

RESOLUTION NO \_\_\_\_\_

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PASADENA  
CERTIFYING THE ENVIRONMENTAL IMPACT REPORT, AND ADOPTING CEQA  
FINDINGS AND A MITIGATION MONITORING AND REPORTING PROGRAM FOR  
THE ALL SAINTS CHURCH MASTER DEVELOPMENT PLAN**

**WHEREAS**, the All Saints Church has submitted applications to the City of Pasadena ("City") for the expansion of their existing church located at 132 North Euclid Avenue, including applications for a Master Development Plan, Conditional Use Permits, and Variances ("Proposed Project"); and

**WHEREAS**, to comply with the California Environmental Quality Act ("CEQA"; Pub. Res. Code §§ 21000 et seq; Tit. 14, Cal. Code of Regs. §§ 15000 et seq.), the City prepared, circulated, and posted in the County Clerk's Office, an Initial Study/Notice of Preparation for review from October 19, 2009 through November 19, 2009 in compliance with CEQA Guidelines Sections 15063 and 15082; and

**WHEREAS**, the City held a scoping meeting on October 28, 2009, before the City of Pasadena Planning Commission ("Planning Commission"), consistent with CEQA Guidelines Section 15083; and

**WHEREAS**, the City prepared and circulated a Draft Environmental Impact Report for comment from July 19, 2010 through October 1, 2010, and provided Notice of Availability and a Notice of Completion in compliance with CEQA Guidelines Sections 15087 and 15085; and

**WHEREAS**, the City held duly noticed public hearings / meetings on the Proposed Project and the Draft Environmental Impact Report, including a meeting before the City of Pasadena Transportation Advisory Commission on September 9, 2010, a meeting before the City of Pasadena Design Commission (“Design Commission”) on September 13, 2010, and a hearing before the Planning Commission on September 22, 2010; and

**WHEREAS**, after receiving comments on the Draft Environmental Impact Report, the City revised the alternatives analysis, recirculated portions of the Draft Environmental Impact Report related to these additional alternatives (“*Recirculated Draft Environmental Impact Report*”), provided an additional comment period from May 13, 2011 through June 27, 2011, and provided an additional Notice of Availability and Notice of Completion, in compliance with CEQA Guidelines Sections 15087 and 15085; and

**WHEREAS**, the City held additional, duly noticed public hearings / meetings on the Proposed Project and the Recirculated Draft Environmental Impact Report, including a meeting before the Design Commission on May 23, 2011, and a hearing before the Planning Commission on May 25, 2011; and

**WHEREAS**, the City prepared and released the Final Environmental Impact Report (FEIR) on January 24, 2012; and

**WHEREAS**, the Design Commission held a duly noticed public meeting on the Proposed Project and the FEIR, on February 27, 2012, at which time it received and

considered written and oral comments, and provided recommendations to the Planning Commission and City Council; and

**WHEREAS**, the City of Pasadena Planning Commission held a duly noticed public hearing on the Proposed Project and the FEIR, on February 29, 2012, continued to March 14, 2012, at which time it received and considered written and oral comments, and provided recommendations to City Council; and

**WHEREAS**, consistent with CEQA Guidelines § 15132, the FEIR includes the “Draft Environmental Impact Report” dated July 2010, the “*Recirculated Draft* Environmental Impact Report” dated May 2011, and the “*Final* Environmental Impact Report” (Chapter 8) dated January 2012, which includes Section 8.1 (Addenda and Errata), Section 8.2 (Comments and Responses), Section 8.3 (Revised Section 4.3), several additional figures, Appendix A (Revised Historical Resources Report), Appendix B (Sense of Place Guidelines), Appendix C (Public Notices), Appendix D (Traffic Study, Revised Table 5); and

**WHEREAS**, the City Council also includes in the FEIR, the ICF International Report, dated March 30, 2012, and the March 14, 2012 memorandum from ICF International titled “Response to memo dated March 13, 2012 from Ann Scheid” (collectively “ICF Reports,” attached to the City Council staff report of this same date as Attachment F). These ICF Reports were prepared to address a request by Design Commission relating to subsequent design review findings under Pasadena Municipal Code 17.61.030(k)(2). Inclusion of these ICF Reports, while not required by CEQA (as

described in *Final* Environmental Impact Report, Section 8.2, General Response #2), is consistent with CEQA Guidelines Section 15132(e), which permits “any other information added by the lead agency;” and

**WHEREAS**, when reading and interpreting the FEIR, revisions contained in the most recent document shall take precedence, for example the “*Final* Environmental Impact Report” shall take precedence over the “*Recirculated Draft* Environmental Impact Report”, and the revisions contained in the “*Recirculated Draft* Environmental Impact Report” shall take precedence over the “Draft Environmental Impact Report;” and

**WHEREAS**, the City Council of the City of Pasadena (“City Council”) is the final decision making body for the City of Pasadena for Master Plans and any other land use entitlement bundled with Master Plans, such as in this case Conditional Use Permits, and Variances, under Pasadena Municipal Code Section 17.61.050(I)(3)(b); and

**WHEREAS**, prior to any discretionary approvals associated with the All Saints Church expansion, the City Council must certify the FEIR pursuant to CEQA Guidelines Section 15090, make CEQA Findings pursuant to CEQA Guidelines Section 15091, and adopt a Mitigation Monitoring and Reporting Program (“MMRP”) consistent with CEQA Guidelines Section 15097; and

**WHEREAS**, CEQA Findings and a MMRP have been prepared by the City and are included as Exhibits 1 and 2 hereto.

**NOW, THEREFORE, BE IT RESOLVED** by the City Council that the above recitals are true and correct and are incorporated herein by reference as if set forth in full.

**BE IT FURTHER RESOLVED** that the City Council has reviewed and considered the Design Commission's and the Planning Commission's recommendations associated with the All Saints Church expansion, including the recommendations on the Master Plan, the Conditional Use Permits, the Variances, and the FEIR as set forth in the Staff Report to the City Council dated April 16, 2012.

**BE IT FURTHER RESOLVED** that the City Council has reviewed and considered all oral and written testimony received.

**BE IT FURTHER RESOLVED** that the City Council certifies that (1) the FEIR has been completed in compliance with CEQA, (2) the FEIR was presented to the City Council and that the City Council reviewed and considered the information contained in the FEIR prior to approving the project, and (3) the FEIR reflects the City of Pasadena's independent judgment and analysis.

**BE IT FURTHER RESOLVED** that the City Council adopts the CEQA Findings contained in Exhibit 1.

**BE IT FURTHER RESOLVED** that the City Council adopts the Mitigation Monitoring and Reporting Program contained in Exhibit 2.

Adopted at the \_\_\_\_\_ meeting of the City Council on the \_\_\_\_\_ day of \_\_\_\_\_, 2012 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

---

Mark Jomsky, CMC  
City Clerk

APPROVED AS TO FORM

  
Theresa E. Fuentes  
Assistant City Attorney

# EXHIBIT 1

## California Environmental Quality Act -- Findings of Fact

### All Saints Church Master Development Plan (SCH # 2009101073)

#### I. CEQA FINDINGS

##### I.1 Project Description Summary<sup>1</sup>

The Project is the expansion of the All Saints Episcopal Church. The applicant, The Reverend J. Edwin Bacon, Jr. and Vestry of the All Saints Church, applied for a Master Plan, Conditional Use Permits, and Variances for this expansion.

In December 2011, the Project applicant submitted an alternative to the Proposed Project<sup>2</sup> to address community concerns regarding demolition and relocation of the Maryland Hotel Wall, the location of the proposed Building A in relation to the Wall, the spatial relationship of the Wall to its surroundings, and a garden area behind the Wall. This proposed Alternative is identified as Alternative 7 in the Final Environmental Impact Report ("FEIR") and is referred to as the "Project" or "Alternative 7" in these findings. While the Revised/Recirculated Draft EIR ("RDEIR") already included a reasonable range of alternatives, Alternative 7 was included in the FEIR to address these community concerns. These Findings have been provided for the approval of Alternative 7 (including Conditions of Approval and Mitigation Measures) in the FEIR (Section 8.2, General Response #3).

