RESOLUTION NO. _____

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PASADENA CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT (SCH NO. 2013101060) FOR COLORADO HILL PLANNED DEVELOPMENT PROJECT, AND ADOPTING ENVIRONMENTAL FINDINGS AND A MITIGATION MONITORING AND REPORTING PROGRAM

WHEREAS, the Colorado Hill Planned Development Project (the "project") proposes the development of two noncontiguous parcels (comprised of multiple APN numbers), generally located at 1347-1355 East Colorado Boulevard and 39 North Hill Avenue (North Parcel) and at 1336 East Colorado Boulevard (South Parcel), with two structures totaling approximately 440,000 square feet.
The North Parcel would be developed with a full-service hotel within an approximately 350,000 square foot building. The hotel would include up to 375 guest rooms (approximately 312,000 square feet) and related services, a ballroom (approximately 12,500 square feet), conference rooms (8,890 square feet), and ground-floor commercial uses (approximately 16,400 square feet). The maximum floor area ratio (FAR) would be 2.70. The South Parcel would be developed with approximately 90,000 square feet. The hotel would include up to 150 guest rooms (approximately 80,000 square feet). The ground floor would be occupied by retail, restaurant, and other non-residential uses (approximately 10,000 square feet) consistent with the permitted uses within this area of the East Colorado Specific Plan. The maximum FAR would be 2.90. Approvals required for the Project include a Zone Map Amendment to change the zoning designation from ECSP-CG-2 and RM-48-PK to PD (Planned Development) and establishment of Planned Development zoning district, PD-35 (Colorado Hill Hotel). (This project description summary is only intended to provide a brief overview of the project as analyzed in the EIR; the associated entitlement resolution(s)/ordinance(s), Conditions of Approval, and the MMRP control the scope of the project as may be approved by the Council); and

WHEREAS, the City of Pasadena is the lead agency for the project pursuant to the California Environmental Quality Act ("CEQA," Cal. Pub. Res. Code §21000 *et seq.*), State CEQA Guidelines (the "Guidelines," 14 Cal. Code Regs. §15000 *et seq.*), and the City's local environmental policy guidelines; and

WHEREAS, pursuant to CEQA Guidelines Section 15063, the City prepared an Initial Environmental Study (the "Initial Study") for the project. The Initial Study concluded that the project might have a significant environmental impact on the following resource areas, and therefore additional analysis was warranted in an EIR: (1) Air Quality, (2) Cultural Resources, (3) Greenhouse Gases, (4) Hazards and Hazardous

Materials, (5) Hydrology and Water Quality, (6) Land Use and Planning, (7) Noise and Vibration, (8) Public Services (Fire), (9) Transportation and Traffic, and (10) Utilities and Service Systems. Although the Initial Study completed for the project identified the potential for significant impacts related to aesthetics, that issue was not carried forth into the EIR analysis based on the provisions of Senate Bill 743, codified within CEQA as Section 21099 et. seq., which states that "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." (Public Resources Code Section 21099(d) (1)).As outlined in the EIR, both the North Parcel and the South Parcel are located within a High Quality Transit Area that qualifies as a transit priority area, and the most current SCAG map of SB 743 Transit Priority Areas (TPAs) indicates the project site to be located within a TPA; and,

WHEREAS, pursuant to CEQA Guidelines Sections 15064 and 15081, and based upon the information in the Initial Study, the City ordered the preparation of an environmental impact report ("EIR") for the project. On October 18, 2013, the City prepared and sent a Notice of Preparation (NOP) of the Draft EIR and a copy of the Initial Study to responsible, trustee, and other interested agencies and persons in accordance with CEQA Guidelines Sections 15082(a) and 15375. Copies of the NOP and Initial Study were also made available for review at the City's Planning and Community Development Department at 175 North Garfield Avenue, at the Central Library at 285 East Walnut Street, and on the City's website; and

WHEREAS, pursuant to CEQA Guidelines Section 15082, the City solicited responses from potential responsible and trustee agencies, organizations and individuals for a 30-day period, from October 18, 2013 to November 18, 2013. The City requested details about the scope and content of the environmental information related to the responsible or trustee agency's area of statutory responsibility that should be studied in the EIR, as well as the significant environmental issues, reasonable alternatives and mitigation measures that the responsible agency would have analyzed in the Draft EIR. Two public scoping meetings were held on November 7, 2013 and November 13, 2013 to determine the scope and content of the environmental information to be included in the Draft EIR. Comments received during the scoping period are contained in Appendix A of the Draft EIR; and

WHEREAS, pursuant to Public Resources Code section 21092, the City provided a public Notice of Completion and Availability ("NOA") of the Draft EIR (State Clearinghouse No. 2013101060) on October 13, 2015 through mailing to all property owners within 500 feet of the Project. The NOA also gave notice of a public hearing (Planning Commission Hearing) on November 11, 2015 at which comments on the Draft EIR would be taken. Copies of the Draft EIR were also placed at the City's Planning

and Community Development Department at 175 North Garfield Avenue, at the Central Library at 285 East Walnut Street, at the Hill Avenue Branch Library, 55 S. Hill Avenue, and on the City's website; and

WHEREAS, the Draft EIR was circulated, together with technical appendices, to the public and other interested persons for a 67-day public comment period, from October 13, 2015 to December 18, 2015. During the comment period, the City held a duly noticed public meeting before the Planning Commission on November 11, 2015 at which the public was given the opportunity to provide oral comments on the Draft EIR; and

WHEREAS, during the aforementioned public comment periods the City received written and oral comments on the Draft EIR from individuals, organizations, and public agencies, and consulted with all responsible and trustee agencies, and other regulatory agencies pursuant to CEQA Guidelines Section 15086; and

WHEREAS, the City subsequently prepared written responses to all written comments received on the Draft EIR and made revisions to the Draft EIR, as appropriate, in response to those comments. The City distributed written responses to comments on the Draft EIR on April 13, 2016, in accordance with the provisions of Public Resources Code Section 21092.5. After reviewing the Final EIR, including comment and responses to comments, revisions to the Draft EIR (including the updates from August 2016), the City concludes that there has been no significant new information requiring recirculation of the EIR, as defined in CEQA Guidelines Section 15088.5; and

WHEREAS, the Final Environmental Impact Report (the "Final EIR" or "EIR") is comprised of: the Draft EIR including clarifications, revisions, and corrections thereto; comments and responses to comments on the Draft EIR set forth in the Final EIR originally dated April 2016 and updated in August 2016 with minor corrections; a list of persons, organizations and public agencies commenting on the Draft EIR; and any other information added by the lead agency pursuant to CEQA Guidelines section 15132; and

WHEREAS, the Design Commission reviewed and considered the project and its associated entitlement at a public hearing on March 22, 2016, and found that the conceptual drawings were of high quality and appropriately massed and sited to be contextually compatible with the surrounding neighborhood; and

WHEREAS, the City Planning Commission held three (3) duly noticed public hearings on the Final EIR and the Project on April 21, 2016, June 8, 2016, and July 27,

2016 to consider making a recommendation to the City Council regarding (1) certification of the Final EIR and adoption of the Mitigation Monitoring and Reporting Program, (2) approval of a Zone Map Amendment from ECSP-CG-2 and RM-48-PK to PD (Planned Development) with specified conditions of approval; and approval of PD 35 (Colorado Hill Hotel Planned Development) with specified conditions of approval; and (3) adoption of the Water Supply Assessment; and

WHEREAS, at the public hearing on July 27, 2016, the Planning Commission, in concurrence with City staff's recommendation, considered the proposed project and ultimately recommended to the City Council the actions described above; and

WHEREAS, the City Council held a duly noticed public hearing on the Final EIR and the project on September 12, 2016; and

WHEREAS, the findings made in this resolution are based upon the information and evidence set forth in the Final EIR and upon other substantial evidence that has been presented at all public meetings regarding the project and in the record of the proceedings. The documents, staff reports, technical studies, appendices, plans, specifications, and other materials that constitute the record of proceedings on which this resolution is based are on file and available for public examination during normal business hours in the Planning & Community Development Department at 175 North Garfield Avenue, Pasadena, California 91101 and with the Director of Planning & Community Development, who serves as the custodian of these records; and

WHEREAS, the City Council finds that agencies and interested members of the public have been afforded ample notice and opportunity to comment on the Final EIR and that the comment process has fulfilled all requirements of State and local law; and

WHEREAS, the City Council, as the decision-making body for the lead agency with regard to this project, has independently reviewed and considered the contents of the Final EIR and all documents and testimony in the record of proceedings prior to deciding whether to certify the Final EIR; and

WHEREAS, all other legal prerequisites to the adoption of this Resolution have occurred.

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.

THE CITY COUNCIL OF THE CITY OF PASADENA FURTHER RESOLVES AS FOLLOWS:

I. CERTIFICATION OF THE EIR

Pursuant to State CEQA Guidelines Section 15090, the City Council certifies that: (1) the Final EIR (including the revisions from August 2016 included in Attachment G of the Agenda Report) has been completed in compliance with CEQA, (2) the Final EIR was presented to the City Council of the City of Pasadena and that the City Council reviewed and considered the information contained in the Final EIR prior to approving the project, and (3) the Final EIR reflects the City of Pasadena's independent judgment and analysis. The City Council certifies the Final EIR based on the findings and conclusions therein. The City Council also hereby adopts the Water Supply Assessment included in Draft EIR, Appendix H.

The City Council finds that the additional information provided in the staff report (including the Staff Reccomendation for the project), the comments (and any responses thereto) received after circulation of the Draft EIR, in the evidence presented in written and oral testimony presented at public meetings, and otherwise in the administrative record, does not constitute significant new information requiring recirculation of the Final EIR under CEQA. The City further finds that the information contained in the Final EIR should be read in conjunction with this resolution and provides additional evidence to support the CEQA Findings in the subsequent subsections of this resolution.

II. CEQA FINDINGS ON ENVIRONMENTAL IMPACTS FROM THE INITIAL STUDY WHICH WERE NOT ANALYZED IN GREATER DETAIL IN THE EIR

The City Council hereby finds that the following impacts of the project were found to be less than significant in the Initial Study, did not require the imposition of mitigation measures, and therefore did not require study in the EIR: (1) Agricultural and Forestry Resources; (2) Air Quality (objectionable odors), (3) Biological Resources; (4) Cultural Resources (human remains), (5) Geology and Soils; (6) Hazards and Hazardous Materials (hazards related to routine transport, storage production, use, and disposal, and related to hazardous materials sites, public and private airports, and emergency response/evacuation plans), (7) Hydrology and Water Quality (groundwater, flood zones, seiche, tsunami, and mudflow), (8) Land Use and Planning (physical divide an established community, habitat conservation plan) (9) Mineral Resources; (10) Noise (located within two miles of a public airport or private airstrip), (11) Population and Housing; (6) Public Services (Police, Schools, Libraries, Parks); and, (12) Recreation, (13) Transportation (air traffic patterns, emergency access), (14) Utilities and Service Systems (wastewater treatment requirements, solid waste). Although the Initial Study

indicated that impacts related to Energy were not found to be significant, additional analysis related to energy was included within the Draft EIR. As discussed in Draft EIR Section 5.5, the project would not result in a wasteful, inefficient, or unnecessary consumption of energy.

Although the Initial Study completed for the project identified the potential for significant impacts related to aesthetics, that issue was not carried forth into the EIR analysis based on the provisions of Senate Bill 743, codified within CEQA as Section 21099 et. seq., which states that "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." (Public Resources Code Section 21099(d)(1)).

III. CEQA FINDINGS ON ENVIRONMENTAL IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT WITHOUT MITIGATION

The City Council finds that the proposed project will have no impact or a less than significant impact without mitigation on a number of environmental topics. For some of these topics, compliance with applicable regulatory requirements would ensure that impacts remain less than significant, as discussed in the EIR. Environmental topics determined to be no impact or less than significant without mitigation are listed below. For each topic, the discussion begins with a delineation of the impacts evaluated in the EIR, as specifically related to that topic, along with page citations as to where in the EIR the relevant discussion is found, and is followed by an explanation of the substantial evidence in support of the EIR conclusion that a significant impact would not occur.

a. Air Quality

i. Impacts Evaluated

- AIR-1: Would the project conflict with implementation of the applicable air quality plan? (Draft EIR, p. 3.2-14)

ii. Proposed Mitigation – None Required

iii. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the proposed project would not result in significant impacts related to

this aspect of air quality. As such, findings pursuant to CEQA Guidelines Section 15091 are not warranted.

iv. Supporting Explanation

The 2012 Air Quality Management Plan (AQMP) incorporates growth projections into its analysis of meeting regional ambient air quality standards; therefore, if a project can demonstrate that it is consistent with the growth forecast, then it would not conflict with implementation of the AQMP. The 2012 AQMP is based on growth projections included in the Southern California Association of Government's (SCAG's) adopted 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is based upon the SCAG Integrated Growth Forecast. The City is projected to have an employment population of 122,300 in 2017 (SCAG 2012). The most recent employment figures indicate that approximately 72,900 people were employed in the City in 2014 (EDD 2014). The hotels would add an estimated 2,067 employees and would not cause the growth projections in the 2012 AQMP and 2012-2035 RTP/SCS to be exceeded. As such, the proposed project would not conflict with the implementation of the adopted AQMP, and no significant impact would occur. (Draft EIR, p. 3.2-14)

b. Cultural Resources

i. Impacts Evaluated

- CR-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5? (Draft EIR, p. 3.3-34)

ii. Proposed Mitigation – None Required

iii. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the proposed project would not result in significant impacts related to this aspect of cultural resources. As such, findings pursuant to CEQA Guidelines Section 15091 are not warranted.

iv. Supporting Explanation

As described in Section 3.3.2.2 on pages 3.3-15 through 3.3-17 of the Draft EIR, no cultural resources sites other than structures on the project site itself were identified

in archaeological records. The proposed project site contains no known or recorded archaeological resources and the likelihood for unknown archaeological resources is low given the amount of disturbance that previously occurred on-site. Because of the built nature of the project site and previous disturbances related to construction of the site, it is unlikely that archaeological resources are present in the subsurface that would be disturbed by the project. Therefore, impacts are less than significant. (Draft EIR. P. 3.3-34)

c. Greenhouse Gases

i. Impacts Evaluated

- GHG-1: Would the reduction in GHG emissions from the proposed project be more than 15 percent below the BAU conditions? (Draft EIR, p. 3.4-14)

- GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs? (Draft EIR, p. 3.4-19)

ii. Proposed Mitigation – None Required

iii. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the proposed project would not result in significant impacts related to greenhouse gases. As such, findings pursuant to CEQA Guidelines Section 15091 are not warranted.

iv. Supporting Explanation

Construction emissions are expected to occur from engine exhaust from the off-road construction equipment and vehicle trips made by construction workers, vendors, and haul trucks. These emissions would primarily consist of carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). The construction-related CO2 equivalents ($CO2_e$) of these gases, combined, would total 3,665 metric tons (MT), which as amortized over 30 years, would equal 122 MT per year. (Draft EIR, p.3.4-15)

The estimated operational GHG emissions resulting from project implementation would be 2,587 $MTCO2_e$ per year, which when combined with the amortized construction GHG emissions, would total 2,709 $MTCO2_e$ per year. The total GHG

emissions would not exceed the South Coast Air Quality Management District's (SCAQMD's) efficiency threshold of 25,000 $MTCO2_e$ per year maximum net project emissions. The proposed project would have a net increase of 2,184 employees. Therefore, the per service population emissions would equal 1.2 $MTCO2_e$ per person annually. This would not exceed the SCAQMD's project level service population efficiency threshold of 4.6 $MTCO2_e$ per person annually. Therefore, the net increase in GHG emissions resulting from project implementation is less than significant. (Draft EIR, pp. 3.4-15 through 3.4-17)

Regarding consistency with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG, the Draft EIR found that the proposed project would not conflict with the relevant provisions of Assembly Bill (AB 32), the SCAG 2012-2035 RTP/SCS, or the Pasadena Green City Action Plan (Draft EIR, p. 3.4-19), as summarized below.

