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## VI. OTHER ENVIRONMENTAL CONSIDERATIONS

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### A. SIGNIFICANT IRREVERSIBLE CHANGES

According to Section 15126.2(c) of the CEQA Guidelines, an EIR is required to evaluate significant irreversible environmental changes that would be caused by implementation of the proposed Project. As stated in CEQA Guidelines Section 15126.2(c):

*“[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”*

The proposed Project would necessarily consume limited, slowly renewable and non-renewable resources. This consumption would occur during the construction phase of the proposed Project and would continue throughout its operational lifetime. Project development would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the project site. Construction would require the use and consumption of non-replenishable or non-renewable resources, such as: certain types of lumber and other forest products, raw materials in steel, metals such as copper and lead, aggregate materials such as sand and stone used in concrete and asphalt, petrochemical construction materials such as plastics, and water. Construction vehicles and equipment, and the transportation of goods and people to and from the project site would also use nonrenewable fossil fuels such as gasoline and oil.

Project operation would require use of nonrenewable resources similar to existing uses on the site and other developed areas within the City of Pasadena. These include energy resources such as electricity, petroleum-based fuels, fossil fuels, and water. Energy resources would be used for heating and cooling buildings, transportation within the project site, and building lighting. Fossil fuels are the primary energy source for Project construction and operation. This existing, finite energy source would thus be incrementally reduced. Under Title 24, Part 6 of the California Code of Regulation, conservation practices limiting the amount of energy consumed by the proposed Project is required during operation. In addition, Leadership in Energy and Environmental Design (LEED) standards would be incorporated into the Project that would

reduce greenhouse gas emissions while also reducing energy and water usage through building efficiency measures and reductions in vehicle trips. Despite conservation practices and guidelines in energy conservation, commitment to the use of the nonrenewable resources would be long-term.

Limited use of potentially hazardous materials such as typical cleaning agents and pesticides for landscaping would be used and contained on-site. These hazardous materials would be used, handled, stored, and disposed of in accordance with manufacturer's instructions and applicable government regulations and standards. Compliance with these regulations and standards would serve to protect against significant and irreversible environmental change resulting from the accidental release of hazardous materials. In addition, demolition activities would comply with regulatory requirements to ensure that asbestos and lead-based paints are not released into the environment. Compliance with such regulations would serve to protect against a significant and irreversible environmental change resulting from the accidental release of hazardous materials. Similarly, mitigation has been included to address any hazardous materials discovered during construction.

Project construction and operation would be committed to the use of slowly renewable and nonrenewable resources and would limit the availability of these resources and the proposed Project's building site for future generations or for other uses during the life of the proposed Project. However, the continued use of such resources would be on a relatively small scale and consistent with regional and local urban design and development goals for the area. As a result, the nonrenewable resources would not result in significant irreversible changes to the environment.

## **B. GROWTH-INDUCING IMPACTS**

Section 15126.2(d) of the CEQA Guidelines requires that an EIR analyze growth-inducing impacts of a project. Growth-inducing impacts are characteristics of a project that could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the area surrounding a project site. Impacts associated with the removal of obstacles to growth as well as the development of facilities that encourage and facilitate growth are considered to be growth-inducing. However, as stated in the CEQA Guidelines, it is not to be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The proposed Project would replace existing uses on the project site and would constitute infill development within a highly urbanized area. As such, the proposed Project would have limited growth inducing effects. The proposed Project would not involve any extension of

infrastructure, such as roads or utilities. Consequently, it would not open up undeveloped areas to new development.

As the project site is located within the South Fair Oaks Specific Plan (Specific Plan), implementation of the proposed Project would be consistent with the land use objectives for the area to accommodate technology-based industries, particularly within the biomedical field. Adopted in April 1998, the Specific Plan would facilitate the transition from the area's history of traditional or earlier industrial uses to biotech development due to the proximity of such institutions as the adjacent Huntington Memorial Hospital and the nearby California Institute of Technology (Caltech). Under the Specific Plan, a total of 1,550,000 square feet of non-residential square footage has been projected for Plan buildout. As a proposed office building, the proposed Project is a permitted land use within the Specific Plan area and would not exceed these buildout projections for the Specific Plan area.