The Project site is located in downtown Pasadena at 132 North Euclid Avenue. The Project site consists of three parcels totaling approximately 2.79 acres, located within the City of Pasadena at the southeast corner of North Euclid Avenue and Walnut Street in the Civic Center sub-district of the Central District Specific Plan Area. Adjacent, surrounding uses include: the Kaiser Permanente parking lot and offices to the north; the Plaza Las Fuentes Complex (hotel, office and restaurant uses) to the east; multi story residential, office and parking structures, surface parking lots and the Western

---

<sup>1</sup> This Project Description Summary is only intended to provide a brief overview of the Project. The Resolution(s) on the Project approvals (i.e. Master Plan, Conditional Use Permits, Variances, Design Review, Landscape and Irrigation Plan, etc.), Conditions of Approval, and the MMRP control the scope of the Project.

<sup>2</sup> References to the "Proposed Project" refer to the "Proposed Project" identified in Chapter 2 of the Recirculated Draft Environmental Impact Report ("RDEIR").

Asset Office Complex to the south; the Civic Center to the southwest; and a Los Angeles County Courthouse to the west.

Development under the Master Plan would include demolition of some of the existing structures as well as interior renovation and conversion of other structures. New construction would include a four building complex: Buildings A (13,643 sq. ft.), Building B (6,700 sq. ft.), Building C (18,000 sq. ft.), and Building E (11,965 sq. ft.).

Demolition will remove a 1,487 square foot commercial building, Scott Hall (a 6,195 square foot building used for Sunday School / day care purposes), and a 1,800 square foot trailer used for office and meeting space would be removed.

The existing Rectory and the subterranean level of the existing parish hall (Regas House) will be renovated; the subterranean level of Regas House will be converted to a music room.

Outdoor spaces will include a forecourt between the existing Rectory and Building A (the West Building), a pre-function garden, an outdoor seating area on the north side of Building A, two play yards, and a garden with a labyrinth on the east portion of the site. (See EIR Figure 2-4.)

Construction will add a columbarium along the interior of the east property line; a subterranean parking level with approximately 12,500 square feet of office, storage and mechanical equipment areas and approximately 128 parking spaces with vehicular access from Walnut Street (depicted in EIR Figure 2-9), and a multiple story, four building complex as described below (Buildings A, B, C and E):

**Building A – West Building.** As described in EIR Section 8.2, General Response 3, Revised Configuration of Building A (Alternative 7), Building A, the West Building, is 13,643 GSF, and includes a second story landscaped façade along the North Euclid Avenue elevation. The Maryland Hotel Wall will remain in its current location and the two palm trees that line the sidewalk west of the wall would remain in their current location. At ground level, the Building A and the Maryland Hotel Wall will be parallel for approximately 14 feet; a screen will also parallel the building and extend approximately 12 feet beyond the south end of the building. Compared with the Proposed Project, Building A is shortened by approximately 55 feet, extends several feet further north, is several feet wider along its east west axis and is 1,035 GSF smaller than in the Proposed Project.

**Building B - Forum-Alternate Worship.** Building B for the Project (Alternative 7) is the same as for the Proposed Project. Building B is a 6,700 square foot, two-level assembly building, approximately 54 feet in height, built on a circular plan with four slightly curved walls. The building will open onto a plaza for use as supplemental outdoor seating for



large events. An eight to ten foot, straight wall will run from the southern boundary of Building B toward the existing Regas House. A labyrinth and contemplative garden will be adjacent to the southern edge of the building.

**Building C - East Building.** Building C for the Project (Alternative 7) is the same as for the Proposed Project. Building C is an 18,000 square foot, three-story (approximately 54 feet in height) building. The Building will house a youth program, daycare, and classroom areas (as depicted in the EIR - Figure 2-4 –ground floor and Figure 2-8 - second floor). Building C will be built in simple modular form. A row of sycamore trees will be planted in front of the western elevation of the building. The ground–floor level of the building will contain classrooms with doors opening onto the children’s play yard for indoor/outdoor teaching directly in front of the building to the west.

**Building E – North Building.** Building E for the Project (Alternative 7) will be similar to Scenario 2 for the Proposed Project, but smaller. Building E will be a two-story youth recreation building approximately 11,965 square-foot and 41 feet in height (1,035 square feet smaller than the Proposed Project). (See Figure 8.1-1, Figure 8.1-2, Figure 8.1-3 and Figure 8.1-4.). A wall will screen part of the southern portion of the Euclid Avenue frontage and the center portion of the Walnut Street building frontage. Entry doors will be at the northern portion of the frontage on Euclid Avenue. Building E will be set back further than the existing restaurant adjacent to the east of the Project site along Walnut Street. An ingress/egress ramp for the approximately 128-space subterranean parking garage, located underneath the building, will extend beyond the building footprint and will be accessible from Walnut Street at the building’s eastern boundary. The floor plan for the Project (Alternative 7) is shown in black in Figures 8.1-1 through 8.1-3 in the Final EIR.

## **I.2 Project Objectives**

### ***Main Project Objectives***

- A) Provide new spaces and update and reconfigure existing spaces through the construction, rehabilitation and configuration of buildings that will serve the spiritual needs of All Saints Church and allow for the expansion of the religious and community serving programs and activities of All Saints Church.
- B) Organize new buildings and spaces with massing, voids, shapes and adjacencies that maximize the functionality of the site and integrate the new and existing parts of the campus visually and functionally, all in a manner that expresses the religious and community serving mission of All Saints Church.
- C) Create an inspiring and sensitive design that expresses through architecture respect for the historical foundations of All Saints Church seen in its historically

significant existing campus while embodying its relevance to the future in contemporary architectural styles that relate to the old in massing, materials and adjacencies.

### ***Supporting Project Objectives***

- 1) Provide separate buildings specifically designed for their particular use and locate those buildings in places most appropriate to their size and nature of use.
- 2) Integrate into the architecture and grounds sacred shapes and spaces.
- 3) Where possible use outdoor spaces instead of building mass to meet religious and community program needs.
- 4) Create a large “outdoor room” for religious and community uses by orienting the buildings to create a protected courtyard using the historic church buildings as the “fourth wall” of the room to serve as a welcoming, yet private, space suitable for such uses as worship, weddings, funerals, counseling, grieving and contemplative prayer.
- 5) Develop the courtyard as a single unified space which allows access from all of the new buildings into a central community gathering place and provides an unbroken visual connection between the new buildings on the north end of the campus and the historic Rectory and Church buildings on the south.
- 6) Integrate indoor and outdoor spaces through utilization of materials which allow for a visual connection between the indoor and outdoor meeting and assembly spaces.
- 7) Carry into the new architecture materials and concepts from the historic building and use them in contemporary applications and proportions.
- 8) Locate buildings with reference to access from surrounding public streets, pedestrian travel times within the campus and creation of the sense of an active and unified religious community.
- 9) Design buildings at locations and scale respectful of the adjacent and surrounding historic buildings and structures, including the existing church buildings, the Maryland Hotel Garden Wall and the Civic Center.

- 10) Maximize the use and attractiveness of the site through development of below grade parking.
- 11) Build into the plan uses that serve the community such as a public café and meeting and assembly rooms accessible directly from Euclid.
- 12) Design well landscaped streetscapes and points of entry to the church campus to enhance the pedestrian experience within the Civic Center.
- 13) Contribute quality architecture to the rich and diverse pattern of architectural styles in Pasadena in compliance with the Central District Specific Plan and applicable historic resources regulations.
- 14) Construct buildings with an environmentally sustainable design which will minimize depletion of natural resources and which will qualify for a LEED rating.

### **I.3 Procedural Compliance with CEQA**

A Mitigated Negative Declaration (“MND”) was originally prepared in 2008. On December 10, 2008, Planning Commission reviewed the MND and recommended that a Draft Environmental Impact Report (“DEIR”) be prepared.