In general, California's goals and strategies for the systematic statewide reduction of GHG emissions are embodied in AB 32, which call for the following reductions of GHG emissions:

- 2000 levels by 2010 (11 percent below Business as Usual [BAU]); and
- 1990 levels by 2020 (16 percent below BAU).

GHG emission emissions from operation of the proposed project would be at least 16 percent less than a BAU scenario and, as indicated in Table 3.4-6 on page 3.4-18 of the Draft EIR, is estimated to be approximately 62 percent below the BAU scenario. As such, the proposed project's GHG emissions would not conflict with AB 32 and would have no impact.

Implementation of the SCAG 2012-2035 RTP/SCS would achieve GHG emission reductions through integrated land use and transportation planning. The proposed project involves construction of a full-service hotel with related spaces including retail space on the North Parcel; the South Parcel includes construction and operation of a hotel building that could include the addition of a quality restaurant. The proposed project would provide the following key feature relative to the SCS:

- Provide and locate new hotels within proximity of a major public transportation facility (the Metro Gold Line) to support public transportation throughout the area.
- Provide increased density of development within an existing urbanized area.

By developing a mixed use development within a transit-oriented district and close to the city center, the proposed project is consistent with the goals and requirements of the SCS, and the proposed project would have no impact.
As part of the 2006 Green City Action Plan (City of Pasadena 2006), the City adopted a Green Building Practices Ordinance (Pasadena Municipal Code, Chapter 14.90). Ordinance 7201 (2010) repealed Chapter 14.90 and adopted the 2010 CALGreen Code. The proposed project would be constructed in compliance with the California Green Building Standards Code (see Pasadena Municipal Code, Sections 14.04.500 – 14.04.578) and would not impede the implementation of the Green City Action Plan. Therefore, the proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs, and the proposed project would have no impact.

Cumulative Impacts

By its very nature, climate change is a cumulative impact from various global sources of activities that incrementally contribute to global GHG concentrations. Individual projects provide a small addition to total concentrations, but contribute cumulatively to a global phenomenon. The goal of AB 32 is to require GHG emission reductions from existing conditions. As a result, cumulative GHG and climate change impacts must be analyzed from the perspective of whether they would impede the state's ability to meet its emission reduction goals. As discussed above, impacts were determined to be less than significant and are therefore not cumulatively considerable. (Draft EIR, p. 3.4-20)

d. Hazards and Hazardous Materials

i. Impacts Evaluated

- HAZ-2: Would the proposed project emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school? (Draft EIR, p. 3.5-12)

ii. Proposed Mitigation – None Required

iii. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the proposed project would not result in significant impacts related to

this aspect of hazards and hazardous materials. As such, findings pursuant to CEQA Guidelines Section 15091 are not warranted.

iv. Supporting Explanation

Two schools are located within 505 feet of the project site, Pasadena City College and St. Philip the Apostle School. Construction of the proposed project would include removal of clarifiers, hydraulic lifts, and potentially removal of asbestos containing materials, lead-based paints, and polychlorinated biphenyls and contaminated soils. Removal of soils and demolition debris would be confined to the project site and would comply with the City's project specifications and applicable federal, state, and local regulations. Any storage, handling, and disposal of these materials would also occur in compliance with the appropriate regulations, which would minimize the potential for hazardous materials impacts and ensure that the impact from hazardous emissions to nearby schools is less than significant. (Draft EIR, p. 3.5-12)

Some limited transport, storage, use, or disposal of hazardous materials used in construction activities (e.g., fuels, lubricating fluids, and solvents) would occur. These types of materials are not acutely hazardous. Further, all storage, handling, and disposal of these materials are regulated, and releases are not anticipated. Therefore, construction of the proposed project would not emit or handle hazardous or acutely hazardous materials, substances, or waste that could affect an existing or proposed school within one-quarter mile of the site. Construction of the proposed project would not release toxic emissions and the impact would be less than significant. (Draft EIR, p. 3.5-12)

The proposed hotel and commercial/retail uses would not require the routine transport, use, or disposal of large quantities of hazardous materials. Further, any materials that are used or stored on-site would be in compliance with applicable local, state, and federal requirements such as Los Angeles County Fire Department hazardous materials requirements. Therefore, operation of the proposed project would not emit or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and the impact would be less than significant. (Draft EIR, p. 3.5-12)

e. Hydrology and Water Quality

i. Impacts Evaluated

- HYDRO-1: Would the project violate any water quality standards or waste discharge requirements? (Draft EIR, pp. 3.6-7 and 3.6-8)

- HYDRO-2: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in a substantial erosion or siltation on- or off-site? (Draft EIR, pp. 3.6-8 and 3.6-9)

- HYDRO-3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? (Draft EIR, p. 3.6-10)

- HYDRO-4: Would the project create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff? (Draft EIR, pp. 3.6-10 and 3.6-11)

- HYDRO-5: Would the project otherwise substantially degrade water quality?) (Draft EIR, p. 3.6-11)

ii. Proposed Mitigation – None Required

iii. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the proposed project would not result in significant impacts related to hydrology and water quality. As such, findings pursuant to CEQA Guidelines Section 15091 are not warranted.

iv. Supporting Explanation

Compliance with federal, state and local requirements and implementation of required BMPs provides the basis for the construction and operation phases of the proposed project to meet all applicable water quality standards and waste discharge requirements; hence, the project's impact in that regard would be less than significant. (Draft EIR, p. 3.6-8)

Construction activities would include clearing, grading, and excavation which may result in temporarily exposed areas of loose soil and sediment stockpiles, which are susceptible to sheet erosion; however, implementation of construction BMPs would

decrease erosion and sediment load into receiving waters and result in a less than significant impact for construction activities. Once in operation, the proposed project would occur on a similar amount of impervious surface area compared to existing conditions. The proposed project would not change the receiving water bodies nor require improvements to the tributary drainage area because the impermeable area of the site would not substantially change. In fact, with the capture and treatment of the first 0.75 inch of rain on the project site that may include infiltration pursuant to LID requirements, implementation of the proposed project could reduce the amount of stormwater flow from the site, thereby improving water quality in the immediate area of the site. In addition, the hotel uses associated with the operational activities of the proposed project would not generate any sediment. Therefore, the construction and operation of the proposed project would not result in erosion or siltation on- or off-site and impacts would be less than significant. (Draft EIR, p. 3.6-9)

As noted above, the construction activities (i.e., grading and excavation) associated with the proposed project may temporarily alter the direction of stormwater runoff from the project site. However, with the implementation of BMPs as required by the NPDES Construction General Permit, stormwater runoff would be properly managed onsite. Construction BMPs would help to control surface water flows into drainage systems such that nuisance-flooding does not occur on- or off-site. As required by the Construction General Permit, no BMPs would be allowed that would cause flooding at or around the project site. Once in operation, the drainage facilities included as part of the design of the proposed project would accommodate the amount and velocity of stormwater runoff. These drainage facilities would be designed in accordance with the standards under the County of Los Angeles Department of Public Works Hydrology Manual and would be subject to review and approval by the City's Department of Public Works. Stormwater flow from the proposed project would be comparable to, if not less than, existing conditions and is not expected to exceed the capacity of the stormwater drainage system. As is the case currently, stormwater generated onsite would be discharged into storm drains in the immediate vicinity of the project site which is subsequently discharged into Eaton Wash and ultimately into the Pacific Ocean. In addition, the proposed project would be subject to the City's impact fees (Municipal Code Section 4.19.060), which would be utilized to improve the City's storm drain system. The City would continue to maintain the culverts and storm drain system to prevent the accumulation of debris or other obstructions that could hamper the effectiveness of the system during wet weather. Therefore, compliance with existing standards and review processes would ensure a less than significant impact related to flooding during the construction and operation of the proposed project. (Draft EIR, p. 3.6-10)

As noted above, the amount of stormwater runoff generated at the project site and discharged into the local stormwater drainage system would be similar to, if not less than, that of existing conditions. As described in Section 3.5, Hazards and Hazardous Materials, of the Draft EIR (Draft EIR, pp. 3.5-1 through 3.5-14), past uses at the project site has resulted in potential onsite soil contamination. Should contamination be encountered and identified, it would be handled in compliance with applicable federal, state, and local regulations, as required by mitigation measure MM-HAZ-1. Thus, sources of polluted runoff from previous uses of the project site would be minimized. In addition, although construction activities associated with the proposed project could generate hazardous waste products (e.g., paints, solvents, adhesives, and other petroleum/gasoline products) that have the potential to create sources of polluted runoff, compliance with the requirements of the Construction General Permit, as described above, would ensure impacts are less than significant. During the operation phase, compliance with existing regulations (i.e., the City's adopted SUSMP, which is part of the NPDES MS4 permit for Los Angeles County) would ensure that the proposed project would not result in water quality exceedances nor would pollutants in project runoff compromise the Eaton Wash channel or ultimately the Pacific Ocean. Based on the above, the construction and operation of the proposed project would not provide substantial additional sources of stormwater or polluted runoff and a less than significant impact would occur. (Draft EIR, p. 3.6-11)

As noted above, compliance with federal and state requirements (i.e., Construction General Permit, NPDES MS4 permit, and SUSMP, as well as compliance with regulatory requirements if contaminated soils are encountered during construction as required under mitigation measure MM-HAZ-1 in Section 3.5, Hazards and Hazardous Materials) would address the potential for the project to degrade water quality from construction and operation of the project; the proposed project is not expected to violate any water quality standards or waste discharge requirements during construction or operation. In addition, the incorporation of water quality BMPs would control spillage, dumping or disposal of materials into the municipal stormwater system and reduce pollutants in stormwater and urban runoff to the maximum extent practicable. Therefore, the project would not substantially degrade water quality and the impacts would be less than significant. (Draft EIR, p. 3.6-11)

Cumulative Impacts

The majority of the area surrounding the proposed project site is developed with predominantly impervious or paved surfaces. While historically the majority of the City has been developed with impervious surfaces, the majority of new development, replaces existing structures and existing impervious surfaces. Each of these cumulative projects listed in Section 3.1, Environmental Impacts Analysis Introduction, Table 3.1-1,

Cumulative Projects in the City of Pasadena, on pages 3.1-5 and 3.1-6 of the Draft EIR is subject to the SUSMP Manual issued by the Los Angeles County Department of Public Works (LACDPW) and requirements under City's Stormwater Management and Discharge Control Ordinance for compliance with the MS4 Permit. The SUSMP and the Stormwater Management and Discharge Control Ordinance each contain requirements for limiting post-project runoff rates to no more than pre-project rates. In addition, past, present and reasonably foreseeable future projects would be required to implement BMPs pursuant to the General Construction Permit relative to the generation of pollutants that could enter stormwater and/or groundwater, and would be subject to federal, state, and local regulations relative to the handling of contaminated soils if encountered during construction, which, relative to the proposed project is required under mitigation measure MM-HAZ-1 (i.e., potentially significant impact related to contaminated soil, which in turn could result in surface water contamination, would be mitigated to less than significant with mitigation and; therefore, would not result in a cumulatively considerable contribution to a significant cumulative water quality impact). Thus, the proposed project would not contribute to a cumulatively significant impact when considered in combination with city-wide past, present or reasonably foreseeable future projects for water quality or surface waters and drainage.

f. LAND USE AND PLANNING

i. Impacts Evaluated

- LAND-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? (Draft EIR, p. 3.7-22)

ii. Proposed Mitigation – None Required

iii. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the proposed project would not result in significant impacts related to land use and planning. As such, findings pursuant to CEQA Guidelines Section 15091 are not warranted.

iv. Supporting Explanation

The project as proposed would be consistent with the overall intent of the land use plans that govern development in the project area. The proposed project would be consistent with the overall goals of the General Plan's Guiding Principles in the Land Use Element and would not preclude the attainment of the primary intent of the General Plan. Similarly, the project would be consistent with the ultimate vision of the East Colorado Specific Plan to "improve the appearance, function and urban ambiance of East Colorado Boulevard" and "to increase density and redevelop underutilized and dilapidated properties." The proposed project includes a change in zoning designation for both the North Parcel and the South Parcel from ECSP-CG-2 to PD and, for the northwest portion of the North Parcel, change in zoning designation from RM-48 PK to PD. The proposed change in zoning designation for both parcels to PD, along with the new language in the Pasadena Municipal Code identifying a purpose and development standards for the new PD zoning designation and the associated revision of the Zoning Map to show the new PD zoning designation for the entire project site provides for consistency with the City's Zoning Ordinance. Impacts related to consistency with applicable land use plans would be less than significant. (Draft EIR, p. 3.7-27)

Cumulative Impacts

The commercial/hotel buildings proposed on the project site may be constructed at the same time as planned and pending projects, listed in Table 3-1, Cumulative Projects in the City of Pasadena, on pages 3.1-5 and 3.1-6 of the Draft EIR. From a land use and planning perspective, the redevelopment of underutilized property and increase in density resulting from the proposed project in combination with the cumulative land use development of related projects is a desired and intended implement the City's General Plan and East Colorado Specific Plan. The goals and objectives identified in those documents advocate for mixed-used, multi-modal development at key locations, including the intersection of Hill Avenue and Colorado Boulevard. Of the related projects identified in Table 3.1-1, only two are located within the East Colorado Specific Plan area and none of the related projects are located within the College District sub-area. Of the two projects located within the East Colorado Specific Plan area, only one of them, a proposed 80-room hotel, would be located along Colorado Boulevard (related project No. 8 located at 1201 E. Colorado Boulevard, a proposed 80-room hotel that would replace a Michael's crafts store). In general, it would seem unlikely that the subject related project would result in a significant conflict with the East Colorado Specific Plan, let alone a significant cumulative impact when combined with the currently proposed project. If, however, there were to be a significant cumulative land use and planning impact, the currently proposed project's impacts would be less than significant and, therefore, would not have a cumulatively

considerable contribution to that impact would be less than significant. (Draft EIR, p. 3.7-28)

g. Noise

i. Impacts Evaluated

- NOISE-1: Would the project cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? (Draft EIR, p. 3.8-19)

ii. Proposed Mitigation – None Required

iii. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the proposed project would not result in significant impacts related to this aspect of noise. As such, findings pursuant to CEQA Guidelines Section 15091 are not warranted.

iv. Supporting Explanation

The project would cause a temporary increase in noise levels during construction. The primary noise sources during typical construction activities are diesel engines of construction equipment and activities such as pile driving, blasting, and jackhammering. No pile driving or blasting would occur during construction of the proposed project; however, nearby receptors would be exposed to occasional high noise levels associated with the operation of heavy equipment during construction, including air compressors, cement and mortar mixers, cranes, forklifts, generator sets, graders, pavers, paving equipment, rollers, rough terrain forklifts, rubber tired dozers, skid steer loaders, tractors/loaders/backhoes, and welders. Construction activities would be limited to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday and 8:00 a.m. to 5:00 p.m. Saturday, as required by the Pasadena Municipal Code (Noise Ordinance). Construction equipment that produces noise that exceeds 85 dBA Lmax at a distance of 100 feet would result in a significant impact. As presented in Table 3.8-5, Typical Maximum Noise Levels and Duty Cycles for Construction Equipment, on page 3.8-15 of the Draft EIR, noise generated from each piece of construction equipment assumed to be used during project construction would not exceed 85 dBA at 100 feet. Therefore, noise impacts during construction would be less than significant. (Draft EIR, p. 3.8-20)