The proposed project would not involve the construction of housing in the area. As an infill development within an urban area, the proposed project would involve the build out of a site in conformance to the City's existing land use and zoning regulations. The proposed Project would result in 113,200 gross square feet of office floor area, with an increase of approximately 355 employees.<sup>1</sup> While this increase in employment may bring new residents into the area, the increase in population and the potential need for housing and associated services is not considered significant. A number of these employees are likely to already reside in the general area or within a reasonable commuting distance. To the extent that some employees may choose to relocate in the City or nearby, this demand is not expected to be substantial and could be served by existing available housing and rental opportunities as well as other housing that is planned or under construction in the area. As a result, with existing vacancies and housing already proposed for development, it is not expected the increase in employees that do not already reside in the area would induce substantial growth in the form of new housing and infrastructure.

Although the proposed Project would not foster population growth, it could result in economic growth in the surrounding area as it would contribute to the overall economic success of the City and Specific Plan area. The Project would expand the City's commercial base as well as improve the City's tax base, which would be a beneficial impact.

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<sup>1</sup> *In the Employment Density Report prepared by the Natelson Company, Inc., an economic consulting firm, employment generation factors were derived from SCAG employment database and from Floor Area Ratio (FAR) figures obtained from Assessor's Parcel records. As a result, these employment generation factors were established from ten different land use categories within the Los Angeles region. To determine the number of employees for the proposed project conditions, the land use categories of "Low-Rise Office" were used to assess the future project condition. Based on the employee generation factor for "Low-Rise Office" (3.13 employees/1000 s.f.), a total of 355 employees were projected for the project (3.13 employees/1000 s.f. x 113,200 s.f.= 355 employees).*

The proposed Project would be located in an urban area, well-served by existing infrastructure. No new water, sewer, or drainage infrastructure would be needed and no new roads would be required. Because the proposed Project constitutes infill development within an urbanized area and does not require the extension of new infrastructure through undeveloped areas, project implementation would not remove an obstacle to growth.

### **C. EFFECTS FOUND NOT TO BE SIGNIFICANT**

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the proposed Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each topical area is or is not analyzed further in the Draft EIR. As further described in the Initial Study, the proposed Project was determined not to have the potential to cause significant impacts in regards to aesthetics, agricultural resources, biological resources, energy, geology and soils, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, utilities including wastewater and solid waste.

### **D. SIGNIFICANT UNAVOIDABLE IMPACTS**

Section 15126.2(b) of the CEQA Guidelines requires an EIR to describe significant environmental impacts that cannot be avoided and impacts that can be mitigated but not reduced to a less than significant level. The following is a summary of impacts associated with the 16 E. California Project that were concluded to be significant and unavoidable. The following impacts are described in detail in Section IV, Environmental Impact Analysis of this ~~Draft~~ EIR.

**Air Quality:** As analyzed in Section IV.A, Air Quality, even with the incorporation of all feasible mitigation measures, during construction, the Project would remain in exceedance of the SCAQMD regional significance thresholds of NO<sub>x</sub> during Phase 2 (mass site grading). Therefore, regional construction emissions resulting from the Project would result in a significant short-term impact. Implementation of the prescribed mitigation measures would reduce construction NO<sub>x</sub> emissions. However, even with implementation of mitigation measures, construction emissions would exceed the SCAQMD regional significance thresholds for NO<sub>x</sub> during the Phase 2 (mass site grading) construction period. As such, regional construction NO<sub>x</sub> emissions would result in a significant and unavoidable impact.

Please refer to Section IV.A, Air Quality, of this ~~Draft~~ EIR for further discussion of this topic.

**Traffic:** As analyzed in Section IV.D, Traffic, the Project would increase daily traffic on Pico Street between Raymond Avenue and Edmondson Alley by 8.2 percent. Although daily traffic volumes on the street would remain modest under the 2010 With Project condition, and the adjacent intersection at Raymond Avenue is projected to operate smoothly at LOS A during both peak hours, the estimated 8.2 percent increase in daily traffic on Pico Street would be a significant impact requiring mitigation based on the City's street segment significance threshold. However, Pasadena DOT has determined that there are no feasible physical mitigation measures to reduce the segment impact on Pico Street to below levels of significance. Physical mitigation measures such as capacity enhancement would not change the outcome of estimated increase in traffic. Furthermore, physical prohibition of project trips from the alley to Pico Street would have a detrimental impact on traffic circulation of the adjacent streets. Pico Street is a discontinuous local street between Fair Oaks Avenue and the Gold Line tracks to the east. The current traffic volumes on Pico Street are insignificant and expected to increase moderately in the future. Although mitigation is provided for a contribution to the citywide traffic monitoring program to purchase and install two traffic monitoring stations on Pico Street, the proposed mitigation measure would not fully mitigate the impact along Pico Street and, as such, the impact would be significant and unavoidable.