To start the Draft EIR process, the City prepared, circulated, and posted in the County Clerk’s Office, an Initial Study/Notice of Preparation for review from October 19, 2009 through November 19, 2009 in compliance with CEQA Guidelines Sections 15063 and 15082. The City held a scoping meeting on October 28, 2009, before the City of Pasadena Planning Commission (“Planning Commission”), consistent with CEQA Guidelines Section 15083.

The City prepared and circulated a Draft Environmental Impact Report for comment from July 19, 2010 through October 1, 2010, and provided Notice of Availability and a Notice of Completion in compliance with CEQA Guidelines Sections 15087 and 15085. The City held duly noticed public hearings / meetings on the Proposed Project and the Draft Environmental Impact Report, including a meeting before the City of Pasadena Transportation Advisory Commission on September 9, 2010, a meeting before the City of Pasadena Design Commission (“Design Commission”) on September 13, 2010, and a hearing before the Planning Commission on September 22, 2010.

After receiving comments on the Draft Environmental Impact Report, the City revised the alternatives analysis, recirculated portions of the Draft Environmental Impact Report related to these additional alternatives (“Recirculated Draft Environmental Impact Report”), provided an additional comment period from May 13, 2011 through June 27, 2011, and provided an additional Notice of Availability and Notice of Completion, in compliance with CEQA Guidelines Sections 15087 and 15085.

The City held additional, duly noticed public hearings / meetings on the Proposed Project and the Recirculated Draft Environmental Impact Report, including a meeting before the Design Commission on May 23, 2011, and a hearing before the Planning Commission on May 25, 2011.

The City prepared and released the Final Environmental Impact Report (FEIR) on January 24, 2012 which was made available consistent with CEQA Guidelines Section 15088(b) and was made available on the City's website, the Central Library and in the Permit Center. Design Commission held a public meeting on the Proposed Project and the FEIR, on February 27, 2012, at which time it received and considered written and oral comments, and provided recommendations to the Planning Commission and City Council. Planning Commission also held a duly noticed public hearing on the Proposed Project and the FEIR, on February 29, 2012, continued to March 14, 2012, at which time it received and considered written and oral comments, and provided recommendations to City Council.

Public hearings / meetings on the Proposed Project and the *EIR* are summarized in the bullet points below:

- City of Pasadena Transportation Advisory Commission: September 9, 2010
- Design Commission: September 13, 2010; May 23, 2011, February 27, 2012
- Planning Commission: September 22, 2010; May 25, 2011, February 29, 2012 (cont'd to March 14, 2012)

#### **I.4 Environmental Impacts and Findings**

Pursuant to Public Resources Code § 21081 and CEQA Guidelines §15091, no public agency shall approve or carry out a project for which an EIR 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 with respect to each significant impact:

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

The City Council has made one or more of these specific written findings regarding each significant impact associated with the Project. Those findings are set forth below, along with a summary of facts in support of the findings.

The EIR evaluation included a detailed analysis of impacts in multiple environmental disciplines, analyzing the Proposed Project and alternatives, including a No Project Alternative and the Project. Other CEQA required considerations, including population and economic growth, removal to obstacles to growth, and irreversible environmental effects, were also analyzed. The EIR discloses the environmental impacts expected to result from the construction and operation of the Project. Where possible, mitigation measures were identified to avoid or minimize significant environmental effects. The mitigation measures identified in the EIR are measures proposed by the lead agency, responsible or trustee agencies or other persons that were not included in the Project but could reasonably be expected to reduce adverse impacts if required as conditions of approving the Project, as required by CEQA Guidelines § 15126.4(a)(1)(A).

**I.4.1 Findings of Less than Significant Impacts (Class III Impacts)<sup>3</sup>**

Based on the issue area assessment in the EIR, the City has determined that the Project (Alternative 7) will have no impact or less than significant impacts for several issue areas as summarized in the table below. The rationale for the conclusion that no significant impact would occur in each of the issue areas is supported by the discussion of these impacts in the EIR which should be read in conjunction with these findings, including the detailed issue area analyses in Sections 4.1 through 4.6 of the EIR, the Initial Study included as Appendix A to the EIR, and the Alternative 7 impact analysis provided in Final EIR, Section 8.2, General Response #3. In most instances, the summaries below provide a brief overview of the analysis for the Proposed Project, followed by additional discussion of how the analysis was modified, if at all, by Alternative 7.

<b>Significance Threshold</b>	<b>Rationale</b>
<b>4.1 AESTHETICS</b>	
<b>AES-1: Would the project substantially</b>	The scale of the Proposed Project is compatible with the existing surrounding development and the height of the proposed buildings is within the limits called for in the zoning code. The

<sup>3</sup> “Class III” (Class 3) refers to “an impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures.” “Class II” (Class 2), discussed in Section 1.4.2 of these findings, refers to “an impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures.” (See Draft EIR Page 4-1.)

<p><b>degrade the existing visual character or quality of the site and its surroundings?</b></p>	<p>Proposed Project would improve the surrounding environment by replacing select features of the existing site, including two surface parking lots, a commercial building, a trailer and Scott Hall with four buildings set amid open spaces and landscaping. The massing of the Proposed Project is portrayed in DEIR Figure 4.1-6. As discussed in the DEIR, “the scale of the project is compatible with the existing surrounding development and the height of the proposed building is within the limits called for in the zoning code... In scale and in massing, none of the proposed building would overwhelm the existing historic structures... the proposed height is similar to that of several structures located within a block or two of the project site, including the 13-story Plaza Las Fuentes complex to the east, the six-story County Court Building to the west and the five to seven-story Kaiser Permanente buildings about a half block to the north” (DEIR page 4.1-13, 4.1-16, and 4.1-20.) Additionally, the City of Pasadena Municipal Code provides that all projects shall design, install, and maintain landscaping.</p> <p>The Project (Alternative 7) would include development of four buildings, similar to the Proposed Project. However, Building A would be relocated, shortened, and widened slightly as described in the Alternative 7 description, and Building E would only be developed as a two-story gymnasium. Building A (29-foot maximum height) would include a second story landscaped façade along the N. Euclid Avenue elevation. In addition, the Maryland Hotel Wall would not be demolished or relocated, and would have a more pronounced presence on the Project site. Additionally, there would be a 120-foot wide open space/court yard area located behind 120 feet of the Wall. Similar to the Proposed Project, this alternative would be consistent with applicable policies of the Central District Specific Plan and with Citywide Design Principles and Criteria, and Impact AES-1 would be Class III, less-than-significant.</p> <p>The addition of a second story landscaped façade to Building A and the open space/garden area behind the Maryland Hotel Wall would be considered an improvement in comparison to the Proposed Project to the visual character along the N. Euclid Avenue elevation. At ground level, the building would be parallel to the wall for approximately 14 feet; a cast stone and metal screen would also parallel the building, and extend</p>
--	--

	approximately 12 feet beyond the south end of the building.
<p><b>AES-2: Would the Project have a substantial adverse effect on a scenic vista?</b></p>	<p>Figure 4.1-6 in the EIR shows the worst case scenario views with and without the Proposed Project, Scenario 1 from Thurgood Marshall Street, Union Street and City Hall. A lower building, such as the building under Scenario 2 would have less effect from the worst-case vantage; however, based on the thresholds in Section 4.1.2, the Proposed Project would not have a significant effect on a scenic vista. Nevertheless, Impact AES-2 acknowledges the two-story Scenario 2 would have less effect on existing mountain views.</p> <p>Under Impact AES-2 for Alternative 7, a two-story building at the north end of the Project site (similar to Proposed Project Scenario 2) would not alter views of the mountains as compared with current conditions. Under Alternative 7, the configurations of the open areas are different than those of the Proposed Project due to the changes to the building placement of Building A and the creation of a large open space/garden area behind the Maryland Hotel Wall. Similar to the Proposed Project, a rectangular courtyard would be located between Building A and Building E. Therefore, Alternative 7 would be Class III, less-than-significant impact.</p>
<p><b>AES-Cumulative</b></p>	<p>Cumulative/related projects within ½ mile of the Project site include both demolition of existing uses and new residential, retail, office, mixed-use and hotel developments that could cumulatively increase the urbanized nature and intensity of the Project vicinity. Developments within a ¼ mile of the Project include commercial buildings as well as new and expanded facilities at the Fuller Theological Seminary campus. Visible from City Hall, the office/retail project at 254 East Union Street would be approximately 48,000 square feet. Other projects include the mixed use development, primarily medical offices, at 556 East Colorado Boulevard that would be approximately 110,000 square feet. These projects are not within the immediate vicinity of the Project site and are not within sight lines of the Project and would therefore not affect the visual character of the area. These related projects would neither add to the light and glare emanating from the project nor affect mountain views or nighttime vistas. Accordingly, Alternative 7 as proposed does not have an incremental effect that is</p>