Although the City's construction Noise Ordinance threshold pertains to the noise levels generated by each piece of construction equipment, the average noise levels at a

distance of 100 feet were also estimated for construction activities by phase, as shown in Table 3.8-9, Construction Noise Levels by Phase, on pages 3.8-20 through 3.8-22 of the Draft EIR. The noisiest phases of the project would be demolition of the existing buildings and parking lots, and, excavation for the subterranean levels of the proposed buildings. Some of the construction phases for the North and South Parcels of the proposed project would occur simultaneously. Table 3.8-10, Construction Noise Levels With Potential Overlap in Construction Phases, on page 3.8-22 of the Draft EIR shows the combined construction noise levels at a distance of 100 feet for the construction phases that would occur simultaneously for the North and South Parcels would not exceed the City's Noise Ordinance limit of 85 dBA at 100 feet, although noise levels at closer distances would higher (i.e., Noise levels at 50 feet from equipment would be approximately 6 dB higher than the noise levels at 100 feet). Based on the above, average construction noise levels during each phase of construction, both individually and as they may overlap, would not exceed 85 dBA at 100 feet; hence, the noise impacts would be less than significant. (Draft EIR, p. 3.8-22)

In addition to on-site activities, construction activities could include the import or export of excavated soils and other materials using large diesel trucks. As indicated in Table 3.8-5, a dump truck would generate a noise level of 78 dBA at a distance of 100 feet, which is below the City's construction noise limit of 85 dBA at 100 feet, but would be greater at locations in closer proximity to the noise source (i.e., 78 dBA at 100 feet would be 84 dBA at 50 feet). Impacts associated with construction-related trucks would be less than significant (i.e., less than 85 dBA at 100 feet). (Draft EIR, p. 3.8-22)

h. PUBLIC SERVICES (FIRE PROTECTION)

v. Impacts Evaluated

- FIRE-1: Would the project result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection? (Draft EIR, p. 3.9-5)

vi. Proposed Mitigation – None Required

vii. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the proposed project would not result in significant impacts related to

public services (fire protection). As such, findings pursuant to CEQA Guidelines Section 15091 are not warranted.

viii. Supporting Explanation

Demolition of existing structures on the project site and construction of the proposed project would be conducted in compliance with Chapter 14 of the California Fire Code, as adopted by the Pasadena Fire Prevention Code, which prescribes minimum safeguards for construction, alteration and demolition operations to provide reasonable safety to life and property from fire during such operations. Compliance with these safeguards would reduce the fire risk during construction. With implementation of these safeguards, construction of the proposed project would not impact existing fire protection services, including acceptable service ratios or response times, such that new or physically altered facilities would be required, the construction of which could cause significant environmental impacts (i.e., impact of project would be less than significant). (Draft EIR, p. 3.9-5)

Operation of the proposed project would be required to comply with all applicable city, state, and federal codes and ordinances. Existing structures would be replaced and/or retrofitted to meet modern fire code requirements and the following fire safety devices would be installed in all new buildings in accordance with Chapter 9 of the California Fire code: fire sprinkler systems, fire detection and early warning systems, modern fire resistant materials, and smoke evacuation systems. The proposed project would also be required to comply with all regulations of the Pasadena Fire Prevention Code (Pasadena Municipal Code, Chapter 14.28), which establishes provisions and requirements for the safe construction and maintenance of property, facilities, conditions, materials, equipment, fire prevention and alarm systems and architectural plans would be reviewed and approved by the Pasadena Fire Department (PFD) prior to project implementation. The proposed project would be served by Fire Station 34, located at 1360 E. Del Mar Boulevard, which had an average response time of 6 minutes 46 seconds during the 2012/2013 fiscal year. The PFD has stated that this is an acceptable response time and that Fire Station 34 currently has the capabilities to handle the emergency response needs for the proposed project without an increase in response time or the need for more personnel or equipment. Therefore, construction of new or expansion of the existing fire facilities would not be required as a result of the proposed project, and impacts would be less than significant. (Draft EIR, p. 3.9-6)

Cumulative Impacts

The PFD provides fire protection services throughout the City of Pasadena. Therefore, the geographic scope for this cumulative analysis is the city limits, i.e., the

PFD service area. Current fire protection response times within the City of Pasadena are considered acceptable (the average response time for fire stations within the City of Pasadena is approximately four to five minutes), and the PFD has the capabilities of handling the increased demand associated with implementation of the proposed project and other foreseeable developments within the city without increasing its average response time. Like the proposed project, other development projects within the city would be required to comply with all regulations of the Pasadena Fire Prevention Code (Pasadena Municipal Code, Chapter 14.28) and all other applicable city, state, and federal codes and ordinances. In addition, architectural plans would be reviewed and approved by the PFD. Given the above, cumulative development would not result in the need for a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain adequate service levels. Therefore, cumulative impacts related to fire protection services would be less than significant. (Draft EIR, p. 3.9-6)

i. TRANSPORTATION AND TRAFFIC

ix. Impacts Evaluated

- TRAFFIC-2: Would the project conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? (Draft EIR, p. 3.10-27)

- TRAFFIC-3: Would the project increase hazards due to a design feature (e.g., sharp curves or dangerous intersection) or incompatible uses (e.g., farm equipment)? (Draft EIR, p. 3.10-30)

x. Proposed Mitigation – None Required

xi. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the proposed project would not result in significant impacts related to these aspects of transportation and traffic. As such, findings pursuant to CEQA Guidelines Section 15091 are not warranted.

xii. Supporting Explanation

Based on the incremental project trip generation estimates and trip distribution percentages to and from the project, as presented in Table 3.10-5, Estimated Project Trip Generation, on page 3.10-28 of the Draft EIR and Table 3.10-6, Project-Related Trip Distribution, on page 3.10-29 of the Draft EIR, respectively, the proposed project is not expected to add 50 or more new trips per hour to the intersections of Arroyo Parkway/California Boulevard and Rosemead Boulevard/Foothill Boulevard. Therefore, no further analysis of these CMP monitoring intersections is required. Impacts to this CMP intersection would be less than significant with implementation of the proposed project. (Draft EIR, p. 3.10-29)

The nearest CMP mainline freeway monitoring locations adjacent 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 and trip distribution percentages to and from the project, the proposed 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. Impacts on the nearest CMP mainline freeway monitoring locations would be less than significant with implementation of the proposed project. (Draft EIR, p. 3.10-29)

Based on the analysis presented on p. 3.10-30 of the Draft EIR, and review by the City's Department of Transportation, implementation of the project would not present or increase traffic hazards. The project includes standard access and circulation improvements and no hazardous design features are proposed.

j. UTILITIES AND SERVICE SYSTEMS

xiii. Impacts Evaluated

- UTILITIES-1: Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (Draft EIR, p. 3.11-12)

- UTILITIES-2: Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (Draft EIR, p. 3.11-16)

- UTILITIES-3: Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? (Draft EIR, p. 3.11-17)

- UTILITIES-4: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Draft EIR, p. 3.11-17)

- UTILITIES-5: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? (Draft EIR, p. 3.11-18)

xiv. Proposed Mitigation – None Required

xv. Findings Pursuant to CEQA Guidelines Section 15091

As noted above and explained below, the EIR analysis determined that implementation of the proposed project would not result in significant impacts related to utilities and service systems. As such, findings pursuant to CEQA Guidelines Section 15091 are not warranted.

xvi. Supporting Explanation

Based on the Water Supply Assessment (WSA) completed for the proposed project (Draft EIR, Appendix H) in accordance with the requirements of California Water Code Section 10910 *et seq*, the City of Pasadena Water and Power (PWP) water supplies and long-term storage balances would be adequate to meet the future water demand from the proposed project. Additional discussion of the PWP and Metropolitan Water District's water supply sources and reliability is provided in the WSA. Buildout of the proposed project would increase demands on the existing water conveyance infrastructure. However, according to the City's East Colorado Boulevard Specific Plan (page VII 2), the water demand generated by future residential and commercial development (e.g., the proposed project) within the plan area is not expected to create significant additional demand on the water conveyance systems. Therefore, no additional water structures or changes to the water conveyance would be incorporated into the project design elements. The conveyance size and capacity of the two existing water mains running along Colorado Boulevard would adequately serve the needs of

the proposed project. Based on the above, the proposed project would result in a less than significant impact relative to operations-related water supply and conveyance systems. (Draft EIR, p. 3.11-15) In addition to operations-related water demands, the construction phase of the proposed project would create a temporary, intermittent demand for water for such activities as soil watering for site preparation, fugitive dust control, concrete preparation, painting, cleanup, and other short-term activities. However, construction-related water volumes would be temporary and minimal and would not require new or expanded water service entitlements and impacts would be less than significant. (Draft EIR, p.3.11-17)

None of the wastewater reclamation plants that may serve the proposed project are presently deficient and all would have sufficient wastewater treatment capacity to accommodate the additional need generated by the project. The City of Pasadena Master Sewer Plan includes an evaluation of wastewater conveyance lines throughout the City for existing conditions and anticipated growth. For the East Colorado Specific Plan area, the Master Sewer Plan anticipates the 650,000 square feet of new development, and indicates no existing or future conveyance pipeline deficiencies in the vicinity of the project site for peak dry weather or peak wet weather conditions. Based on the above, the proposed project would result in a less than significant impact relative to wastewater treatment and conveyance facilities. (Draft EIR, pp. 3.11-16 and 3.11-18)

Stormwater generated from the project site would be discharged into storm drains in the immediate vicinity of the project site, which discharge into the Eaton Wash and ultimately into the Pacific Ocean. The capacity of the adjacent channels or stormwater drainage system is not expected to be exceeded and would not increase above baseline conditions. In addition, stormwater runoff as a result of proposed project would be subject to the City's impact fees (PMC 4.19.060), which would be utilized to improve storm drains in the vicinity of the project site. Therefore, impacts related to stormwater conveyance would be less than significant. (Draft EIR, p. 3.11-17)

The operation of the proposed project would generate approximately 323.6 tons of solid waste per year (Draft EIR, Table 3.11-7, Estimated Solid Waste Generated by Proposed Project, on page 3.11-19). The landfills used by the City would have sufficient remaining capacity to accommodate this annual increase (Draft EIR, Table 3.11-2, Landfills Service the City of Pasadena, on page 3.11-5). In addition, the applicant of the proposed project would submit a recycling program, as required by the Solid Waste Collection Franchise System Ordinance (PMC 8.61). With compliance with the City's solid waste diversion regulations and recycling requirements, the proposed project would result in a less than significant impact relative to the existing and projected landfill capacities. (Draft EIR, p. 3.11-19)

Cumulative Impacts

Cumulative development would not require or result in the construction of new water or wastewater treatment facilities, or expansion of existing facilities. As indicated in General Plan Update Draft EIR, no new major sewer upgrades are anticipated to be necessary. All new development in the City will be subject to sewer capacity considerations as part of the City approval process. Improvements and upgrades to sewer lines are prioritized based on need. Development fees are collected from each project and used to fund the highest priority improvements. In the event expansion of existing sewer facilities are needed, impacts related to construction activities would be addressed and mitigated in the manner generally described in Section 3 of the Draft EIR and Section 5 of the General Plan Update EIR. Similarly, no major upgrades to the City's water delivery system are expected to be necessary to serve future development, given the existing urbanized nature of the City, and site/project-specific improvements to nearby water delivery infrastructure would be addressed and mitigated on an individual basis. With regard to water supplies, the water supply assessment completed for the General Plan Update EIR found that existing and planned/committed water supplies are sufficient to serve the existing and future water demands of the City including with the proposed General Plan update. Additionally, PWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands. Based on the above, cumulative impacts from upgrades or improvements to existing water or sewer infrastructure, and relative to water supply, would be less than significant. (Draft EIR, pp 3.11-20 and 3.11-21)

Cumulative development would not result in construction of new stormwater drainage facilities or expansion of existing facilities. Future development of the project site along with other development within the city, as contemplated in the General Plan update would not result in a significant increase in impervious surfaces, because such areas are already built out. Additionally, project applicants for new development or significant redevelopment are required to implement site design measures, including LID and SUSMP BMPs, which in most cases would increase surface water infiltration and reduce runoff. No significant cumulative impacts related to construction of new stormwater drainage facilities or expansion of existing facilities would occur (i.e., impacts would be less than significant). (Draft EIR, p 3.11-20)

Relative to whether there is sufficient permitted capacity to accommodate solid waste from cumulative development, the General Plan Update Draft EIR indicates that implementation of the update would result in a net increase of about 57.26 tons per day (tpd) of solid waste, and the solid waste facilities accepting the vast majority of solid waste from Pasadena have a combined remaining capacity of about 158.3 million tons

and closure dates as late as 2045. As such, there is sufficient landfill capacity in the region for solid waste that would be generated by buildout in accordance with the proposed General Plan Update. While mixed-use development at the project site is identified in the land use plan for the General Plan Update, even a conservative assumption that the 0.892 tpd of solid waste generation associated with the project is added to the 57.26 tpd estimate for the General Plan Update, it would still be well within the existing available capacity. As such, cumulative impacts related to landfill capacity would be less than significant. (Draft EIR, p 3.11-21)

IV. CEQA FINDINGS ON ENVIRONMENTAL IMPACTS MITIGATED TO BELOW A LEVEL OF SIGNIFICANCE

The City Council finds that mitigation measures have been identified in the Final EIR that will reduce the following significant environmental impacts to below a level of significance. For each environmental topic within this category, the discussion below begins with a delineation of the impacts evaluated in the EIR, as specifically related to that topic, along with page citations as to where in the EIR the relevant discussion is found, and is followed by a presentation of the mitigation measure(s) identified in the EIR for that topic, and then provides an explanation of the substantial evidence in support of the EIR conclusion that the impact would be reduced to a level less than significant within implementation of the mitigation measure(s).

k. AIR QUALITY

i. Significant Impacts Evaluated

- AIR-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation? (Draft EIR, p. 3.2-15)
- AIR-3: Would the project expose sensitive receptors to substantial pollutant concentrations? (Draft EIR, p. 3.2-17)

ii. Proposed Mitigation

MM-AQ-1: Tier 3 Emission Standards

All off-road engines during construction shall meet the Tier 3 emission standards during the building construction phase for both the North and South Parcels. (Draft EIR, P. 3.2-17)

MM-AQ-2: Diesel Particulate Filters

All off-road diesel engines during construction must be equipped with diesel particulate filters capable of reducing PM10 and PM2.5 emissions by at least 50 percent the uncontrolled emission rate of the construction equipment. (Draft EIR, P. 3.2-22)

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.

iv. Supporting Explanation

Construction emissions are expected to occur from engine exhaust from the off-road construction equipment and vehicle trips made by construction workers, vendors, and haul trucks. These emissions would primarily consist of carbon monoxide (CO), nitrogen oxides (NOx), particulate matter that measures 10 microns or less (PM10), particulate matter that measures 2.5 microns or less (PM2.5), sulfur dioxide (SO2), and reactive organic gases (ROG). In addition, earth disturbance activities from grading and paved road dust would result in fugitive dust emissions; architectural coating and paving activities would result in ROG emissions. Based on the construction- and operational-related air pollutant emissions estimated for the proposed project, as shown in Table 3.2-8, Construction Emissions Summary for Maximum Daily Emissions, on page 3.2-16 of the Draft EIR and Table 3.2-9, Operational Emissions Summary on page 3.2-17 of the Draft EIR, all estimated emissions would be below the thresholds of significance except for total unmitigated construction emissions of NOx, which would be 132 pounds per day (lbs/day), exceeding the 100 lbs/day threshold of significance. Implementation of mitigation measure MM-AIR-1, which calls for off-road engines used during construction to meet USEPA Tier 3 emission standards, would reduce total NOx emissions to 88 lbs/day. As such, the subject impact would be reduced to a less than significant level. (Draft EIR, p. 3.2-16)

To assess whether a proposed project would expose sensitive receptors to substantial pollutant concentrations, the SCAQMD developed localized significance thresholds (LSTs) for local air quality impacts from construction and operational activities. The LSTs represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable ambient air quality standards. These thresholds address project level and cumulative impacts. As shown in Table 3.2-10, LST Analysis for On-Site Construction Emissions, on page 3.2-

