some subterranean levels. Trip generation reductions would be achieved by adjusting land uses across the site. Total site development and reuse of approximately 255,000 square feet would be reduced to approximately 154,000 square feet with the hotel option and 174,000 square feet with the residential option. (EIR, pp. VI-58 to 61.)

The alternative reduces both occupancy driven (e.g., traffic, utilities) and physical (e.g., aesthetics, historic resources) impacts of the Project. In particular, the historic fabric present in the 1926 Colorado Boulevard storefronts that would be removed with the Project would be retained and integrated into the alternative. Consequently, the alternative (with either the hotel or residential option) would reduce a significant unmitigated impact of the Project to historical resources, to a less than significant level. (EIR, pp. VI-69 to 71.) Similarly, significant air quality impacts that would occur with construction would be reduced both in peak day emissions and in overall duration, but would still remain significant and unmitigated with this alternative. (Id. at p. 67 to 69.) Alternative 4 would also reduce traffic impacts, including eliminating significant street segment impacts at Mentor Avenue between Walnut Street and Union Street, Mentor Avenue between Union Street and Colorado Boulevard and Mentor Avenue between Green Street and Cordova Street that would otherwise require mitigation. (Id. at pp. VI-

72 to 79.) Overall utility consumption/generation would also be reduced with the alternative, although similar improvements and mitigation would be expected to service the mix of uses and overall density on the site. (Id. at p. VI-79.) Unlike the Project, Alternative 4 would not require approval of height averaging, however, most major entitlements would likely still be required. Given that significant unmitigated impacts to historic resources (1926 storefronts) and traffic (street segments) would be reduced less than significant under the alternative, Alternative 4 would be considered environmentally superior to the Project.

This alternative would meet most of the Project objectives, especially those with respect to preserving an existing historic landmark, providing a new hotel use to bring visitors to the area (but not with the residential option), developing an underutilized site to attract business and promote job growth. The alternative would further preserve existing historical resources (e.g., 1926 storefronts along Colorado Boulevard) that would otherwise be removed with the Project, and thus, would further meet preservation objectives. The objective to improve streetscape and create active sidewalks would be further enhanced by the retention of more existing uses mixed newer uses along Colorado Boulevard. Similarly, objectives relating to promoting building forms that respect the local context and interface with adjacent properties can all be met. However, given the substantial reduction in office space in comparison to the Project, neither the hotel or residential options under this alternative would meet objectives relative to promoting job growth and establishing Lake Avenue as a major office corridor

and employment node. Consequently, the alternative would meet some, but not all of the same objectives as the Project. (EIR, p. VI-80.)

CEQA Guidelines Section 15126.6(c) requires identification of the environmentally superior alternative, and if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. The No Project Alternative is the environmentally superior alternative in this case. (EIR, p. VI-80.) Among the other alternatives, Alternative 4 (Eliminate Traffic Impacts/Reduced Project–Hotel and Residential Options Alternative) would reduce the most significant impacts of the Project and therefore would be the environmentally superior alternative. However, Alternative 4 would only meet some, but not all, project objectives due to the substantial reduction in Project density, the decrease in office space and associated employment benefits. Associated objectives relative to promoting job growth and establishing Lake Avenue as a major office corridor and employment node would not be met with this Alternative. (Id. at p. VI-81.)

For CEQA purposes this alternative cannot be rejected. It is less impactful across every resource area than the Project, although potentially significant effects still remain. Further, it would meet most of the basic Project objectives.

VI. RESOLUTION REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

State CEQA Guidelines Section 15126.2(c) requires an EIR to discuss the significant irreversible environmental changes which would be caused by the proposed project. An impact would occur under this category if, for example: (1) the Project involved a large commitment of nonrenewable resources; (2) the primary and secondary impacts of the Project would generally commit future generations to similar uses; (3) the Project involves uses in which irreversible damage could result from any potential environmental incidents associated with the Project; and (4) the proposed consumption of resources are not justified (for example, results in wasteful use of resources).

Construction of the Project would result in a commitment of limited, slowly renewable, and nonrenewable resources. Such resources would include certain types of lumber and other forest products; metals such as steel, copper, and lead; aggregate materials used in concrete and asphalt (e.g., stone, gravel, and sand); and other construction materials such as plastic. In addition, fossil fuels used in construction vehicles would also be consumed during construction of the Project. Operation of the Project would involve the continued consumption of limited, nonrenewable, and slowly renewable resources similar to other projects. These resources would include natural gas and electricity, petroleum-based fuels, fossil fuels, and water. Energy resources would be used for heating and cooling of buildings, transporting people and goods to and from the site, heating and refrigeration for food storage and preparation, heating

and cooling of water, and lighting. Operation of the Project would occur in accordance with Title 24, Part 6 of the California Code of Regulation, which sets forth conservation practices that would limit the amount of energy consumed by the Project, and the Project would meet City of Pasadena's Green Building Program requirements to comply with Leadership in Energy and Environmental Design (LEED) standards under the US Green Building Council (USGBC). Nonetheless, the use of such resources would still continue to represent a long-term, irreversible commitment of these resources. In addition, the limited use of common hazardous materials on the site, including cleaning agents and pesticides for landscaping, would be used, handles, stored, and disposed of in accordance with applicable regulations and standards. Thus, the Project would not result in a significant and irreversible environmental change associated with the accidental release of hazardous materials. (EIR, pp. V-2 to 3.)

VII. RESOLUTION REGARDING GROWTH-INDUCING IMPACTS

State CEQA Guidelines Section 15126.2(d) requires an EIR to discuss the 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. Growth inducement, however, is not considered necessarily detrimental, beneficial, or significant to the environment.

As the Project would include a residential component, it will directly result in a permanent, (but small) full-time population growth in the area. The Project, however, would not significantly impact existing schools or other community services in the area.

In addition, while the Project would increase the daytime population in the area due to the addition of hotel guests, residents and employees, the Project is not expected to induce people to move to the area (other than the small residential component already discussed). Thus, the Project would not induce population growth, and while it could foster a degree of economic growth due to the increase in employees, and visitors to the area, such growth-inducement would not be significant. Furthermore, the Project would not induce growth in an area that is not already developed with infrastructure to accommodate such growth. The Project site is located within an urbanized area on one of the City of Pasadena's main commercial streets and is currently developed. Additionally, it would be located in close proximity to various public transportation opportunities. The Project would incorporate new improvements, including some minor localized street improvements to accommodate access to the site, as well as water sewer connection improvements. These infrastructure improvements would serve the proposed uses and any excess capacity that may be provided by such improvements would not be to such a degree so as to induce or introduce additional growth in the area. Overall, the Project would not result in an increase in the population that may tax existing community service facilities, or encourage or facilitate other activities that could significantly affect the environment or the area, either individually or cumulative. Thus, the Project would not result in significant growth-inducing impacts. (EIR, p. V-3.)

VIII. RESOLUTION REGARDING CUSTODIAN OF RECORDS

The documents and materials that constitute the record of proceedings on which these findings have been based are located at the City of Pasadena, City's Planning and Development Department at 175 North Garfield Avenue, Pasadena, California 91101.

Adopted at the _____ meeting of the City Council on the _____ day of _____, 2010 by the following vote:

AYES:

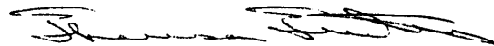
NOES:

ABSENT:

ABSTAIN:

MARK JOMSKY, CMC
CITY CLERK

APPROVED AS TO FORM:



Theresa E. Fuentes
Assistant City Attorney