	<p>cumulatively considerable with regard to aesthetics. With regard to subsequent approvals to follow, the City's General Plan, Urban Design Principles, Design Guidelines and Zoning Ordinance provide a variety of standards, regulations and guidelines specifically intended to ensure that visual impacts from new cumulative development projects are minimized and that projects are designed and constructed in accordance with the City's aesthetic vision. As Alternative 7 moves forward, it will be required to comply with these policy and regulatory documents, in combination with the City's Design Review process. This subsequent review would ensure attainment of the City's objectives with respect to aesthetic conditions and ensure cumulative aesthetic impacts remain less than significant/not cumulatively considerable.</p>
--	---

**4.2 AIR QUALITY**

**AQ-1: Would Air pollutant emissions generated by construction of the project exceed SCAQMD thresholds for NOx, CO, SO2, or PM10 or PM2.5?**

The majority of construction-related emissions result from grading, soil hauling and building, due to use of heavy equipment, soil transport trucks, and architectural coatings, respectively. Construction of the Proposed Project assumes demolition of 9,482 sf of existing use and excavation for the subterranean garage with soil export of 35,500 cubic yards (CY) of soil. Proposed Project Scenario 2 further assumes 64,600 sf of new church support uses including the youth recreation use within Building E. As indicated in EIR Table 4.2-5, emissions would not exceed SCAQMD construction thresholds or LSTs. Therefore, temporary construction-related impacts would be Class III, less-than-significant.

As described on Draft EIR page 4.2-5 the air quality analysis for construction and operation was based in part upon "the amount of demolition, grading and building...operational emissions are associated with trip generation resulting from the project." Because the development intensity would be reduced under Alternative 7 in comparison to the Proposed Project (reduction of 1,692 GSF), air quality impacts associated with both construction and operation of this alternative would be slightly reduced in comparison to scenario 2 for the Proposed Project. As with the Proposed Project, air pollutant emissions generated by construction of Alternative 7 would not exceed SCAQMD thresholds for ROG, NOx, CO, SO2, or PM10 or PM2.5 during



	<p>construction (Impact AQ-1). Therefore temporary construction-related impacts would be Class III, less-than-significant.</p>
<p><b>AQ-2: Would Demolition of existing structures release asbestos into the environment? And Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</b></p>	<p>The Proposed Project includes demolition of a 1,487 sf commercial building, Scott Hall (6,190 sf), and a trailer that is currently used for office and meeting space. In addition, the Proposed Project includes renovations to portions of the Rectory and the Regas House. One or more of these structures could have asbestos containing materials (ACM). Asbestos could pose a health hazard if it is released into the air during demolition activities.</p> <p>Removal of any asbestos would require compliance with all pertinent existing rules and regulations, including SCAQMD Rule 1403 (Asbestos Demolition and Renovation Activities). This rule requires the applicant to notify the SCAQMD of the intent to perform demolition or renovation of any buildings that may contain asbestos prior to demolition and requires that asbestos containing material is removed prior any demolition that would break up, dislodge, or disturb the material.</p> <p>Under SCAQMD Rule 1403, the requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings. This rule, in whole or in part, is applicable to owners and operators of any demolition or renovation activity, and the associated disturbance of asbestos-containing material, any asbestos storage facility, or any active waste disposal site. Impacts would therefore be would be Class III, less-than-significant.</p> <p>As described on Draft EIR page 4.2-5 the air quality analysis for construction and operation was based in part upon “the amount of demolition, grading and building... operational emissions are associated with trip generation resulting from the project.” Because the development intensity would be reduced under Alternative 7 in comparison to the Proposed Project (reduction of 1,692 GSF), air quality impacts associated with both</p>

	<p>construction and operation of this alternative would be slightly reduced in comparison to scenario 2 for the Proposed Project. Existing regulations regarding asbestos and lead-based paint (15 USC § 2682; 40 CFR Part 745, and 8 Cal. Code Regs. Section 1532.1) would ensure that Alternative 7 would have less-than-significant impacts during demolition, the same as with the Proposed Project (Impact AQ-2). Impacts would therefore be would be Class III, less-than-significant.</p>
<p><b>AQ-3: Would operation of the project generate air pollutant emissions that exceed SCAQMD operational significance thresholds?</b></p>	<p>Operation of the Proposed Project would generate air pollutant emissions, but emissions would not exceed SCAQMD operational significance thresholds under either scenario. Therefore, the Proposed Project’s operational impact to regional air quality would be Class III, less than significant.</p> <p>As described on Draft EIR page 4.2-5 the air quality analysis for construction and operation was based in part upon “the amount of demolition, grading and building...operational emissions are associated with trip generation resulting from the project.” Because the development intensity would be reduced under Alternative 7 in comparison to the Proposed Project (reduction of 1,692 GSF), air quality impacts associated with both construction and operation of this alternative would be slightly reduced in comparison to scenario 2 for the Proposed Project. As with the Proposed Project, air pollutant emissions generated by construction of Alternative 7 would not exceed SCAQMD thresholds for ROG, NOx, CO, SO2, or PM10 or PM2.5 during operations (Impact AQ-3). Therefore, impacts would be Class III, less-than-significant.</p>
<p><b>AQ- Cumulative (including Greenhouse Gas Emissions–Would the Project exceed 10,000 metric tons CDE/year? And would the Project be inconsistent with CAT Strategies or the</b></p>	<p>Air Quality:</p> <p>As discussed in Section 4.2.2 of the Draft EIR a significant adverse air quality impact may occur when a project individually <i>or cumulatively</i> interferes with progress toward the attainment of the ozone standard by releasing emissions that equal or exceed the established long-term (operation) or temporary (construction) quantitative thresholds for pollutants, or causes an exceedance of a state or federal ambient air quality standard for any criteria pollutant. Table 4.2-3 lists the Project and cumulative significance thresholds recommended by the SCAQMD for project operations within the South Coast Air Basin. As noted for Impacts AQ-1 through AQ-3, there would be no impacts</p>

**AG Greenhouse Gas Reduction Report?)**

under the cumulative thresholds.

As discussed in the 2007 SCAQMD AQMP, under Cumulative Conditions, "Over the years, the air quality in the Basin has improved significantly, thanks to the comprehensive control strategies implemented to reduce pollution from mobile and stationary sources. For instance, the total number of days on which the Basin exceeds the federal 8-hour standard has decreased dramatically over the last two decades from about 150 days to less than 90 while Basin station-days [detail follows] decreased by approximately 80 percent." (Page ES-3.)

Furthermore, as described on Draft EIR page 4.2-9, the South Coast Air Basin is a non-attainment area for federal and state standards for ozone and PM10. Attainment and maintenance plans for the Federal CO threshold was approved by the US EPA on June 11, 2007. Approximately 1.2 million square feet of non-residential development and two thousand dwelling units are planned and pending in the site vicinity. Any growth within the Los Angeles metropolitan area contributes to existing exceedances of ambient air quality standards when taken as a whole with existing development in the region. However, every new development project is evaluated independently for its adverse effects to air quality. Emissions associated with this development, in combination with other development throughout the South Coast Air Basin, would incrementally contribute to the degradation of regional air quality. However, it is anticipated that each development contained in the cumulative project list (Table 3-1) would undergo evaluation for air quality impacts at the project level, thereby incorporating mitigation to reduce impacts to the greatest extent feasible. As discussed in Impact AQ-3, emissions associated with Proposed Project operation would be well below SCAQMD thresholds. Therefore impacts would be less than significant/not cumulatively considerable.