18 of the Draft EIR, on-site construction emissions would exceed the LST for NOx (117 lbs/day compared to threshold of 98 lbs/day), PM10 (7 lbs/day compared to threshold of 6 lbs/day), and PM2.5 (7 lbs/day compared to threshold of 4 lbs/day) and would therefore be significant without mitigation. As also shown in Table 3.2-10 of the Draft EIR, implementation of Mitigation Measures MM-AQ-1, described above, and MM-AQ-2, which requires off-road construction equipment to be equipped with diesel particulate filters, would reduce construction emissions to less than significant levels; specifically, NOx, PM10, and PM2.5 emissions would be reduced to 73 lbs/day, 3 lbs/day, and 3 lbs/day, respectively. As shown in Table 3.2-11, LST Analysis for On-Site Operational Emissions, on page 3.2-19 of the Draft EIR, on-site operational emissions would not exceed LST standards. (Draft EIR, pp. 3.2-18 and 3.2-19)

Cumulative Impacts

According to the SCAQMD white paper *Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D Cumulative Impact Analysis Requirements Pursuant to CEQA* (SCAQMD 2003), projects that do not exceed the significance thresholds are generally not considered to be cumulatively significant. As discussed above, regional construction emissions were determined to be cumulatively considerable (significant), without mitigation. With implementation of mitigation measure (MM) AQ-1, impacts would be reduced to less than significant (not cumulatively considerable). Additionally, localized impacts would be cumulatively considerable (significant) without mitigation, as shown above. With implementation of mitigation measures MM AQ-1 and MM AQ-2, impacts would be reduced to less than significant (not cumulatively considerable). Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the cumulatively considerable effects identified in the Final EIR. (Draft EIR, pp. 3.2-21 and 3.2-22)

I. CULTURAL RESOURCES

i. Significant Impacts Evaluated

- CR-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5? (Draft EIR, p. 3.3-25)
- CR-3:Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Draft EIR, p. 3.3-35)

ii. Proposed Mitigation

MM-CR-1: Historic American Building Survey Documentation

The applicant shall be responsible for preparing documentation of the H.G. Loud Autos site (North Parcel) using the Historic American Building Survey (HABS) Level III standards as the guideline for recording the building through photographs, drawings and a written description. The HABS documentation shall be reviewed and approved by the City of Pasadena Department of Planning and Community Development: Design and Historic Preservation Section staff as a condition of approval of the project and prior to issuance of a demolition permit. The following documentation shall be prepared to document and record the historic resource:

a. Written Data: Additional research shall be performed to document the history of the site and the auto-related businesses located therein dating from the early twentieth-century. The additional research shall be used to gain a more complete understanding of the history of the auto industry in Pasadena, and the use of the International Style architecture for the various brands of automobiles and their dealerships in Pasadena and Los Angeles County.

b. Drawings: Under HABS Level III, if the original drawings of the H. G. Loud Autos complex prepared by Sylvanus Marston are available, they shall be reproduced in ink on Mylar. If the original drawings/plans for the H. G. Loud Autos complex cannot be located, then sketch plans depicting the floorplans of the current conditions of the buildings and structures shall be prepared by a licensed architect. A copy of the current site plan shall be included with the sketch drawings of the floorplans. The current condition drawings shall be reproduced on Mylar, and in digital format.

c. Photographs: Under HABS Level III, a representative number of large-format photographs and negatives shall be produced to capture interior and exterior views of each building and structure of the H. G. Loud Autos complex on the North Parcel. The large format photos shall be supplemented with color digital photographs to fully document the property. At least four large format photographs shall be taken to show the property's setting in context, and in relationship to, its location on East Colorado Boulevard.

d. Document: The HABS Level III document shall be produced on archival-quality paper, and all large format photographs and negatives labeled to HABS standards. The HABS document shall be donated to the archives of the Pasadena Museum of History. (Draft EIR, pp. 3.3-31 and 3.3-32, as modified in the Final EIR, p. 2-2)

MM-CR -2: Interpretive Display Presenting Site History

The applicant will be responsible for a "history of the automobile in Pasadena" interpretive display that shall be available for public viewing in one of the remaining showroom sections of the H. G. Loud Autos complex. The interpretive display shall present a history of the site and the significance of the International Style of architecture to the automobile-related industry of Pasadena. The interpretive display shall be prepared by a qualified Historian, Architectural Historian, or organization (such as the Peterson Automotive Museum or California Route 66 Museum) with experience in creating such materials for educational purposes. The design and content of the interpretive display shall be approved by the City of Pasadena Department of Planning and Community Development: Design and Historic Preservation Section staff prior to demolition activities on the project site. (Draft EIR, p. 3.3-32, as modified in the Final EIR, p. 2-3)

MM-CR -3: Preservation, Restoration, Adaptive Use Plan

The applicant shall be responsible for developing a Preservation, Restoration, Adaptive Reuse plan for the rehabilitated showroom portions of the showroom-administration-repair buildings and for the relocation/restoration of the "Welcome" sign. The showrooms shall be rehabilitated to serve alternative use/s for the proposed Project, and the "Welcome" sign shall be installed within one of the showroom spaces or in another place visible from Colorado Boulevard. Suggested reuses of the showrooms, such as to include an interpretive display, are discussed in MM-CR-2. The rehabilitation shall follow the Secretary of the Interior's Guidelines for the Treatment of Historic Properties, and the services of a Historic Architect or Architectural Historian who meets the Secretary of the Interior's Standards for Professionals and who has sufficient experience with using the Guidelines shall be retained to assist the project team to develop a Preservation, Restoration, Adaptive Use Plan. As part of the rehabilitation program, a Historic Structures Report (HSR) shall be prepared to document current conditions and present proposed alterations to the building per the Guidelines. (Draft EIR, p. 3.3-33)

MM-CR-4: Photodocumentation

Prior to any construction activities, the applicant will be responsible to have a qualified Architectural Historian or Historic Architect prepare a photodocumentation of the exterior of the F. Suie One Antiques Store building. A set of detailed photographs of exterior facades will be used to assist in the repair

of any unanticipated vibration-caused or other construction-related damage (see also MM-NOISE-6, MM-NOISE-7, and MM-NOISE-9 regarding mitigation of construction-related vibration damage to historic structures). (Draft EIR, p. 3.3-33, as modified in the Final EIR, p. 2-3)

MM-CR-5: Repair of Construction-Related Damage to Showroom

In the event of unanticipated construction-related damage to the historic showroom sections of the project, the applicant shall be responsible for restoring the buildings to their historic appearance by application of the Secretary of the Interior's Guidelines for the Treatment of Historic Properties. Project management shall retain the services of a historic architect or architectural historian who meets the Secretary of the Interior's Standards for Professionals, and has at least 10 years of experience with using the Guidelines, to assist the project team to develop a restoration plan of the showrooms. (Draft EIR, p. 3.3-33)

MM-CR–6: Paleontologist Retained during Construction

A qualified Paleontologist shall be notified and retained when earth-moving activities are anticipated to impact undisturbed deposits in the Older Quaternary Alluvium on the project site. The Paleontologist shall be present during the pre-grade meeting to discuss paleontological sensitivity and to assess whether scientifically important fossils have the potential to be encountered. The schedule and extent of monitoring activities shall be determined at the meeting in consultation with the City of Pasadena. Although exact depths are not possible to determine at this time, Older Alluvium is typically present below five feet from current ground surface; therefore, monitoring will likely be needed where undisturbed Older Alluvium occurs below five feet. This will be more definitively assessed at the pre-grading meeting. If any scientifically important large fossil remains are uncovered during earth-moving activities, the Paleontologist shall divert heavy equipment away from the fossil site until s/he has had an opportunity to examine and remove the remains. Samples of Older Quaternary Alluvium shall be collected for processing and examination for very small vertebrate fossils.

All paleontological work to assess and/or recover a potential resource at the project site shall be conducted under the direction of the qualified Paleontologist. Any fossils recovered during Project site development, along with their contextual stratigraphic data, shall be donated to an appropriate institution with an educational and research interest in the materials. The Paleontologist shall

prepare a report of the results of any findings as part of a testing/mitigation plan following accepted professional practice. (Draft EIR, p. 3.3-35)

MM--NOISE-5: Interior Noise Level

Interior Noise Level Prior to the issuance of each building permit, the Applicant shall present data to the Director of Planning and Community Development demonstrating that the interior noise level of hotel rooms facing Colorado Boulevard or Hill Avenue shall not exceed 45 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL).

MM- NOISE-6: Vibration Monitoring of Historic Buildings

Prior to approval of grading plans and/or prior to issuance of demolition, grading and building permits, the project proponent shall retain a Professional Structural Engineer with experience in structural vibration analysis and monitoring for historic buildings and a Project Historical Architect (PHA) as a team to perform the following tasks:

- Review the project plans for demolition and construction.
- Survey the project site and the historic buildings occupied by the F. Suie One Antiques Store and the new car showroom, including geological testing, if required.
- Prepare and submit a report to the Director of Planning and Community Development that includes but is not limited to the following:
  - Any description/survey information obtained under the second bullet point.
  - Any modifications to the vibration level limits based on building conditions, soil conditions, and planned demolition and construction methods to ensure that vibration levels would remain below the potential for damage to the existing F. Suie One Antiques Store and the new car showroom.
  - Specific measures to be taken during construction to ensure the specified vibration level limits are not exceeded.
  - A monitoring plan to be implemented during demolition and construction that includes post-construction and post-demolition surveys of the existing F. Suie One Antiques Store and the new car showroom.

Examples of measures that may be specified for implementation during demolition or construction include, but are not limited to the following:

- Prohibition of certain types of construction equipment.

- The requirement for lighter-tracked or wheeled equipment.
- Specifying demolition by non-impact methods, such as sawing concrete.
- Organization of phasing so as to avoid simultaneous vibration sources.
- Installation of vibration-measuring devices to guide decision making for subsequent activities. (Draft EIR, pp. 3.8-37 and 3.8-38)

MM- NOISE-7: Secretary of the Interior's Standards

At the conclusion of vibration-causing activities, in the unanticipated event of discovery of vibration-caused damage, the Structural Engineer and the Project Historical Architect shall document any damage to the F. Suie One Antiques Store and the new car showroom and shall recommend necessary repairs. The Applicant shall be responsible for any repairs associated with vibration caused damage. Repairs shall be undertaken and completed, as required, to conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties (Code of Federal Regulations, Title 36, Section 68) and any other codes if applicable such as the California Historical Building Code (California Code of Regulations, Title 24, Part 8). (Draft EIR, p. 3.8-38)

MM- NOISE-8: Vibration Notification

At least 5 days prior to the start of construction, the project proponent shall notify property owners of occupied buildings located within 25 feet of the project site boundary that perceptible levels of construction-related vibration may be experienced periodically during the course of project construction. The notification shall include a brief description of the types of construction equipment and activities that may produce such vibration, the estimated duration of such activities including the anticipated start dates and end dates, and a contact name and phone number to contact with any questions. (Draft EIR, p. 3.8-39)

MM- NOISE-9: Vibration Mitigation Plan for Holliston Avenue Methodist Church.

Prior to approval of grading plans and/or prior to issuance of demolition, grading, and building permits for the North Parcel, the Project proponent shall provide a detailed vibration analysis prepared by a Professional Structural Engineer with experience in structural vibration analysis demonstrating that use of the vibratory compaction equipment at the Project boundary closest to the Holliston Avenue Methodist Church building would not result in damage to the structure or the

stained glass window units. To ensure constant monitoring of project activities causing vibration, it may be advantageous to install ground vibration monitoring equipment at the Church throughout the construction of the Project.

At the conclusion of vibration-causing activities, in the unanticipated event of discovery of vibration-caused damage, the Structural Engineer and the Project Historical Architect shall document any damage to the Holliston Avenue Methodist Church and shall recommend necessary repairs. The Applicant shall be responsible for any repairs associated with vibration caused damage. Repairs shall be undertaken and completed, as required, to conform to the Secretary of the Interior's Guidelines for the Treatment of Historic Properties (Code of Federal Regulations, Title 36, Section 68) and any other codes if applicable such as the California Historical Building Code (California Code of Regulations, Title 24, Part 8). (Draft EIR, p. 3.8-39, as modified in the Final EIR, pp. 2-3 and 2-4)

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.

iv. Supporting Explanation

The proposed Project calls for the demolition of all the buildings and structures on the North and South Parcels of the Project Site except for the showroom portions of the H. G. Loud Autos buildings in the North Parcel, and the removal and re-placement of the "Welcome" sign. The showroom of the H.G. Loud Autos site has been determined to be eligible for listing in the National Register and is, therefore, a historical resource pursuant to CEQA. To determine if the proposed project would significantly impact this historical resource, the analysis in the Draft EIR evaluated whether the proposed project would result in a substantial adverse change in the significance of an historical resource. Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired." There are two considerations in determining whether the proposed project would cause the H.G. Lo-ud Autos showroom to no longer convey its historical significance and therefore result in a significant impact on historic resources pursuant to CEQA: 1) whether the important architectural features of the historic resource are preserved; and 2) whether the integrity of the historical resource is maintained.

The project proposes to preserve the Loud Showroom in-place, including the character-defining architectural features, including the large display windows and pedestrian entryways. City procedures require design review and a finding that the project is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards). However, construction of the proposed project has the potential to inadvertently damage the showrooms. Implementation of MM-CR-5, which requires repair of any construction-related damage to the showroom in a manner consistent with Secretary of the Interior's Guidelines for the Treatment of Historic Properties, would address that impact. Regarding whether the integrity of the H.G. Loud Autos Showroom would be retained with implementation of the proposed project, the Draft EIR evaluated that impact in terms of the seven aspects or qualities in how the National Park Service evaluates properties for listing in the National Register of Historic Places: location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property will always possess several, and usually most, of the aspects. The Draft EIR analysis of those aspects/qualities, as presented on pages 3.3-27 through 3.3-30 of the Draft EIR, determined that, while the proposed project would maintain four of the seven aspects of the historic resource's integrity--location, design, materials, and workmanship--the project has the potential to affect the remaining three of the seven aspects of the historic resource's integrity: setting, feeling, and association. The potential for the project to degrade the integrity of the historic resource is a significant impact that warrants mitigation to ensure the historic sense of the particular period of time and use/industry associated with the H.G. Loud Autos Showroom is retained. That impact would be reduced to less than significant through implementation of: MM-CR-1, requiring the preparation of Historic American Building Survey (HABS) documentation; MM-CR-2, requiring the project applicant to be responsible for having a "history of the automobile in Pasadena" interpretive display available for public viewing in one of the remaining showroom sections; and, MM-CR-3, requiring the applicant to be responsible for developing a Preservation, Restoration, Adaptive Reuse Plan for the rehabilitated showroom portions of the showroom-administration-repair buildings and for the relocation/restoration of the "Welcome" sign. (Draft EIR, pp. 3.3-33 and 3.3-34).