Alternative 7 is similar to Scenario 2 analyzed in the EIR, but is smaller and does not include senior residential housing. Therefore, Alternative 7 will not result in a substantial incremental effect to the cumulative increase in air pollutant emissions and will not make a cumulatively considerable contribution to a significant impact on ambient air quality standards.

Greenhouse Gases and Global Climate Change:

*Area Source Emissions.* This category includes emissions from consumption of electricity and natural gas as part of building operation and heating/cooling. Operation of the Proposed Project would consume an estimated 264,480 kilowatt-hours [kWh]/year of electricity under Scenario 2 (refer to Table 4.2-8). The electricity that is used at the site is generated at offsite power plants, and is primarily produced by the combustion of fossil fuels, which yields mostly CO<sub>2</sub>, and to a smaller extent N<sub>2</sub>O and CH<sub>4</sub>. GHG emissions from the generation of electricity were calculated using emissions factors from the CCAR General Reporting Protocol. CO<sub>2</sub> emission estimates using the URBEMIS model also take into account emissions from operational sources such as natural gas used for space heating. Table 4.2-9 shows the area source emissions of GHGs associated with the Proposed Project, estimated 194 metric tons of CDE per year for Scenario 2.

*Emissions from Mobile Combustion.* Mobile source GHG emissions were estimated using the average daily trips estimate from the traffic study to calibrate trip generation numbers used in the URBEMIS 2007 model (v. 9.2.4), which was used to derive the total annual vehicle miles traveled. Table 4.2-10 shows the estimated mobile emissions of GHGs based on this VMT. Emissions from mobile sources are estimated at 1,575 MT CDE per year under Scenario 2.

*Combined Stationary and Mobile Source Emissions.* Table 4.2-11 combines the operational and mobile GHG emissions associated with the proposed development, which would total approximately 1,769 MT CDE per year under Scenario 2. The total emissions for Scenario 2 represent about 0.0004% of California's total 2006 emissions of 480 million metric tons. These emission projections indicate that the majority of the Proposed Project GHG emissions are associated with vehicular travel (80-90%). It should be noted that mobile emissions are in part a redirection of existing travel to other locations, and so may already be a part of the total California GHG emissions.

CDE emissions associated with the Proposed Project would be

	<p>less than 10,000 tons/year, and the Proposed Project would be consistent with CAT Strategies and the AG Greenhouse Gas Reduction Report as discussed in Draft EIR Table 4.2-13. Therefore impacts would be less than significance/not cumulatively considerable.</p> <p>As described on Draft EIR page 4.2-5 the air quality analysis for construction and operation was based in part upon “the amount of demolition, grading and building... operational emissions are associated with trip generation resulting from the project.” Because the development intensity would be reduced under Alternative 7 in comparison to the Proposed Project (reduction of 1,692 GSF), air quality impacts associated with both construction and operation of Alternative 7 would be slightly reduced in comparison to scenario 2 for the Proposed Project. Therefore, impacts would be less than significant/not cumulatively considerable.</p>
<p><b>4.3 HISTORIC RESOURCES</b></p>	
<p><b>HR-1: Would the project cause a substantial change in the significance of an historical resource?</b></p>	<p>This analysis pertains to Scott Hall, the Regas House, and the Rectory building. The Proposed Project would result in the demolition of Scott Hall and the removal of the steel space frame and cupola structure located between Regas House and the Rectory building. The demolition is a less than significant impact since Scott Hall is not considered an historic resource, and the cupola structure is not original to Regas House or the Rectory, and its removal will return the space between those structures to their original condition. Therefore, impacts would be would be Class III, less-than-significant.</p> <p>Development of Alternative 7 also requires the demolition of Scott Hall, and steel framing and a copula structure between the Regas House and the Rectory Building. This impact would be the same as that identified for the Proposed Project (Impact HR-1). Therefore, impacts would be would be Class III, less-than-significant.</p>
<p><b>HR-2: Would the project cause a substantial change in the</b></p>	<p>Alternative 7 eliminates the relocation of the Maryland Hotel Wall included in the Proposed Project and would therefore avoid the Proposed Project’s Class I, significant unavoidable impact (Impact HR-2) related to the physical damage resulting from the</p>

<p><b>significance of an historical resource (Maryland Hotel Wall)?</b></p>	<p>relocation (demolition and reconstruction) of the Maryland Hotel Wall.</p> <p>While Building A under this alternative would be constructed slightly closer to the Maryland Hotel Wall in comparison to the Proposed Project (see Figure # 8.1-1), the existing spatial relationship for the Maryland Hotel Wall to its immediate surroundings is not considered historic; all of the nearby buildings to which it was historically related having been demolished several decades ago. Building A would be approximately eight feet from the Maryland Hotel Wall; the cast stone and metal screen would be approximately five feet from the wall. The existing setting does not currently include a historic garden setting as suggested by comment letters, but rather the existing setting contains a playground, a storage building, and a trailer immediately to the east, a paved parking lot to the north, and the Rectory building to the South (the east side of the wall is not currently accessible to the public as shown in Figure 4.3-2). Impacts would therefore be less than significant under Impact HR-2. Therefore, mitigation measures HR-2(a) and HR-2(b) would not be required under this alternative. Therefore, impacts would be would be Class III, less-than-significant.</p>
<p><b>HR-3: Would the project cause a substantial change in the significance of an historical resource (Civic Center Historic District/NRHP District)?</b></p>	<p>The Project site is located within the boundaries of the Pasadena Civic Center District listed on the NRHP in 1980 on the basis of a nomination prepared by Pasadena Heritage in 1978-79. The Project site was only later added in an addendum to the NR district nomination.</p> <p>According to the original NRHP nomination, the Civic Center Historic District's primary significance lies in its design, as a "nationally significant example of civic art in the City Beautiful style of the 1920's. The main features of the plan were actually executed, and the key buildings (including City Hall) actually built, by nationally recognized architects in a homogeneous style." (Pasadena Heritage, 1978.) These Buildings were based upon a plan prepared by Bennett, Parsons, Frost and Thomas of Chicago in 1923 ("Bennett Plan"), the successor to the Daniel</p>

Burnham firm, one of the principal founders of the City Beautiful urban design movement in America. The Bennett Plan<sup>4</sup> established a monumental City Beautiful urban design scheme organized around major view axes along Garfield Avenue and Holly Street. The Bennett Plan identified “proposed public buildings with their approaches” but did not address potential development for private property, such as the All Saints Project Site.

The Bennett Plan was never fully implemented, but did result in the construction of the anchor buildings completing the primary axial scheme, including the Central Library (1925) at the head of Garfield Avenue on Walnut Street, Pasadena City Hall (1927) on Garfield and Holly streets, and the Civic Auditorium (1931) at the south end of Garfield Avenue on Green Street, as well as the Southern California Gas Building (1929), all designed by leading architects of the period, selected by means of architectural competitions, in the Beaux Arts modes of the Mediterranean and Renaissance period revival styles. City Hall, with its prominent rotunda at the intersection of Garfield Avenue and Holly Street, was intended as the architectural focal point of the grouping.

The Project Site is in fact east of all of the “proposed public buildings” in the Bennett Plan. The addendum which added the Project Site presents no period of significance, and no historic contextual justification for adding in the existing All Saints Church complex and associated resources, other than to state that the buildings “contribute to the tone and scale of the district, on its perimeters.”

The primary location of proposed construction, north of the existing All Saints Church, primarily contains a surface parking lot, as well as several additional structures, such as a storage building, playground trailer, Maryland Hotel Wall, and a

---

<sup>4</sup> The Bennett Plan is not an officially adopted Land Use and Planning document under the Government Code or the Municipal Code. The elections related to the Bennett Plan (i.e. the two ballot measures) were for bond finance and acquisition, construction, and completion of the “civic group of buildings.” These buildings included the City Hall, library, municipal auditorium, and an art center in Carmelita Park. The bond was to fund construction of these buildings and to create the axial boulevards with vistas of the buildings. Resolution 4554 and Ordinance 2116 (dated May 18, 1923 and May 24, 1923) authorized the ballot measure for the “municipal improvements.” (See Final EIR Response to Comment D7.1 for further details.)

commercial building, described in greater detail in Final EIR Section 8.3 (Revised Section 4.3).