In addition to on-site impacts, implementation of the proposed project could impact properties immediately adjacent to the project site; specifically, the F. Suie One Antiques Store, which was determined to be eligible for listing as a City of Pasadena Historic Landmark. (Draft EIR, p. 3.3-11) The proposed construction of a new building and associated underground parking on the North Parcel of the project site would require extensive excavation of the ground within the boundary of the North Parcel. As discussed in greater detail in Section 3.8, Noise and Vibration, of the Draft EIR (pages 3.8-1 through 3.8-30), vibration generated by construction activity has the potential to damage structures, which could include structural damage (i.e., cracking of floor slabs, foundations, columns, and beams) or cosmetic architectural damage (i.e., cracked

plaster, stucco, or tile). The preliminary vibration analysis completed for the Draft EIR determined that since the exact limits of equipment use, types of equipment to be used, and soil conditions are not known, the potential for vibration generated during construction to affect the F. Suie One Antiques Store and the H.G. Loud Autos Showroom is considered a significant impact without mitigation. However, with implementation of Mitigation Measure (MM) NOISE-6 and MM-NOISE-7, that require limiting of vibration levels to ensure that they would remain below the potential for building damage, and compliance with the Secretary's Standards for any related repairs, impacts associated with structural damage as a result of vibration would be reduced to a less than significant level. There is no evidence that there will be any other direct impacts associated with construction and construction-related activities of the proposed project, nor indirect impacts caused by the construction or operation of the proposed project, that would cause a substantial adverse change to the historic resource located immediately adjacent to the project site; hence, impacts would be less than significant. (Draft EIR, pp. 3.3-31 and 3.8-36)

Regarding other historic properties located in the general vicinity of the project site, there is no evidence that there will be any direct impacts associated with construction and construction-related activities of the proposed project, nor indirect impacts caused by the construction or operation of the proposed project, that would cause a substantial adverse change to any of the historic properties located within a one block radius of the project site, with one possible exception. The historic Holliston Avenue Methodist Church is located approximately 70 feet west of the project site and contains substantial amounts of stained glass windows along the facades that face the project site. Given the fragile nature of the stained glass windows, it is conservatively assumed that construction-related vibration could damage those windows, which would be a significant impact to an historic resource; however, implementation of MM-NOISE-9, which requires preparation of a vibration mitigation plan specific to that structure, would reduce the impact, if any, to a less than significant level. (Draft EIR, p. 3.8-37)

Regarding paleontological resources, there are no recorded fossil localities within the project site; however, the Natural History Museum of Los Angeles County (NHMLAC) has identified fossil localities from sedimentary units similar to those that occur on the project site. Although the project site is already developed and subsurface soils have been previously graded, consequently removing or disturbing any shallow paleontological resources, if any were present at the time, excavations associated with construction of the underground parking structures on both the North and South Parcels would extend into lower elevations and likely disturb native soils. Excavations in the older Quaternary Alluvium deposits exposed throughout the project site have the potential to encounter vertebrate fossils; therefore, the potential to encounter unknown paleontological resources constitutes a significant impact. Implementation of MM-CR–6,

requiring that a paleontologist be retained during construction, provides the necessary safeguard for addressing paleontological resources, if discovered during grading, thereby reducing the impact to less than significant. (Draft EIR, p. 3.3-36)

Cumulative Impacts

Implementation of the proposed project would occur in combination with past, present, and potential future cumulative development in the City of Pasadena, as reflected in the adopted growth plans for the area (i.e., SCAG 2012 RTP/SCS Plan), which may result in the demolition and alteration of existing historic structures and grading of undisturbed soils which may encounter archaeological or paleontological resources. As noted above, the proposed project would not result in a cumulatively considerable impact on archaeological resources. No archaeological resources are expected to found on the site, and should this occur, a recommended condition of approval would ensure that no significant impacts would occur. As discussed above, the proposed project has the potential to encounter unknown paleontological resources, therefore impacts are considered significant (cumulatively considerable). However, should unknown paleontological resources be uncovered on the site, implementation of mitigation measures MM-CR-6 would reduce paleontological impacts to less than significant levels (i.e. not cumulatively considerable).

The project would result in a significant impact (cumulatively considerable contribution) to historic resources; however, with implementation of mitigation, the proposed project's impacts would be reduced to a level that is less than significant (not cumulatively considerable). Implementation of the proposed project, in combination with past, present, and potential future cumulative development in the City of Pasadena, as reflected in the adopted growth plans for the area (i.e., SCAG 2012 RTP/SCS Plan), may significantly alter the historic character of Pasadena; however, with implementation of MM-CR-1 through MM-CR-5 to reduce project-specific impacts to a level that is less than significant along with the fact that, citywide, a historic resource impact analysis will be conducted for each project planned within, or in the immediate vicinity of an historic structure or district, and future projects will be required to comply with any mitigation measures identified to reduce the severity of impacts to historic and cultural resources, cumulative impacts to historic resources would be less than significant. (Draft EIR, p. 3.3-36)

m. HAZARDS AND HAZARDOUS MATERIALS

i. Significant Impacts Evaluated

- HAZ-1: Would the proposed 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?? (Draft EIR, p. 3.5-9)

ii. Proposed Mitigation

MM-HAZ-1: Encountering Contaminated Soil

If soil is encountered during project construction that is identified or suspected of being impacted by hazardous materials (on the basis of staining, chemical odors, or other evidence), work at the subject construction activity area will be halted and the suspect site conditions will be evaluated by a qualified environmental professional. The results of the evaluation will be submitted to the Pasadena Fire Department (PFD), the Department of Toxic Substances Control (DTSC), and/or the California Regional Water Quality Control Board (RWQCB), if/as appropriate, and the necessary response/remedial measures will be implemented, as directed by DTSC, RWQCB, LACoFD, PFD, or other applicable oversight agency, until all specified requirements of the oversight agencies are satisfied and a no-further action status determination is attained, if/as appropriate. (Draft EIR, p. 3.5-11)

MM-HAZ-2: Clarifier and UST Removal and Closure

Prior to the issuance of a grading permit, all subgrade clarifiers and underground storage tanks shall be removed and closed to current regulatory standards, in accordance with all Pasadena Fire Department (PFD) regulations, and shall also include compliance with SCAQMD Rule 1166 relative to monitoring for, and management of, soils contaminated by VOC's associated with such facilities. SCAQMD Rule 1166 requirements include, but are not limited to, monitoring for VOCs during excavation and grading activities and, if VOC-contaminated soil is detected (i.e., soils with VOC concentrations of 50 parts per million (ppm) or more as measured at a distance of three inches), such materials must be reported, segregated, treated and/or removed from the project site within 30 days. (Draft EIR, p. 3.5-11)

MM-HAZ-3: PCB, Asbestos, and Lead-Based Paint Surveys

Prior to demolition or renovation of any on-site structures, a survey shall be performed to identify any Polychlorinated Biphenyls (PCBs), asbestos containing materials (ACM) and lead-based paint (LBP) within existing structures following U.S. Environmental Agency Guidance for Controlling Asbestos-Containing Materials in Buildings (1985) survey guidelines. If PCBs, ACM, and/or LBP are found, the compounds shall be removed or otherwise abated prior to demolition or renovation. Removal and abatement activities shall comply with all applicable laws, regulations, and rules established by federal, state, and local standards, including, but not limited to, those set forth by CalOSHA regulations, and SCAQMD regulations for the excavation, removal, and proper disposal of ACMs and LBP. (Draft EIR, pp. 3.5-11 and 3.5-12)

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.

iv. Supporting Explanation

Construction activities include demolition of existing buildings and excavation and removal of underground USTs, clarifiers and hydraulic hoists with associated oil storage facilities and piping. While no notable contamination was found at these facilities during the site investigations summarized in Section 3.5.2 of the Draft EIR (pages 3.5-1 through 3.5-4), there is an inherent possibility of contaminated/impacted soils being encountered during removal of these facilities. Additionally, there is the potential for ACM, LBP, or PCBs to be present in the existing structures. The exposure of the public, including construction workers, to such upset conditions could be a significant impact if not handled in accordance with applicable regulatory requirements.

Impacts associated with the potential for encountering contaminated soils during construction are significant. In the event that contaminated soils are encountered during construction activities, Mitigation Measures HAZ-1 and HAZ-2 would be implemented so that appropriate measures are taken to ensure soils are properly excavated, treated or disposed. Mitigation Measure HAZ-3 would be implemented to require a pre-demolition survey for hazardous building materials such as ACM, LBP, and PCBs and compliance with appropriate regulatory requirements, should such materials be found to be present, which together will avoid significant impacts associated with unexpectedly encountering

ACM, LBP, or PCBs (i.e., would be mitigated to less than significant levels). (Draft EIR, p. 3.5-11)

n. NOISE AND VIBRATION

v. Significant Impacts Evaluated

- NOISE-2: Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? (Draft EIR, p. 3.8-27)

- NOISE-3: Would the project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Draft EIR, p. 3.8-32)

- NOISE-4: Would the project expose persons to, or generation of, excessive groundborne vibration or groundborne noise levels? (Draft EIR, p. 3.4-22)

vi. Proposed Mitigation

MM-NOISE-1: Noise Activity Prohibition

Prior to the issuance of the hotel occupancy permit, the Applicant shall demonstrate to the satisfaction of the Director of Planning and Community Development that the hotel regulations include a prohibition on the use of radios, televisions, "boom boxes", and similar devices in the pool area and other outdoor common areas unless the devices are used with headphones, ear buds, or similar devices. (Draft EIR, p. 3.8-31)

MM- NOISE-2: Restriction of Nighttime Outdoor Activities

Prior to the issuance of the hotel occupancy permit, the Applicant shall demonstrate to the satisfaction of the Director of Planning and Community Development that the hotel regulations include a prohibition on the use of the pool area between 10:00 p.m. and 5:00 a.m. and that signs with pool hours are posted at the pool area. (Draft EIR, p. 3.8-31)

MM- NOISE-3: Loading Dock Design

All Project outdoor loading docks and trash collection areas will be located or constructed such that the line of sight between these noise sources and any adjacent noise sensitive land use would be obstructed to the extent necessary so as to reduce noise to within 5 dBA above ambient (in terms of hourly Leq) as measured at the nearest off-site noise sensitive receptor. (Draft EIR, p. 3.8-31)

MM- NOISE-4: Access and Egress via Holliston for North and South Parcel

Prior to the issuance of an occupancy permits for Building A on the North Parcel and Building B on the South Parcel, the Applicant shall present data to the Director of Planning and Community Development consisting of signage, operating instructions, and other measures that would be implemented to:

(1) Prevent service truck access and egress at the Holliston Avenue driveway and prevent use of the Holliston Avenue loading dock between 10:00 p.m. and 7:00 a.m. for the North Parcel; and,

(2) Prevent service truck access and egress on Giddings Alley at the Holliston Avenue driveway between 10:00 p.m. and 7:00 a.m. for the South Parcel. (Draft EIR, p. 3.8-31)

MM-NOISE-5: Interior Noise Level

Prior to the issuance of each building permit, the Applicant shall present data to the Director of Planning and Community Development demonstrating that the interior noise level of hotel rooms facing Colorado Boulevard or Hill Avenue shall not exceed 45 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL). (Draft EIR, p. 3.8-34)

MM- NOISE-6: Vibration Monitoring of Historic Buildings

Prior to approval of grading plans and/or prior to issuance of demolition, grading and building permits, the project proponent shall retain a Professional Structural Engineer with experience in structural vibration analysis and monitoring for historic buildings and a Project Historical Architect (PHA) as a team to perform the following tasks:

- Review the project plans for demolition and construction.

- Survey the project site and the historic buildings occupied by the F. Suie One Antiques Store and the new car showroom, including geological testing, if required.

- Prepare and submit a report to the Director of Planning and Community Development that includes but is not limited to the following:

    - Any description/survey information obtained under the second bullet point.

    - Any modifications to the vibration level limits based on building conditions, soil conditions, and planned demolition and construction methods to ensure that vibration levels would remain below the potential for damage to the existing F. Suie One Antiques Store and the new car showroom.

    - Specific measures to be taken during construction to ensure the specified vibration level limits are not exceeded.

    - A monitoring plan to be implemented during demolition and construction that includes post-construction and post-demolition surveys of the existing F. Suie One Antiques Store and the new car showroom.

- Examples of measures that may be specified for implementation during demolition or construction include, but are not limited to the following:

    - Prohibition of certain types of construction equipment.

    - The requirement for lighter-tracked or wheeled equipment.

    - Specifying demolition by non-impact methods, such as sawing concrete.

    - Organization of phasing so as to avoid simultaneous vibration sources.

    - Installation of vibration-measuring devices to guide decision making for subsequent activities. (Draft EIR, pp. 3.8-37 and 3.8-38)

MM- NOISE-7: Secretary of the Interior's Standards

At the conclusion of vibration-causing activities, in the unanticipated event of discovery of vibration-caused damage, the Structural Engineer and the Project Historical Architect shall document any damage to the F. Suie One Antiques Store and the new car showroom and shall recommend necessary repairs. The Applicant shall be responsible for any repairs associated with vibration caused damage. Repairs shall be undertaken and completed, as required, to conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties (Code of Federal Regulations, Title 36, Section 68) and any other codes if applicable such as the California Historical Building Code (California Code of Regulations, Title 24, Part 8). (Draft EIR, p. 3.8-38)

MM- NOISE-8: Vibration Notification

At least 5 days prior to the start of construction, the project proponent shall notify property owners of occupied buildings located within 25 feet of the project site boundary that perceptible levels of construction-related vibration may be experienced periodically during the course of project construction. The notification shall include a brief description of the types of construction equipment and activities that may produce such vibration, the estimated duration of such activities including the anticipated start dates and end dates, and a contact name and phone number to contact with any questions. (Draft EIR, p. 3.8-39)

MM- NOISE-9: Vibration Mitigation Plan for Holliston Avenue Methodist Church

Prior to approval of grading plans and/or prior to issuance of demolition, grading, and building permits for the North Parcel, the Project proponent shall provide a detailed vibration analysis prepared by a Professional Structural Engineer with experience in structural vibration analysis demonstrating that use of the vibratory compaction equipment at the Project boundary closest to the Holliston Avenue Methodist Church building would not result in damage to the structure or the stained glass window units. To ensure constant monitoring of project activities causing vibration, it may be advantageous to install ground vibration monitoring equipment at the Church throughout the construction of the Project.
At the conclusion of vibration-causing activities, in the unanticipated event of discovery of vibration-caused damage, the Structural Engineer and the Project Historical Architect shall document any damage to the Holliston Avenue Methodist Church and shall recommend necessary repairs. The Applicant shall be responsible for any repairs associated with vibration caused damage. Repairs

shall be undertaken and completed, as required, to conform to the Secretary of the Interior's Guidelines for the Treatment of Historic Properties (Code of Federal Regulations, Title 36, Section 68) and any other codes if applicable such as the California Historical Building Code (California Code of Regulations, Title 24, Part 8). (Draft EIR, p. 3.8-39, as modified in the Final EIR, pp. 2-3 and 2-4)

MM- NOISE-10: Vibration-Limiting Measure

Prior to approval of grading plans and/or prior to issuance of demolition, grading, and building permits for the North Parcel, the following vibration-limiting measure identified in the construction plans or specifications shall be provided:

Vibratory rollers or similar vibratory compaction equipment shall not be used within 25 feet of the church complex buildings immediately adjacent to the North Parcel's northern boundary. Alternatively, the Applicant may provide a detailed vibration analysis prepared by a Professional Structural Engineer with experience in structural vibration analysis demonstrating that use of the vibratory compaction equipment at the project boundary closest to the adjacent church complex buildings would not result in a potential for structural damage. In the event this alternative means of satisfying the mitigation requirement is selected, the Applicant shall also include data and analysis confirming that the use of such equipment closer than 25 feet of the subject buildings will not result in construction-related vibration levels greater than 0.24 ppv in/sec at the building and, therefore, will not exceed the significance threshold for human annoyance for occupants therein. (Draft EIR, p. 3.8-39, as modified in the Final EIR, p. 2-4)

vii. 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.