Impacts under CEQA are made in comparison to the existing physical conditions. (See CEQA Guidelines Section 15125(a).) The only contributing resource to the Historic District, in the primary location of construction, is the Maryland Hotel Wall which no longer retains a historic spatial relationship to its immediate surroundings. The only existing relationship of the Maryland Wall is its general inclusion within the geographic boundaries of the historic district and general proximity to the Maryland Arms Apartments located approximately 400 feet south of the wall. Neither of these relationships would be altered by Alternative 7.

Furthermore, the size, massing, proportions, bulk and scale of Alternative 7 are consistent with the size, massing, proportions, bulk and scale of the buildings contributing to the NRHP District. The proposed buildings along N. Euclid Avenue are low in scale, related to the massing, bulk and scale of nearby contributing buildings within the district, and are physically detached from the All Saints Church complex. The proposed buildings are aligned with the street setback of the Rectory building. The proposed larger-scale buildings are located at the rear (eastern) edge of the project site, adjacent to the 13-story Plaza Las Fuentes complex to the east, the six-story County Court Building to the west and the five to seven-story Kaiser Permanente buildings about a half block to the north" (DEIR page 4.1-13, 4.1-16, and 4.1-20) and to the north on E. Walnut Street. Further, Alternative 7 also fills an existing void on the street which was created in part by the removal of the Maryland Hotel bungalows.

While Final Design Review is not required at this time pursuant to Pasadena Municipal Code Section 17.61.030, the EIR made several reasonable assumptions about different materials relating to project design, based upon the application submittals. This approach is consistent with Public Resources Code 21080(e) and CEQA case law which permit the use of reasonable assumptions. (See *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018 ["A public agency can make reasonable assumptions based on substantial evidence about future conditions without



	<p>guaranteeing that those assumptions will remain true..."].) These assumptions were discussed in the RDEIR Project Description, Pages 2-4 through 2-5 and considered in this impact analysis. The level of detail provided in the analysis is consistent with the requirements of CEQA. (See <i>Dry Creek Citizens Coalition v. County of Tulare</i> (1999) 70 Cal.App4th, 20.) While Design Review is not relied upon in this analysis as mitigation, this process ensures that impacts remain less than significant as Alternative 7 moves forward. (See <i>Bowman v. City of Berkeley</i> (2004) 122 Cal.App.4th 572, 594.)</p> <p>Alternative 7 would offer improvements in comparison to the existing physical conditions on site, which include a surface parking structure, and several one story structures which do not match the size, massing, and scale of the surrounding structures (See DEIR Section 2.3, Figure 4.1-2 Photos A, B, and C, and DEIR Appendix D, Photo 2).</p> <p>For all the reasons described above and in the FEIR, impacts to the Civic Center Historic District would be Class III, less than significant.</p>
<p><b>HR-Cumulative</b></p>	<p>As identified in Impacts HR-1 and HR-3, implementation of the Project would not result in significant impacts. As discussed under Impact HR-2, above, the existing spatial relationship of the Maryland Hotel Wall to its immediate surroundings is not considered historic because all of the nearby buildings to which it was historically related have been demolished, nor does the Project (Alternative 7) require relocation of the Maryland Hotel Wall. No other projects on the list are proposed in the Civic Center District that may or may not have cumulative impacts to the District. The geographic scope of vibrational impacts (HR-4) is very limited, given the rate of vibrational attenuation. Even for the most intensive vibration activity on site (vibrational rollers), vibration levels would be measured at .210 (in/sec) at 25 feet, which would not exceed to the significance threshold of .25 (in/sec) for historic structures. (See EIR Table 4.3-2.) Therefore, the geographic scope would be generally limited to approximately 25 feet, given the rapid rate of vibrational attenuation, and there are no reasonably foreseeable projects which would result in vibrations within this distance. Therefore, the project's contribution to the potential cumulative impacts to</p>

	<p>the historic character of Pasadena under HR-1 through HR-4 would be less than significant/not cumulatively considerable. In addition, continued compliance with state and federal historic preservation guidelines, as well as City requirements, would address the potential for impacts associated with future individual projects on a case-by-case basis.</p>
<p><b>4.4 TRANSPORTATION/PARKING</b></p>	
<p><b>T-1: Would the Project incrementally increase traffic operational levels at analyzed intersections based upon the Criteria listed in EIR Table 4.4-6?</b></p>	<p>As shown in Table 4.4-11, all of the study area intersections would operate at LOS C or better for Proposed Project Scenario 2. Proposed Project V/C increases range from a net decrease (-0.010) during the AM peak hour at Euclid Street and Union Street to a high of 0.027 during the PM peak hour at Los Robles Avenue and Walnut Street. Given the existing LOS B at Los Robles Avenue and Walnut Street intersection, the maximum increase of 0.027 at this location does not exceed the City's threshold of 0.05 or more. Similarly, given the range of V/C increases at each of the other intersections and the existing LOS of A to B, there are no V/C increases that exceed the City's thresholds. Therefore the traffic impacts at study area intersections would be Class III, less than significant. Since the buildout square footage and development density of Alternative 7 would be slightly less than that of scenario 2 for the Proposed Project (1,692 GSF reduction in comparison to Scenario 2 for the Proposed Project), this alternative's transportation impacts would also be slightly less than those of scenario 2 for the Proposed Project. This is, in part, because trip generation assumptions are based upon the ITE Trip Generation rates, which vary based upon the square footage of the project (see Draft EIR Appendix C, Tables 7 which corresponds to the detailed calculations for the Proposed Project scenario 2). The Final EIR concludes that these revisions would improve the traffic conditions in comparison to the Proposed Project. Impacts for Alternative 7 would be Class III, less than significant.</p>
<p><b>T-3: Would the Project cause a deficiency in parking or would an individual project provide</b></p>	<p>Parking utilization surveys were performed by Raju Associates from 9:00 AM to 3:00 PM on a weekday (Thursday, January 31, 2008), and on a Sunday (February 3, 2008) to assess occupancy of the overall parking supply. The future peak parking demand for Proposed Project Scenario 2 was estimated to be 171 spaces on a weekday and 618 spaces on Sunday.</p>

<p><b>inadequate parking for the specific use at that site?<sup>5</sup></b></p>	<p>The overall off-street supply available for the Church is 178 spaces on a weekday and 1,128 spaces on a Sunday. Under Scenario 2, the Proposed Project would have a peak utilization rate of 96% during the weekday and 55% on a Sunday (Table 18 of the traffic report in Appendix C). Based on projected parking demand, the Church would have a surplus of seven (7) spaces on weekdays and 510 spaces on a typical Sunday. The Project (Alternative 7) is similar to Scenario 2 analyzed in the EIR, but is smaller and would have the same or slightly reduced parking demand and does not include senior residential housing. Impacts would therefore be Class III, less than significant.</p>
<p><b>T-4 (Sunday-Cumulative): Would the Project incrementally increase traffic operational levels at analyzed intersections based upon the Criteria listed in EIR Table 4.4-6?</b></p>	<p>Related project traffic volumes for the Sunday mid-day peak hour are shown in EIR Figure 4.4-11. The Cumulative (2013) Plus Proposed Project with Scenario 2 peak hour Sunday traffic volumes were analyzed to determine the volume to capacity (V/C) ratio and LOS at each of the analyzed intersections. The results of this analysis are summarized in EIR Table 4.4-17. Table 4.4-17 indicates that during the mid-day peak hour, the increase in traffic resulting from the addition of the Proposed Project with Scenario 2 traffic does not change the level of service (LOS) at any of the nine study intersections compared to Cumulative (2013) without Project conditions and would not trigger the thresholds in EIR Table 4.4-6. The Project (Alternative 7) is similar to Scenario 2 analyzed in the EIR, but is smaller and would have the slightly reduced trip generation. The impacts with respect to intersection level of service for Alternative 7 on Sunday are Class III, less than significant.</p>
<p><b>T-5: Would the Project generate</b></p>	<p>The nearest CMP arterial monitoring intersection to the project site is the intersection of Arroyo Parkway and California</p>

<sup>5</sup> A shortfall in parking spaces is not considered an environmental impact for the purposes of CEQA. In *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656, 697, the Court of Appeal stated that "parking deficits are an inconvenience to drivers, but not a significant *physical impact on the environment*." (Emphasis in original.) The CEQA Guidelines Appendix G has also recently been revised to remove parking from the Initial Study Checklist, as noted in the Statement of Reasons for Regulatory Action, which amended the CEQA Guidelines. (Page 96-97, Available at <http://ceres.ca.gov/ceqa/guidelines/>.) Despite these clarifications to CEQA, the DEIR and these Findings addressed impacts to parking and determined such impacts would be less than significant.

<p><b>trips exceeding Congestion Management Plan criteria at CMP locations? (Criteria listed on EIR page 4.4-47)</b></p>	<p>Boulevard. Based on the incremental trip generation estimates presented in EIR Table 4.4-5, the project is not expected to add 50 or more new trips per hour to this location under Proposed Project Scenario 2.</p> <p>The nearest mainline freeway monitoring locations to the project site are the I-210 Freeway west of SR-134 and at Rosemead Boulevard. Based on the incremental project trip generation estimates presented in Tables 4.4-5, the Proposed Project would not add 150 or more new trips per hour to these locations in either direction under Proposed Project Scenario 2. The Project (Alternative 7) is similar to Scenario 2 analyzed in the EIR, but is smaller and would have the slightly reduced trip generation. Impacts would therefore be Class III, less than significant.</p>
<p><b>T- Cumulative</b></p>	<p>Currently, all nine of the analyzed intersections are operating at LOS B or better during the morning and evening peak hours. During the Sunday mid-day peak hour, all intersections are operating at LOS A. Traffic from related/area projects (projects planned or pending construction or completion) was added to future ambient traffic growth to create the cumulative scenario. As indicated in Table 3-1, in Section 3.0, Environmental Setting, about 1.2 million sf of non-residential development and 2,000 dwelling units are planned and pending in the project site vicinity. Pursuant to the City's methodology and practice, cumulative impacts are assessed based on intersection operations. As shown in Tables 4.4-10, 4.4-11, 4.4-16 and 4.4-17, which summarize the level of service analysis conducted for Proposed Project, traffic would incrementally increase with cumulative + project traffic, but significant impacts would not occur at any study area intersections. In the cumulative (2013) without project conditions, all nine of the analyzed intersection locations are projected to operate at LOS C or better during the morning and evening peak hours. During the Sunday mid-day peak hour, all study intersection locations are projected to continue to operate at LOS A. Therefore, cumulative impacts would be less than significant/not cumulatively considerable.</p> <p>As noted above, since the buildout square footage and development density of Alternative 7 would be slightly less than that of scenario 2 for the Proposed Project (1,692 GSF reduction</p>

	<p>in comparison to Scenario 2 for the Proposed Project), Alternative 7's transportation impacts would also be slightly less than those of scenario 2 for the Proposed Project. Therefore, cumulative impacts would be less than significant/not cumulatively considerable.</p>
<p><b>4.5 Water Supply</b></p>	
<p><b>W – Cumulative</b></p>	<p>Since 1990, new connections have been added at a rate of approximately 0.15 percent per year. However, demand for water has remained relatively constant with the implementation of water efficiency improvements. The Project (Alternative 7), in conjunction planned and pending development, including 1,833 residences and just over 1 million square feet of nonresidential development (see Table 3-1 in Section 3.0, Environmental Setting) would create additional demand for water. Using the City's standard generation rates, and assuming that the non-residential uses are composed of 30% office, 30% specialty retail, 30% institutional, and 10% restaurant, cumulative development would demand about 458,000 gallons/day or about 513 acre-feet/year. However, water supplies are adequate over a 20-year planning horizon in single dry year, multiple dry year and average years to serve projected development increases. It is noted that there may be periods when local and regional plans to curtail water usage (see EIR Section 4.5.1) are implemented to offset reduced supplies during shortage periods. However, these conservation programs in addition to plans and policies at the regional and local level, in addition to development of additional diversified supplies are part of the evolving strategy to continue meeting increasing water demands in the future. New developments would implement conservation in accordance with the City's goal of increasing water conservation by 20% by 2020, therefore cumulative impacts to water service would be less than significant/not cumulatively considerable.</p>
<p><b>4.6 LAND USE PLANNING</b></p>	
<p><b>LUP-1: Would the Project Conflict with any</b></p>	<p>Scenario 2 of the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Proposed Project, adopted for the purpose</p>

<p><b>applicable land use plan, policy, or regulation of an agency with jurisdiction over the project, adopted for the purpose of avoiding or mitigating an environmental effect?</b></p>	<p>of avoiding or mitigating an environmental effect. Scenario 2 of the Proposed Project would not conflict with the City of Pasadena's General Plan, Central District Specific Plan, or Zoning Ordinance for the reasons discussed under Impact LU-1 in the EIR. Scenario 2 of the Proposed Project layout implements the objectives of the Specific Plan to provide active uses and a comfortable pedestrian environment along the street edge. The site plan has already been modified in response to direction from the Planning Commission and Design Commission. The Project (Alternative 7) is similar to Scenario 2 analyzed in the EIR, but is smaller, does not include senior residential housing, has a smaller size and location for Building A, and a smaller size for Building E. These variations from the Proposed Project will not result in conflict between the Project (Alternative 7) and any applicable land use plan, policy, or regulations of any agency with jurisdiction over the project, including those identified above. Therefore, the Project (Alternative 7) will not cause any significant land use impacts and the impact would be Class III, less than significant.</p>
<p><b>LUP-Cumulative</b></p>	<p>As indicated in Table 3-1, in Section 3.0, Environmental Setting, about 1.2 million sf of non-residential development and two thousand dwelling units are planned and pending in the site vicinity. The Proposed Project is consistent with the General Plan of the City of Pasadena which is the long-term planning document for the City. The Proposed Project does not require an amendment to the Land Use Element of the General Plan nor does it require changes to the zoning map. The Proposed Project would occur in two phases with the North Building being constructed after the three other buildings are complete. These buildings may be constructed at the same time that other related projects would occur. Although other related projects contribute to overall density and intensity of development, the Proposed Project is consistent within the intensity and density anticipated in the City's General Plan and the implementing Central District Specific Plan and zoning ordinance. Other related projects are required to be consistent with these applicable land use plans as well, and therefore there is not a cumulatively considerable land use impact arising from the list of projects (see Table 3-1). The Project (Alternative 7) is similar to Scenario 2 analyzed in the EIR, but is smaller, does not include senior residential housing,</p>

	<p>has a smaller size and location for Building A, and a smaller size for Building E. These variations from the Proposed Project will not result in conflict between the Project (Alternative 7) and any applicable land use plan, policy, or regulations of any agency with jurisdiction over the project, including those identified above. Thus, the Project's incremental effect on land use is less than significant/not cumulatively considerable, and the Project would not result in potentially significant cumulative land use impacts.</p>
--	---

**INITIAL STUDY – ADDITIONAL IMPACTS FOUND TO BE LESS THAN SIGNIFICANT**

	<p>As discussed in EIR Section 5.4, numerous resource areas and significance thresholds were determined to be less than significant in the Initial Study. Therefore, additional detailed analysis was not warranted in the EIR. A copy of the Initial Study was included in the EIR (EIR Appendix A), consistent with CEQA Guidelines Sections 15063(c)(3)(A) and 15128. Please see EIR Appendix A for further details on these analyses.</p> <p>These thresholds were reviewed under the Alternative 7 analysis, and would be the same or slightly reduced for Alternative 7 in comparison to the Proposed Project, therefore additional detailed analysis was not warranted (CEQA Guidelines Section 15151 and 15130(b)). These impacts would remain less than significant.</p>
--	---

**I.4.2 Findings of Significant Environmental Impacts That Can Be Reduced to a Less than Significant Level (Class II)**

The Commission finds that the following environmental impacts can and will be mitigated to below a level of significance based upon the implementation of the mitigation measures in the EIR. These findings are supported by discussion of these impacts in the EIR, which should be read in conjunction with these findings, including the detailed issue area analyses in Sections 4.1, 4.3, 4.4 and 4.5 of the EIR; the Final EIR, including the Alternative 7 impact analysis provided in Final EIR, Section 8.2, General Response #3. An explanation of the rationale for each finding is presented below.