viii. Supporting Explanation

Development of the proposed project would include a swimming pool located on the southwestern corner of the roof of a one-story portion of Building A near the on the North Parcel. Noise from the swimming pool area would not be heard at the sensitive receptors north and northwest of the pool area because the line of sight to the pool area would be blocked by portions of Building A that would be higher than the pool deck. The existing two-story building on the northeast corner of Colorado Boulevard and Holliston Avenue would block the line of sight (i.e., would serve as a noise barrier) from the pool

area to sensitive uses west of Holliston Avenue. Should a hotel-operated amplified music/sound system be included in the final design of the pool area, the operation of such a system could result in significant noise impacts to nearby areas; however, operation of such as system would be subject to the provisions of the City's noise restrictions and noise enforcement and penalties, which would reduce the impact to a level that is less than significant. Also, noise from other sources of amplified music, such as portable equipment brought into the pool area by hotel guests could be disturbing to adjacent residents; this would violate the general noise ordinance provision (Pasadena Ordinance 9.36.040B.) that prohibits noise that causes annoyance to persons of normal sensitiveness residing in the area and would be a significant impact. Similarly, noise from nighttime activities in the pool area after 10:00 p.m., when ambient noise levels during late night and early morning hours are typically at their lowest, and noisy activities are more noticeable and potentially disturbing to adjacent residents, would be a significant impact. To address these impacts, MM-NOISE-1 and MM NOISE-2 would be incorporated into the project. MM-NOISE-1 would prohibit the use of amplified noise equipment in the pool area, and MM-NOISE-2 would prohibit use of the pool area between 10:00 p.m. and 5:00 a.m. With the implementation of mitigation measures MM-NOISE-1 and MM-NOISE-2, the impact would be less than significant. (Draft EIR, pp. 3.8-30 and 3.8-31)

Vehicles would access the North Parcel from Hill Avenue, Holliston Avenue, and Colorado Boulevard. There would be an access road paralleling the northern site boundary between Hill Avenue and Holliston Avenue. There would also be loading docks adjacent to the access road at the Holliston Road driveway and near the Hill Avenue end of the road. As part of the project, a wall would be located along the northern boundary of the north parcel, which would block the line of sight between the western and eastern loading docks and the residents and church located to the north, thereby reducing noise level impacts. Heavy trucks servicing the hotel would access the South Parcel from Giddings Alley, which runs from Hill Avenue to Holliston Avenue. Based on measured noise levels from typical loading dock facilities, delivery trucks (while idling at the loading dock) could generate noise levels of approximately 71 dBA (Leq) at a distance of 50 feet from the noise source, which, in the absence of an intervening noise barrier/enclosure, would exceed the ambient noise level by 5 dBA resulting in a significant impact. However, implementation of mitigation measures MM-NOISE-3 and MM-NOISE-4, which would require the proposed project to locate and construct new buildings with loading docks and trash collection areas designed to incorporate partial or full enclosure of the loading areas and trash collection areas to provide shielding from off-site noise sensitive receptors to the extent necessary to comply with the City's Noise Ordinance and prohibit service truck use of the Holliston Avenue driveway and adjacent loading dock between 10:00 p.m. and 7:00 a.m. This would reduce impacts to a less than significant level. (Draft EIR, pp. 3.8-30 and 3.8-31)

The existing noise levels on the North and South Parcels adjacent to Colorado Boulevard and on the North Parcel adjacent to Hill Avenue are estimated at 68 dBA CNEL. The existing noise level is 71 dBA CNEL when combined with the noise of the adjacent intersection of Colorado Boulevard and Hill Avenue. Traffic noise impacts to proposed land uses are based on anticipated future noise levels because noise levels are anticipated to increase over time as traffic volumes increase. As described on pages 3.8-32 and 3.8-33 of the Draft EIR, the future noise environment for hotel use at the project is classified as follows: for the rooms facing Holliston Avenue, the noise level would be less than 60 dBA CNEL, which is Clearly Acceptable for hotel uses; for the rooms facing Colorado Boulevard and Hill Avenue, except those rooms near the intersection of Colorado Boulevard and Hill Avenue, the noise level would be between 65 and 70 dBA CNEL, which is Normally Acceptable for hotel use; and, for the rooms with full exposure to both Colorado Boulevard and Hill Avenue (i.e. near this intersection), the noise level would be between 70 and 75 dBA CNEL, which is Conditionally Acceptable for hotel use. Because the architectural details have not been developed specifying the noise reduction for the hotel rooms and whether the interior noise levels would be acceptable, the roadway noise impacts to the hotel rooms in the Normally Acceptable and Conditionally Acceptable areas are considered at this time to be significant. To ensure compliance with the State law and the City General Plan guidelines, mitigation measure MM-NOISE-5 would be included in the project, requiring the Applicant to demonstrate that noise reduction design components have been incorporated in order to ensure that no significant impacts would occur relative to the hotel rooms facing Colorado Boulevard and Hill Avenue (i.e., impact would be mitigated to a less than significant level). (Draft EIR, p. 3.8-34)

Project-related demolition that would occur immediately adjacent to the historic structure housing the F. Suie One Antiques Store could create vibration levels that exceed the 0.12 ppv in/sec significance threshold for damage. This would include loaded trucks and jackhammer operation, or similar equipment, at a distance of approximately 10 feet or less, as well as vibratory rollers at a distance of 36 feet or less. Because the exact limits of equipment use, types of equipment to be used, and soil conditions are not known, it is considered that, without mitigation, vibration generated during construction could result in structural damage, therefore impacts are considered significant to the F. Suie One Antiques Store and the H.G. Loud Autos Showroom. Implementation of mitigation measures MM-NOISE-6 and MM-NOISE-7 would reduce impacts to the F. Suie One Antiques Store building and the H.G. Loud Autos Showroom to a less than significant level. MM-NOISE-6 includes measures to be implemented prior to, during, and following construction, and MM-NOISE-7 would require that an unanticipated vibration-related damage to the F. Suie One Antiques Store and/or the H.G. Loud Autos Showroom be repaired in a manner consistent with the Secretary's Standards. Additionally, Mitigation Measure MM-NOISE-8 provides for notification to

nearby property owners of the potential for perceptible vibration to be experienced during the course of project construction. (Draft EIR, p. 3.8-36)

The historic Holliston Avenue Methodist Church is located approximately 70 feet west of the project site and contains substantial amounts of stained glass windows along the facades that face the project site. Given the fragile nature of the stained glass windows, it is conservatively assumed that construction-related vibration could damage those windows and impacts would be significant without mitigation; therefore, Mitigation Measure MM-NOISE-9 is identified for that specific impact, which would reduce the impact to a less than significant level. (Draft EIR, p. 3.8-37)

Demolition, grading, and construction activities may occur as close as 15 feet from the church complex buildings adjacent to the North Parcel's northern boundary. Vibration levels may exceed the 0.25 ppv in/sec structural damage threshold value if vibratory compaction would occur at distances less than 25 feet, or more precisely, at a distance of 22 feet of less, of the building. Therefore, impacts are considered significant related to structural damage and annoyance. Implementation of mitigation measure MM-NOISE-10 would reduce impacts to the subject buildings to a less than significant level. Mitigation measure MM NOISE-10 would limit the use of vibratory compaction equipment within 25 feet of the subject buildings or would provide a detailed vibration analysis showing that structural damage would not occur. Because the significance thresholds for structural damage and human annoyance are similar, implementation of MM-NOISE-10 would also reduce annoyance impacts to less than significant. (Draft EIR, p. 3.8-37, as modified in the Final EIR on p. 2-4)

Cumulative Impacts

Growth in the study area from future development projects in the vicinity has the potential to increase ambient noise levels. With implementation of mitigation measures, as described above, construction and operation of the proposed project would not result in a significant increase in noise or vibration. The closest planned project to the proposed project site is located at 151 South Hill Avenue. This project involves improvement or expansion to an existing church. The related project is located approximately 530 feet from the South Parcel and at a sufficient distance that the proposed project in combination with other development projects in the City does not have the potential to result in a significant cumulative impact or to considerably contribute to significant cumulative impacts relative to a temporary increase in noise.

The geographic scope of vibrational impacts 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 0.210 (in/sec) at 25 feet, which would not exceed to the significance threshold of 0.25 (in/sec) for historic structures. Therefore,

the geographic scope would be generally limited to approximately 25 feet, and there are no reasonably foreseeable projects which would result in vibrations within this distance. The closest planned project to the proposed project site is located at 151 South Hill Avenue, approximately 530 feet from the project site. Therefore, the proposed project in combination with other development projects in the City does not have the potential to result in a significant cumulative impact or to considerably contribute to significant cumulative impacts relative to a temporary increase in vibration.

While the proposed project is anticipated to result in significant impacts that would be mitigated to a less than significant level related to increases in ambient noise levels, noise exposure, and vibrations, operations of new or renovated buildings in the project vicinity are not anticipated to increase the ambient noise level. Review of the cumulative traffic increase shows less than a doubling of traffic on the roads near the project. Therefore, the proposed project in combination with other development projects in the City does not have the potential to result in significant cumulative impacts (i.e., impacts would be less than significant) or to considerably contribute to significant cumulative impacts.

In summary, the proposed project in combination with other development projects in the City does not have the potential to result in significant cumulative impacts (i.e., impacts would be less than significant) or to considerably contribute to significant cumulative impacts relative to a temporary or permanent increase in noise or vibration. (Draft EIR, p. 3.8-40)

o. TRANSPORTATION AND TRAFFIC

i. Significant Impacts Evaluated

- TRAFFIC-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? (Draft EIR, p. 3.10-25)

- TRAFFIC-4: Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? (Draft EIR, p. 3.10-30)

ii. Proposed Mitigation

MM-T-1: Proximity and Quality of Bicycle Network

To mitigate the project's reduction of service population with access to Level 1 and Level 2 bicycle facilities, the applicant shall, prior to issuance of a grading permit, contribute its fair share of funds toward the Union Street Cycle Track Complete Streets Project found in the City's FY 2016 – 2020 Capital Improvement Program. The project's fair share contribution will be determined by multiplying the ratio of the service population of the project over the service population within a quarter mile of the Union Street Cycle Track with the total cost of the Union Street Cycle Track Complete Streets project, as follows:

((Proposed Project's Service Population)/(Service Population within a 1/4 mile of the USCTCS))×(Total Cost of the USCTCS). (Draft EIR, pp. 3.10-26 and 3.10-27, as modified in the Final EIR, pp. 2-4 and 2-15)

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.

iv. Supporting Explanation

The Pasadena Department of Transportation conducted an analysis of the proposed project's transportation impacts based on the measures of effectiveness identified within the City's Traffic Impact Analysis guidelines using the City's calibrated travel demand forecasting (TDF) model. The model takes into account the project's vehicular and non-vehicular trip making characteristics, trip length, and interaction with surrounding and citywide land uses and the City's transportation network. The results of the analysis indicated that implementation of the proposed project would not exceed the applicable criteria relative to vehicle miles of travel (VMT) per capita, vehicle trips (VT) per capita, proximity and quality of the transit network, and pedestrian accessibility; however, the project would decrease the service population's accessibility to bicycle facilities. Specifically, with project implementation, the Citywide service population with accessibility to bicycle facilities would be 31.4 percent, a decrease of 0.3 percent. As the project would decrease the existing Citywide service population located within one-quarter mile of existing bicycle facilities, this impact would be significant. Implementation of MM-T-1, which requires the project to contribute its fair share of funds toward the Union Street Cycle Track Complete Streets Project, would reduce the

significant impact relative to bicycle facilities to less than significant levels. (Draft EIR, pp. 3.10-26 and 3.10-27).

V. CEQA FINDINGS ON ALTERNATIVES

The Draft EIR analyzed four alternatives, including the No Project alternative. These Alternatives are described in Section 4 of the Draft EIR. CEQA only requires a project to reduce impacts to a less than significant level. (CEQA Guidelines Section 15041, 15126.4(a)(3) and 15126.6(b).) The City has incorporated mitigation measures into the project that reduce and avoid all impacts to a less than significant level. Therefore, CEQA Findings for these Alternatives are not required under CEQA Guidelines Section 15091(a). Nevertheless, the City Council declares that the City has considered and rejected as infeasible the alternatives described in the subsections below as infeasible.

The Final EIR identified objectives for the project as follows (see Draft EIR, pp. 2.13 and 2-14):

The primary objectives for the proposed project include the following:

- Create a premier destination complex that complements the surrounding businesses.
- Assist in satisfying the demand for hotel rooms in the City and the region.
- Create a vibrant entrance to one of the City's academic gateways in an urban context that encourages pedestrian-oriented and non-motorized transportation.
- Improve the local economy and the City's tax base by retaining and adding high-quality jobs in Pasadena.
- Strategically place street level retail in areas with significant pedestrian activity to help integrate the college area to the commercial area west of Hill Street.
- Improve the streetscape and create active sidewalks along Hill Street, Colorado Boulevard, and Holliston Street.

Additional objectives of the proposed project are to:

- Complement and enhance the College District of the East Colorado Specific Plan by implementing the goals and supporting the objectives of the General Plan's Land-Use and Mobility Elements by:
    - Providing a compatible mixture of retail, commercial and service uses that are pedestrian friendly and that encourage walkability throughout the site.

- Supporting the existing major corridor on Colorado Boulevard and South Hill Street and reinforce the importance of Colorado Boulevard as an employment node by providing commercial developments in proximity to one another; and,
- Develop an underutilized site that will attract and retain businesses while promoting local job growth east of the Central District.

- Support the goals of transit-oriented development (TOD) by:

  - Creating a higher density walkable mixed-use environment;
  - Creating mobility options for the residents and visitors;
  - Providing the minimal amount of required parking stalls encouraging the use of convenient public transit routes and the reduction of auto dependency;
  - Optimizing use of the existing transit infrastructure; and
  - Encouraging the "park once" strategy by providing active sidewalk environments that encourage walking to nearby amenities such as Pasadena City College (PCC), Cal-Tech, art and entertainment districts and the adjacent educational, commercial and governmental districts.

- Promote building forms that respect the local context and interface with adjacent properties.

- Strategically place underground parking, landscaped gardens, courtyards, and walkways to create a pedestrian-friendly environment for the public and create a pleasant walk that connects the PCC campus with the commercial area west of Hill Street.

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

a. Alternatives Considered But Rejected

The City Council finds that all of the alternatives eliminated from further consideration in the Final EIR are infeasible, would not meet the basic project objectives, and/or would not reduce or avoid any of the significant effects of the proposed project for the following reasons:

Reestablish North Parcel as a New Car Dealership – The project site had a long history of having operated as a new car dealership, with that past role being part of a thematic historic grouping. Implementation of this alternative could preserve most, if not

all, of the existing structures at the site and reestablish the character of the site as being that of a new car dealership. Given, however, that the northern parcel has remained largely vacant for the past seven years and, although the types of buildings and infrastructure suitable for an automobile dealership are present on site, there appears to be no market for such a use at the site. The alternative of reestablishing the project site as a new car dealership is considered infeasible.

Alternative Site – Under this alternative, the uses that are currently proposed for the project would be developed at an alternative site. While such an alternative would avoid the project related impacts at the project site that are described in Section 3 of the Draft EIR, including the demolition and removal of all structures on-site, except for the former new car showrooms, it would provide no assurance that such impacts might not still occur from some other development concept at the project site in the future. As described in the Draft EIR (p. 4-7), it is unrealistic to anticipate that the project site would remain in its current condition indefinitely into the future. Additionally, development of the proposed uses at an alternative site poses the potential for unavoidable significant impacts that would otherwise not occur under the current proposal. The alternative site scenario was rejected as infeasible.

b. Alternative 1 – No Project Alternative

Pursuant to Guidelines Section 15126.6, the EIR discussed a No Project Alternative. Under the No Project Alternative, the proposed project would not be implemented and it is assumed that the North Parcel would be redeveloped for retail sales and restaurant uses, as permissible under the existing zoning designation for the site, utilizing the existing buildings onsite to the extent feasible and occupying the same amount of building area that currently exists onsite – 34,500 square feet. The South Parcel would continue to be used for vehicle sales and leasing, as it has been in the past and is currently occupied by such a use.

As summarized in Table 4-1 on page 4-5 of the Draft EIR, implementation of Alternative 1 would, in general, result in some environmental impacts being similar to the proposed project, such as those related to land use and planning and public services, and some environmental effects would be reduced, such as those related to air quality, cultural resources, greenhouse gases, hazards and hazardous materials, noise and vibration, and utilities and services. Implementation of the No Project Alternative would result in comparatively greater/worse impacts related to hydrology and water quality, and would result in unavoidable significant impacts related to transportation and traffic. As discussed in Section 3 of the Draft EIR, and summarized in Table ES-1 of the Draft EIR (Draft EIR, pp. ES-7 through ES-11), all significant environmental impacts associated with the proposed project can be reduced to a less

than significant level with the implementation of mitigation measures. As such, implementation of Alternative 1, the No Project Alternative, would not reduce any significant, unmitigable impacts associated with the proposed project to a level that is less than significant, and, instead, would result in unavoidable significant impacts that would not otherwise occur with the project. (Draft EIR, p. 4-5)

Implementation of the No Project Alternative would not respond to the primary objectives of the proposed project, such as redeveloping the project parcels in a manner that achieves a reasonable return on investment, creating a premier destination complex that complements the surrounding businesses, assisting in satisfying the demand for hotel rooms in the City and the region, creating a vibrant entrance to one of the City's academic gateways in an urban context that encourages pedestrian-oriented and non-motorized transportation, and improving the local economy and the City's tax base by retaining and adding high-quality jobs in Pasadena. (Draft EIR, p. 4-11)

For CEQA purposes, this alternative is rejected because it would result in an unavoidable significant impact that would not occur with the proposed project, and this alternative would not meet any of the project objectives.

c. Alternative 2 – Reduced Project

Under the Reduced Project Alternative, the nature and mix of uses under this alternative would be the same as that of the proposed project; however, the intensity and the amount of development (i.e., square footage of building floor area) and building heights would be reduced. As such, this alternative represents a "reduced project." Specifically, the total amount of development under Alternative 2 would be 243,650 square feet – a 44 percent reduction compared to the proposed project, with a total of 290 hotel rooms, compared to current proposal for 525 rooms, and the building heights would be limited to three stories compared to proposed maximum of seven stories.

As summarized in Table 4-1 on page 4-5 of the Draft EIR, implementation of Alternative 2 would, in general, result in some environmental impacts being similar to the proposed project, such as those related to cultural resources, hazards and hazardous materials, hydrology and water quality, noise and vibration, public services, and transportation and traffic, and some environmental effects would be reduced, such as those related to air quality, greenhouse gases, land use and planning, and utilities and services. More specifically, Implementation of Alternative 2, the Reduced Project Alternative, could reduce some environmental impacts when compared to the proposed project, given that the amount of development under Alternative 2 is about 56 percent of the amount of development that would otherwise occur under the proposed project;

however, indirect impacts related to air quality, transportation, and GHG could be greater.

As discussed in Section 3 of the Draft EIR, and summarized in Table ES-1 of the Draft EIR (Draft EIR, pp. ES-7 through ES-11), all significant environmental impacts associated with the proposed project can be reduced to a less than significant level with the implementation of mitigation measures. As such, implementation of Alternative 2 would not reduce any significant, unmitigable impacts associated with the proposed project to a level that is less than significant.

Implementation of Alternative 2, the Reduced Project Alternative, would provide for only about 56 percent of the amount of development that would otherwise occur with the project. As such, it would not meet many of the project objectives to the same extent as the project, including as related to creating a premier destination complex that complements the surrounding businesses, assisting in satisfying the demand for hotel rooms in the City and the region, creating a vibrant entrance to one of the City's academic gateways in an urban context that encourages pedestrian-oriented and non-motorized transportation, improving the local economy and the City's tax base by retaining and adding high-quality jobs in Pasadena, supporting the existing major corridor on Colorado Boulevard and South Hill Street and reinforce the importance of Colorado Boulevard as an employment node by providing commercial developments in proximity to one another, developing an underutilized site that will attract and retain businesses while promoting local job growth east of the Central District, supporting the goals of transit-oriented development (TOD) by creating a higher density walkable mixed-use environment.

This alternative is rejected because it does not provide substantial advantages over the project (i.e., it would not reduce any unmitigable significant effects of the project), and it would not fulfill the project objectives to the same extent as the proposed project as outlined above.

d. Alternative 3 – Hotel on North Parcel-Residential Efficiency Units/Student Housing and Retail on South Parcel

Under this alternative, the nature and amount of development occurring in the North Parcel would remain the same as what is currently proposed – hotel and retail uses (i.e., 375 hotel rooms and related uses plus approximately 16,400 square feet of ground-level retail for a total of 349,100 square feet); however development of the South Parcel would consist of 100 housing units, in the form of either "efficiency unit" apartments (i.e., small units such as single-room occupancy [SRO] apartments) or student housing, and ground-floor retail uses (approximately 80,000 square feet of

residential uses plus 10,000 square feet of ground level commercial space). The total amount of development under Alternative 3 would be approximately 440,000 square feet, the same as the proposed project. Under Alternative 3, the development approach to the North Parcel includes the option to either retain the former new car showrooms, as would occur with the proposed project, or demolish and remove the former new car showrooms and allow height averaging for a taller structure at the subject site while not changing the nature and amount of development proposed on the North Parcel (i.e., in removing the single-story showrooms structure, a new multi-story structure would be constructed at that location and the building height(s) in other portions of the North Parcel would be reduced, compared to what is currently proposed, to not increase the amount of proposed development).

As summarized in Table 4-1 on page 4-5 of the Draft EIR, implementation of Alternative 3 would, in general, result in environmental impacts being similar to the proposed project, with the one notable exception that implementing the option to remove the former auto showrooms under this alternative would result in an unmitigable significant impact on historic resources that would not occur with the proposed project.

Implementation of Alternative 3 would provide for a mixed-use development that generally responds to all of the project objectives.

For CEQA purposes, Alternative 3 with the option to remove the former auto showrooms is rejected because it would result in an unavoidable significant impact that would not occur with the proposed project; however, Alternative 3 with the option to retain the former auto showrooms is not rejected, as its environmental impacts are generally comparable to those of the proposed project and is considered to be a feasible alternative.

e. Alternative 4 – Mixed-Use Residential and Commercial Development

Under this alternative, mixed-use development including residential units and commercial uses would occur on both the North Parcel and the South Parcel. While scale of development, relative to the amount of development (i.e., square footage of building floor area) and building heights, under this alternative would be approximately the same as that of the proposed project, the nature and mix of uses would be different. More specifically, 200 residential units covering 311,300 square feet of floor area would occur on the North Parcel under Alternative 4 compared to 375 hotel rooms and related uses in that same amount of floor area, and Alternative 4 would include 37,800 square feet of commercial retail uses whereas the proposed project provides for an approximately 12,500 square foot ballroom, approximately 8,900 square feet of conference room space, and approximately 16,400 square feet of ground level retail. In

the South Parcel, Alternative 4 provides 50 residential units covering approximately 80,000 square feet of floor area compared to the proposed project's 150 hotel rooms in that same amount of floor area, and both development scenarios proposed approximately 10,000 square feet of ground-level commercial space.

As summarized in Table 4-1 on page 4-5 of the Draft EIR, implementation of Alternative 4 would, in general, result in some environmental impacts being similar to the proposed project, such as those related to cultural resources, hazards and hazardous materials, hydrology and water quality, land use and planning, noise and vibration, public services, and transportation and traffic, and some environmental effects would be greater, such as those related to air quality and greenhouse gases. However, like the project, air quality and greenhouse gas impacts would remain less than significant under this alternative, and all significant impacts would be reduced to a less than significant level with the imposition of mitigation measures. Alternative 4, the Mixed-Use Residential and Commercial Alternative, would, in general, not reduce environmental impacts as compared to the proposed project.

For CEQA purposes this alternative as a whole is rejected because it does not provide substantial advantages over the project (i.e., it would not reduce any unmitigable significant effects of the project) and it would not fulfill the basic project objective of assisting in satisfying the demand for hotel rooms in the City and the region. However, the South Parcel portion of this alternative combined with the North Parcel portion of the proposed project would fulfill the basic project objectives and would result in environmental impacts that are comparable to those of the proposed project. Therefore, the South Parcel portion of Alternative 4 is considered to be feasible when combined with the North Parcel portion of the proposed project.

VI. CEQA FINDINGS ON 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. Generally, 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).

Nonrenewable resources used during the construction of the project include construction materials and fossil fuels to power construction equipment. Additionally, approximately 3.65 acres of urban land, formerly used for auto-related services but now vacant, would be redeveloped with uses of a higher intensity than what previously occurred at the site. During operation of the project, water as well as energy resources in the form of natural gas and electricity would be required. Impacts would also result from the incremental increase in vehicular traffic, and the associated air emissions. However, as discussed in Section 3.11, Utilities and Service Systems, of Draft EIR, impacts associated with increased resource use and consumption for would not be significant. Nonetheless, the resources utilized for the proposed project would be permanently committed to the project and therefore be considered irreversible. (Draft EIR, pp. 5-1 and 5-2)

VII. CEQA FINDINGS ON GROWTH-INDUCING IMPACTS

State CEQA Guidelines Section 15126.2(d) requires an EIR to discuss the ways in which the 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.

During project construction, a temporary increase in the number of workers associated with the construction of the project would occur in the short-term. Upon completion of construction, the project would provide new employment opportunities within the central area of the City. Based on the SCAG 2012 RTP/SCS, adopted by SCAG in April 2015, employment in the City of Pasadena is forecast to grow at a healthy pace between now and 2035, with approximately 19,952 additional jobs occurring within the City between 2013 and 2035. The new jobs associated with the proposed project would support that projection of a substantial increase in employment within Pasadena over the upcoming years. The growth associated with the proposed project would not result in significant environmental impacts beyond those identified in the analysis included in Section 3 of the Draft EIR. Therefore, construction and operation of the proposed project do not have the potential to result in significant growth-inducing impacts. (Draft EIR, p. 5-2)

VIII. ADOPTION OF MITIGATION MONITORING AND REPORTING PROGRAM

Pursuant to Public Resources Code Section 21081.6, the City Council hereby adopts the Mitigation Monitoring and Reporting Plan ("MMRP") attached to this Resolution as Attachment #1, and incorporated herein. This MMRP includes all of the

mitigation measures analyzed in the EIR that are applicable to the proposed project, Alternative 3, and Alternative 4.

IX. CUSTODIAN OF RECORDS

The documents and materials that constitute the record of proceedings on which these findings are based are located at the City of Pasadena, Planning & Community Development Department at 175 North Garfield Avenue, Pasadena, California 91101 and with the Director of Planning & Community Development, who serves as the custodian of these records.

X. NOTICE OF DETERMINATION

Staff is directed to file a Notice of Determination with the Clerk of the County of Los Angeles within five working days of final approval of the project as may be modified by any necessary approvals and conditions of approval imposed by the City Council.

Adopted at the _____ meeting of the City Council on the _____ day of _____, 2016 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

_____
Mark Jomsky, CMC
City Clerk

APPROVED AS TO FORM:

_____
Theresa E. Fuentes
Assistant City Attorney

Attachment #1

MITIGATION MONITORING AND REPORTING PROGRAM

Section 4

Mitigation Monitoring and Reporting Program

A Mitigation Monitoring and Reporting Program (MMRP) describes the procedures that will be followed to implement the mitigation measures adopted in connection with the approval of the proposed project and the methods for monitoring such actions. The MMRP has been prepared in conformance with Section 21081.6 of the California Environmental Quality Act (CEQA). The intent of the program is to (1) verify satisfaction of the required mitigation measures of the EIR; (2) provide a methodology to document implementation of the required mitigation; (3) provide a record of the monitoring program; (4) identify monitoring responsibility; (5) establish administrative procedures for the clearance of mitigation measures; (6) establish the frequency and duration of monitoring; and (7) utilize existing review processes wherever feasible. A MMRP is necessary only for impacts which would be significant if not mitigated. The following table consists of the mitigation measures associated with the proposed project and provides and entry for each measure that notes the timing of the measure, the responsible entity for mitigation monitoring, an entry to record when the mitigation measure was completed, and the measures effectiveness.

This page is intentionally left blank.

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Monitor/ Reporter/ Monitoring Agency	Documentation of Compliance		
				Action/Reports	Effectiveness	Sign-off/Date
Air Quality						
MM-AQ-1: Tier 3 Emission Standards. All off-road engines during construction shall meet the Tier 3 emission standards during the building construction phase for both the North and South Parcels.	Construction Contractor	During construction	Department of Planning and Community Development			
MM-AQ-2: Diesel Particulate Filters. All off-road diesel engines during construction must be equipped with diesel particulate filters capable of reducing PM10 and PM2.5 emissions by at least 50 percent the uncontrolled emission rate of the construction equipment.	Construction Contractor	During construction	Department of Planning and Community Development			
Cultural Resources						
MM-CR-1: Historic American Building Survey Documentation. The applicant shall be responsible for preparing documentation of the H.G. Loud Autos site (North Parcel) using the Historic American Building Survey (HABS) Level III standards as the guideline for recording the building through photographs, drawings and a written description. The HABS documentation shall be reviewed and approved by the City of Pasadena Department of Planning and Community Development: Design and Historic Preservation Section staff as a condition of approval of the project and prior to issuance of a demolition permit. The following documentation shall be prepared to document and record the historic resource: a. Written Data: Additional research shall be performed to document the history of the site and the auto-related businesses located therein dating from the early twentieth-century. The additional research shall be used to gain a more complete understanding of the history of the auto industry in Pasadena, and the use of the International Style architecture for the various brands of automobiles and their dealerships in Pasadena and Los Angeles County. b. Drawings: Under HABS Level III, if the original	Project Applicant	Prior to issuance of demolition permit	Department of Planning and Community Development, Design and Historic Preservation Section			

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Monitor/ Reporter/ Monitoring Agency	Documentation of Compliance		
				Action/Reports	Effectiveness	Sign-off/Date
drawings of the H. G. Loud Autos complex prepared by Sylvanus Marston are available, they shall be reproduced in ink on Mylar. If the original drawings/plans for the H. G. Loud Autos complex cannot be located, then sketch plans depicting the floorplans of the current conditions of the buildings and structures shall be prepared by a licensed architect. A copy of the current site plan shall be included with the sketch drawings of the floorplans. The current condition drawings shall be reproduced on Mylar, and in digital format. c. Photographs: Under HABS Level III, a representative number of large-format photographs and negatives shall be produced to capture interior and exterior views of each building and structure of the H. G. Loud Autos complex on the North Parcel. The large format photos shall be supplemented with color digital photographs to fully document the property. At least four large format photographs shall be taken to show the property's setting in context, and in relationship to, its location on East Colorado Boulevard. d. Document: The HABS Level III document shall be produced on archival-quality paper, and all large format photographs and negatives labeled to HABS standards. The HABS document shall be donated to the archives of the Pasadena Museum of History.						
MM-CR -2: Interpretive Display Presenting Site History. The applicant will be responsible for a "history of the automobile in Pasadena" interpretive display that shall be available for public viewing in one of the remaining showroom sections of the H. G. Loud Autos complex. The interpretive display shall present a history of the site and the significance of the International Style of architecture to the automobile-related industry of Pasadena. The interpretive display shall be prepared by a qualified Historian, Architectural Historian, or organization (such as the Peterson Automotive Museum or California Route 66 Museum) with experience in	Project Applicant	Design and content shall be approved prior to issuance of demolition permit Installation shall be completed and inspected prior to a certificate of occupancy for the	Department of Planning and Community Development: Design and Historic Preservation Section			