- **Aesthetics**

**Threshold AES-3: *Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***

**Finding.** The City Council finds that changes or alterations have been incorporated into the Project which avoid and substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, the follow mitigation measures would reduce Impact AES-3 to a less than significant level.

**AES-3 (a) Glare Minimization.** To minimize the amount of glare associated with the glass ceiling of Building B, the exterior glass shall have low reflectivity. Compliance with the intent of reducing glare shall be determined during the design review process. The project contractor shall submit a report to the Planning Director verifying installation of the material specified.

**AES-3 (b) Light Spillover Minimization.** To minimize the amount of light spillover that emanates from the site onto surrounding properties and into the night sky, the following shall be implemented in the project design. Compliance with the intent of minimizing light spillover shall be determined during the design review process. The project contractor shall submit a report to the Planning Director verifying installation of the material specified.

- A lighting plan shall be prepared that shows All Saints Campus lighting is of a pedestrian scale, highlighting landscape and pedestrian scaled features, and that is downcast, minimizing light spillover to surrounding properties. Maximum horizontal and vertical illuminance shall be 0.05 foot-candle at 15 feet from the site boundary (LEED ND GIB Credit 17: Light Pollution Reduction).
- Full illumination of the Forum Building (Building B) shall only occur during events and architectural or landscape lighting throughout the All Saints Campus shall be reduced during



nonoperational hours of the night to save energy and minimize light spillover.

- Security lighting shall be triggered by sensors to the extent feasible and practicable.

**Rationale for Finding.** The Project site is located within a high activity commercial district in a major metropolitan area. In general, light emanating from a typical urban site at night could be associated with windows, landscape and pathway lighting, as well as security lighting and parking lot lighting. These urban light sources affect the nighttime views of the sky. Light emanating from windows of Building A, Building C and Building E under either Scenario (see Figure 4.1-4 and Figure 4.1-5) would be typical of urban development with windows interrupting a solid façade. Building A would also have a reverse pattern whereby a large glass expanse on the southwestern corner of the building would be broken by copper mesh panels, thus repeating a pattern of light and dark as seen at night. Building B could have light emanating from the top of the dome, as this is shown as glass on plans and in images. Implementation of Mitigation Measure AES-3(b) will ensure that a substantial amount of light would not adversely affect nighttime views by requiring a lighting plan with specific performance criteria.

Building B has a predominance of glass on the western façade and ceiling. The concrete parapet may restrict sunlight reflecting from the ceiling of Building B; however, the glass roof may prove to be a source of glare onto the Plaza Las Fuentes complex. While glass can be reflective, it is often not reflective in current usage because of high performance coatings that are applied to reduce heat gain, block ultraviolet light and maximize natural day lighting. A row of sycamore trees would screen reflected light from Building C, which is located along the interior of the site. In addition, given the urban context of the site, glare is not likely to affect daytime views in the area. Because of the predominantly low-scale building profiles in combination with the materials used for the proposed buildings, daytime glare would be reflected downward onto the project site and within the immediate vicinity of Euclid Avenue. Landscaping along Euclid Avenue will diffuse daytime glare. However, as discussed above, the Proposed Project may adversely affect the adjacent hotel and office uses due to creation of glare from Building B. Impacts under Alternative 7 would be the same as the Proposed Project.

Implementation of mitigation measure AES-3(a) will minimize the amount of glare associated with the glass ceiling of Building B by requiring exterior glass to have low reflectivity.

Therefore, impacts associated with increases in light and glare will be reduced a less than significant level (Class II). After mitigation, impacts would be less than significant.

**Reference.** EIR Section 4.1.2, Impact AES-3, Pages 4.1-21 through 4.1-27; Final EIR Section 8.2, General Response 3(C) (Alternative 7 Impact Analysis), page 8-12.

- **Historic Resources**

**Threshold HR-4:** *Would demolition of structures and project construction generate groundborne vibrations on and adjacent to the site which have the potential to affect historical resources?*

**Finding.** The City Council finds that changes or alterations have been incorporated into the Project which avoid and substantially lessen the significant environmental effect as identified in the final EIR. Specifically, the follow mitigation measures would reduce Impact HR-4 to a less than significant level (Class II).

**HR-4 Construction Vibration.** The applicant shall retain a structural engineer to prepare a detailed construction vibration reduction plan describing the activities to be performed during the demolition and construction phases. The report shall document methodology necessary such that the PPV 0.25 (in/sec) threshold is not exceeded. The PPV 0.25 (in/sec) threshold may be superseded based on structural integrity of the most sensitive/most affected historic resource as documented by the structural engineer. The vibration reduction report shall include but not be limited to the following.

- Construction equipment sizes, functions, & duration of activities
- Distances to the historic resources from construction activity
- Structural integrity of the historic resources
- Recommendations for vibration reduction strategies necessary to avoid damaging historic resources, including the Regas House, the Rectory, the Church, the Maryland Hotel Wall, and City Hall.

Prior to the start of demolition or construction, the applicant shall retain services of a structural engineer and an on-site conservator to monitor the demolitions and vibration and submit periodic reports to the Planning Director. The report shall address the procedures for vibration control. Vibration reduction strategies could be accomplished through the following.

- Limiting the size of equipment within 25 feet of the historical resources • Staging larger equipment further away
- Phasing demolition and excavation separately so that earthmoving and ground-impacting operations do not occur within the same time period.

During construction activities, the contractor shall implement vibration reduction controls in the plan as detailed by the structural engineer. Compliance with the vibration reduction plan will be monitored during construction by the project contractor and a compliance report shall be submitted to the Planning Director.

**Rationale for Finding.** Due to adjacency of some historic resources and close proximity of others including the Church and City Hall, construction generated vibration has the potential to damage historical structures, particularly the Rectory and the Regas House. Typical construction equipment that could be used for the Proposed Project includes water trucks, dump trucks, excavators, cranes, concrete pumping rigs, backhoes, compactors and rollers. Typical examples of vibratory damage include structural damage, such as cracking of floor slabs, foundations, columns, beams or wells, or cosmetic damage such as cracked plaster, stucco, or tile (Caltrans, 2004). Typical vibration levels from construction equipment likely to be used for the Proposed Project are shown in DEIR Table 4.3-2. Impacts under Alternative 7 would be the same as the Proposed Project.

Implementation of the measures outlined in HR-4 will ensure that the plan to reduce construction vibrations will be prepared by a qualified structural engineer with relevant expertise. Mitigation Measure HR-4 provides a number of methods of meeting this performance standard (0.25 in/sec), given various unknown construction factors which warrant some flexibility (i.e. unknown information on the day to day mix of construction equipment, duration and timing of activities, and unforeseen circumstances encountered on site). The plan will include recommendations for vibration reductions strategies to avoid damaging historic resources, and shall require periodic reports. Vibrations shall be kept below a specified threshold (PPV 0.25 (in/sec)) unless the structural engineer documents the structural integrity of the most sensitive/most affected historic resource to withstand a greater vibration level. Compliance with the plan will be established by periodic reporting. While minor revisions were recommended by Planning Commission and incorporated into Mitigation Measure HR-4, the mitigation measure HR-4 that was analyzed in the Draft EIR would be sufficient to reduce this impact to less than significant without the changes incorporated here. Nonetheless, the changes suggested are helpful, do not change the substantive analysis in the EIR, and are incorporated herein. Therefore, impacts to historic structures associated with