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Monitor/ Reporter/ Monitoring Agency	Documentation of Compliance		
				Action/Reports	Effectiveness	Sign-off/Date
creating such materials for educational purposes. The design and content of the interpretive display shall be approved by the City of Pasadena Department of Planning and Community Development: Design and Historic Preservation Section staff prior to demolition activities on the project site.		showroom building				
MM-CR -3: Preservation, Restoration, Adaptive Use Plan. The applicant shall be responsible for developing a Preservation, Restoration, Adaptive Reuse plan for the rehabilitated showroom portions of the showroom-administration-repair buildings and for the relocation/restoration of the "Welcome" sign. The showrooms shall be rehabilitated to serve alternative use/s for the proposed Project, and the "Welcome" sign shall be installed within one of the showroom spaces or in another place visible from Colorado Boulevard. Suggested reuses of the showrooms, such as to include an interpretive display, are discussed in MM-CR-2. The rehabilitation shall follow the Secretary of the Interior's Guidelines for the Treatment of Historic Properties, and the services of a Historic Architect or Architectural Historian who meets the Secretary of the Interior's Standards for Professionals and who has sufficient experience with using the Guidelines shall be retained to assist the project team to develop a Preservation, Restoration, Adaptive Use Plan. As part of the rehabilitation program, a Historic Structures Report (HSR) shall be prepared to document current conditions and present proposed alterations to the building per the Guidelines.	Project Applicant	Prior to issuance of demolition permit	Department of Planning and Community Development, Design and Historic Preservation Section			
MM-CR-4: Photodocumentation. Prior to any construction activities, the applicant will be responsible to have a qualified Architectural Historian or Historic Architect prepare a photodocumentation of the exterior of the F. Suie One Antiques Store building. A set of detailed photographs of exterior facades will be used to assist in the repair of any unanticipated vibration-caused or other construction-related damage (see also MM-	Project Applicant	Prior to issuance of demolition permit	Department of Planning and Community Development, Design and Historic Preservation Section			

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Monitor/ Reporter/ Monitoring Agency	Documentation of Compliance		
				Action/Reports	Effectiveness	Sign-off/Date
NOISE-6, MM-NOISE-7, and MM-NOISE-9 regarding mitigation of construction-related vibration damage to historic structures).						
MM-CR-5: Repair of Construction-Related Damage to Showroom. In the event of unanticipated construction-related damage to the historic showroom sections of the project, the applicant shall be responsible for restoring the buildings to their historic appearance by application of the Secretary of the Interior's Guidelines for the Treatment of Historic Properties. Project management shall retain the services of a historic architect or architectural historian who meets the Secretary of the Interior's Standards for Professionals, and has at least 10 years of experience with using the Guidelines, to assist the project team to develop a restoration plan of the showrooms.	Project Applicant	During construction	Department of Planning and Community Development, Design and Historic Preservation Section			
MM-CR–6: Paleontologist Retained during Construction. A qualified Paleontologist shall be notified and retained when earth-moving activities are anticipated to impact undisturbed deposits in the Older Quaternary Alluvium on the project site. The Paleontologist shall be present during the pre-grade meeting to discuss paleontological sensitivity and to assess whether scientifically important fossils have the potential to be encountered. The schedule and extent of monitoring activities shall be determined at the meeting in consultation with the City of Pasadena. Although exact depths are not possible to determine at this time, Older Alluvium is typically present below five feet from current ground surface; therefore, monitoring will likely be needed where undisturbed Older Alluvium occurs below five feet. This will be more definitively assessed at the pre-grading meeting. If any scientifically important large fossil remains are uncovered during earth-moving activities, the Paleontologist shall divert heavy equipment away from the fossil site until s/he has had an opportunity to examine and remove the remains. Samples of Older Quaternary Alluvium shall be collected for processing and examination for very	Construction Contractor	During grading/ excavation	Department of Planning and Community Development			

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Monitor/ Reporter/ Monitoring Agency	Documentation of Compliance		
				Action/Reports	Effectiveness	Sign-off/Date
small vertebrate fossils. All paleontological work to assess and/or recover a potential resource at the project site shall be conducted under the direction of the qualified Paleontologist. Any fossils recovered during Project site development, along with their contextual stratigraphic data, shall be donated to an appropriate institution with an educational and research interest in the materials. The Paleontologist shall prepare a report of the results of any findings as part of a testing/mitigation plan following accepted professional practice.						
Hazards and Hazardous Materials						
MM-HAZ-1: Encountering Contaminated Soil. If soil is encountered during project construction that is identified or suspected of being impacted by hazardous materials (on the basis of staining, chemical odors, or other evidence), work at the subject construction activity area will be halted and the suspect site conditions will be evaluated by a qualified environmental professional. The results of the evaluation will be submitted to the Pasadena Fire Department (PFD), the Department of Toxic Substances Control (DTSC), and/or the California Regional Water Quality Control Board (RWQCB), if/as appropriate, and the necessary response/remedial measures will be implemented, as directed by DTSC, RWQCB, LACoFD, PFD, or other applicable oversight agency, until all specified requirements of the oversight agencies are satisfied and a no-further action status determination is attained, if/as appropriate.	Construction Contractor	During grading/ excavation	Department of Planning and Community Development, Fire Department			
MM-HAZ-2: Clarifier and UST Removal and Closure. Prior to the issuance of a grading permit, all subgrade clarifiers and underground storage tanks shall be removed and closed to current regulatory standards, in accordance with all Pasadena Fire Department (PFD) regulations, and shall also include compliance with SCAQMD Rule 1166 relative to monitoring for, and management of, soils contaminated by VOC's	Construction Contractor	During demolition and grading/excavation	Department of Planning and Community Development, Fire Department			

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Monitor/ Reporter/ Monitoring Agency	Documentation of Compliance		
				Action/Reports	Effectiveness	Sign-off/Date
associated with such facilities. SCAQMD Rule 1166 requirements include, but are not limited to, monitoring for VOCs during excavation and grading activities and, if VOC-contaminated soil is detected (i.e., soils with VOC concentrations of 50 parts per million (ppm) or more as measured at a distance of three inches), such materials must be reported, segregated, treated and/or removed from the project site within 30 days.						
MM-HAZ-3: PCB, Asbestos, and Lead-Based Paint Surveys. Prior to demolition or renovation of any on-site structures, a survey shall be performed to identify any Polychlorinated Biphenyls (PCBs), asbestos containing materials (ACM) and lead-based paint (LBP) within existing structures following U.S. Environmental Agency Guidance for Controlling Asbestos-Containing Materials in Buildings (1985) survey guidelines. If PCBs, ACM, and/or LBP are found, the compounds shall be removed or otherwise abated prior to demolition or renovation. Removal and abatement activities shall comply with all applicable laws, regulations, and rules established by federal, state, and local standards, including, but not limited to, those set forth by CalOSHA regulations, and SCAQMD regulations for the excavation, removal, and proper disposal of ACMs and LBP.	Construction Contractor	Survey: Prior to demolition or renovation Removal/Abatement: During demolition and renovation	Department of Planning and Community Development, Building & Safety Division			
Noise and Vibration						
MM-NOISE-1: Noise Activity Prohibition. Prior to the issuance of the hotel occupancy permit, the Applicant shall demonstrate to the satisfaction of the Director of Planning and Community Development that the hotel regulations include a prohibition on the use of radios, televisions, "boom boxes", and similar devices in the pool area and other outdoor common areas unless the devices are used with headphones, ear buds, or similar devices.	Applicant	Prior to issuance of hotel occupancy permit	Department of Planning and Community Development			
MM- NOISE-2: Restriction of Nighttime Outdoor Activities. Prior to the issuance of the hotel occupancy permit, the Applicant shall demonstrate	Applicant	Prior to issuance of hotel	Department of Planning and Community			

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Monitor/ Reporter/ Monitoring Agency	Documentation of Compliance		
				Action/Reports	Effectiveness	Sign-off/Date
to the satisfaction of the Director of Planning and Community Development that the hotel regulations include a prohibition on the use of the pool area between 10:00 p.m. and 5:00 a.m. and that signs with pool hours are posted at the pool area.		occupancy permit	Development			
MM- NOISE-3: Loading Dock Design. All Project outdoor loading docks and trash collection areas will be located or constructed such that the line of sight between these noise sources and any adjacent noise sensitive land use would be obstructed to the extent necessary so as to reduce noise to within 5 dBA above ambient (in terms of hourly Leq) as measured at the nearest off-site noise sensitive receptor.	Applicant	Prior to issuance of building permits	Department of Planning and Community Development			
MM- NOISE-4: Access and Egress via Holliston for North and South Parcel. Prior to the issuance of an occupancy permits for Building A on the North Parcel and Building B on the South Parcel, the Applicant shall present data to the Director of Planning and Community Development consisting of signage, operating instructions, and other measures that would be implemented to: 1. Prevent service truck access and egress at the Holliston Avenue driveway and prevent use of the Holliston Avenue loading dock between 10:00 p.m. and 7:00 a.m. for the North Parcel; and prevent service truck access and egress on Giddings Alley at the Holliston Avenue driveway between 10:00 p.m. and 7:00 a.m. for the South Parcel.	Applicant	Prior to issuance of occupancy permits	Department of Planning and Community Development			
MM-NOISE-5: Interior Noise Level. Prior to the issuance of each building permit, the Applicant shall present data to the Director of Planning and Community Development demonstrating that the interior noise level of hotel rooms facing Colorado Boulevard or Hill Avenue shall not exceed 45 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL).	Applicant	Prior to issuance of building permits	Department of Planning and Community Development			
MM- NOISE-6: Vibration Monitoring of Historic Buildings. Prior to approval of grading plans and/or prior to issuance of demolition, grading and building	Applicant	Prior to approval of grading plans and/or prior to	Department of Planning and Community			

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Monitor/ Reporter/ Monitoring Agency	Documentation of Compliance		
				Action/Reports	Effectiveness	Sign-off/Date
permits, the project proponent shall retain a Professional Structural Engineer with experience in structural vibration analysis and monitoring for historic buildings and a Project Historical Architect (PHA) as a team to perform the following tasks: • Review the project plans for demolition and construction. • Survey the project site and the historic buildings occupied by the F. Suie One Antiques Store and the new car showroom, including geological testing, if required. • Prepare and submit a report to the Director of Planning and Community Development that includes but is not limited to the following: o Any description/survey information obtained under the second bullet point. o Any modifications to the vibration level limits based on building conditions, soil conditions, and planned demolition and construction methods to ensure that vibration levels would remain below the potential for damage to the existing F. Suie One Antiques Store and the new car showroom. o Specific measures to be taken during construction to ensure the specified vibration level limits are not exceeded. o A monitoring plan to be implemented during demolition and construction that includes post-construction and post-demolition surveys of the existing F. Suie One Antiques Store and		issuance of demolition, grading and building permits	Development			

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Monitor/ Reporter/ Monitoring Agency	Documentation of Compliance		
				Action/Reports	Effectiveness	Sign-off/Date
the new car showroom. Examples of measures that may be specified for implementation during demolition or construction include, but are not limited to the following: • Prohibition of certain types of construction equipment. • The requirement for lighter-tracked or wheeled equipment. • Specifying demolition by non-impact methods, such as sawing concrete. • Organization of phasing so as to avoid simultaneous vibration sources. • Installation of vibration-measuring devices to guide decision making for subsequent activities.						
MM- NOISE-7: Secretary of the Interior's Standards. At the conclusion of vibration-causing activities, in the unanticipated event of discovery of vibration-caused damage, the Structural Engineer and the Project Historical Architect shall document any damage to the F. Suie One Antiques Store and the new car showroom and shall recommend necessary repairs. The Applicant shall be responsible for any repairs associated with vibration caused damage. Repairs shall be undertaken and completed, as required, to conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties (Code of Federal Regulations, Title 36, Section 68) and any other codes if applicable such as the California Historical Building Code (California Code of Regulations, Title 24, Part 8).	Applicant	At the conclusion of vibration-causing activities.	Department of Planning and Community Development			
MM- NOISE-8: Vibration Notification. At least 5 days prior to the start of construction, the project proponent shall notify property owners of occupied buildings located within 25 feet of the project site boundary that perceptible levels of construction-related vibration may be experienced periodically during the course of project construction. The notification shall include a brief description of the	Construction contractor	At least 5 days prior to the start of construction	Department of Planning and Community Development			

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Monitor/ Reporter/ Monitoring Agency	Documentation of Compliance		
				Action/Reports	Effectiveness	Sign-off/Date
types of construction equipment and activities that may produce such vibration, the estimated duration of such activities including the anticipated start dates and end dates, and a contact name and phone number to contact with any questions.						
MM- NOISE-9: Vibration Mitigation Plan for Holliston Avenue Methodist Church. Prior to approval of grading plans and/or prior to issuance of demolition, grading, and building permits for the North Parcel, the Project proponent shall provide a detailed vibration analysis prepared by a Professional Structural Engineer with experience in structural vibration analysis demonstrating that use of the vibratory compaction equipment at the Project boundary closest to the Holliston Avenue Methodist Church building would not result in damage to the structure or the stained glass window units. To ensure constant monitoring of project activities causing vibration, it may be advantageous to install ground vibration monitoring equipment at the Church throughout the construction of the Project. At the conclusion of vibration-causing activities, in the unanticipated event of discovery of vibration-caused damage, the Structural Engineer and the Project Historical Architect shall document any damage to the Holliston Avenue Methodist Church and shall recommend necessary repairs. The Applicant shall be responsible for any repairs associated with vibration caused damage. Repairs shall be undertaken and completed, as required, to conform to the Secretary of the Interior's Guidelines for the Treatment of Historic Properties (Code of Federal Regulations, Title 36, Section 68) and any other codes if applicable such as the California Historical Building Code (California Code of Regulations, Title 24, Part 8).	Applicant	Prior to approval of grading plans and/or prior to issuance of demolition, grading and building permits	Department of Planning and Community Development			
MM- NOISE-10: Vibration-Limiting Measure. Prior to approval of grading plans and/or prior to issuance of demolition, grading, and building permits for the North Parcel, the following vibration-limiting	Construction contractor	Prior to approval of grading plans and/or prior to issuance of	Department of Planning and Community Development			

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Monitor/ Reporter/ Monitoring Agency	Documentation of Compliance		
				Action/Reports	Effectiveness	Sign-off/Date
measure identified in the construction plans or specifications shall be provided: Vibratory rollers or similar vibratory compaction equipment shall not be used within 25 feet of the church complex buildings immediately adjacent to the North Parcel's northern boundary. Alternatively, the Applicant may provide a detailed vibration analysis prepared by a Professional Structural Engineer with experience in structural vibration analysis demonstrating that use of the vibratory compaction equipment at the project boundary closest to the adjacent church complex buildings would not result in a potential for structural damage. In the event this alternative means of satisfying the mitigation requirement is selected, the Applicant shall also include data and analysis confirming that the use of such equipment closer than 25 feet of the subject buildings will not result in construction-related vibration levels greater than 0.24 ppv in/sec at the building and, therefore, will not exceed the significance threshold for human annoyance for occupants therein.		demolition, grading and building permits.				
Traffic and Transportation						
MM-T-1: Proximity and Quality of Bicycle Network To mitigate the project's reduction of service population with access to Level 1 and Level 2 bicycle facilities, the applicant shall, prior to issuance of a grading permit, contribute its fair share of funds toward the Union Street Cycle Track Complete Streets Project found in the City's FY 2016 – 2020 Capital Improvement Program. The project's fair share contribution will be determined by multiplying the ratio of the service population of the project over the service population within a quarter mile of the Union Street Cycle Track with the total cost of the Union Street Cycle Track Complete Streets project, as follows: ((Proposed Project's Service Population)/(Service Population within a 1/4 mile of the USCTCS))×(Total	Project Applicant and City of Pasadena Department of Transportation	Prior to issuance of grading permit	Department of Planning and Community Development, Building & Safety Division; Department of Transportation			

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Monitor/ Reporter/ Monitoring Agency	Documentation of Compliance		
				Action/Reports	Effectiveness	Sign-off/Date
Cost of the USCTCS)						