#### **E. REASONS WHY THE PROJECT IS BEING PROPOSED, NOTWITHSTANDING SIGNIFICANT UNAVOIDABLE IMPACTS**

Section 15126.2(b) also requires a description of the reasons why the Project is being proposed, notwithstanding significant unavoidable impacts associated with the Project. The reasons why this Project has been proposed are grounded in a comprehensive listing of Project objectives included in Section II, Project Description, of this ~~Draft~~ EIR. The underlying purpose of the proposed Project is to enhance the future economic growth and vitality of the Specific Plan area through the development of an urban office building that would encourage growth in new technology-based industries. Furthermore, the Project would redevelop an underutilized site containing several deteriorating, single-story structures with a modern mid-rise office building. To increase walkability and transit opportunities, the contemporary building design would incorporate pedestrian friendly and community enhancing features such as a landscaped plaza at the intersection of California Boulevard and Fair Oaks Avenue and parkway improvements along the Project's street frontage.

The proposed Project would provide employment opportunities for those who live in the community. The Project site is located near residential communities including recent housing developments within the vicinity. The proposed Project is also located in an area that is within walking distance to both bus and light rail transit (Gold Line) options as an alternative to commuting by automobile. In doing so, the proposed Project would be consistent with the goals of the community in minimizing traffic impacts and air quality impacts, as well as meeting

economic growth and employment needs. Furthermore, due to the Project's strategic site planning and the open building design, ample open space is provided along the parkway and public right-of-way to enhance the walkability of the neighborhood and foster a pedestrian-friendly environment.

Several alternatives to the proposed Project were considered in Section V, Alternatives, of this ~~Draft~~ EIR. Among those alternatives, no feasible alternative was identified that would reduce the significant unavoidable effect associated with the Project's short-term air quality impacts during construction (see Section V, Alternatives, above). In addition, none of the alternatives would achieve the objectives to the extent of the proposed Project. Since the No Project/No Build Alternative would not meet the underlying purpose of the proposed Project, it is not considered a feasible development alternative.

In addition to the environmental reasons why the Project has been proposed as cited above, there are economic and urban planning reasons in support of the proposed development. The proposed Project would transform a historically industrial area and strengthen the Specific Plan's competitive position as a hub for regional commerce and activity by providing a modern office building to facilitate the transition from a traditional manufacturing and industrial economy to an emerging technology-based economy such as biomedical, computer software or digital entertainment and communication industries. Additionally, the proposed Project would generate additional annual sales tax revenues to the City of Pasadena and provide increased employment opportunities, up to approximately 355 jobs.

## **F. POTENTIAL SECONDARY EFFECTS**

Section 15126.4(a)(1)(D) of the CEQA Guidelines requires mitigation measures to be discussed in less detail than the significant effects of the proposed Project if the mitigation measure(s) cause one or more significant effects in addition to those that would be caused by the proposed Project. In accordance with the CEQA Guidelines, proposed Project mitigation measures that could cause potential impacts were evaluated. The following provides a discussion of the potential secondary effects that could occur as a result of implementing Project mitigation measures.

### **1. Air Quality**

Mitigation Measures A-1 through A-5 pertain to construction and include standard measures such as the implementation of a fugitive dust control program, maintaining construction equipment, implementing construction best management practices to reduce exhaust emissions, and other energy saving practices. Implementation of these construction mitigation measures would occur on a temporary basis and would not result in secondary impacts.

## **2. Cultural Resources**

### **a. Historic Resources**

Mitigation Measure B-1 requires that the pole-mounted sign and a wall-mounted sign presently situated at 592 S. Fair Oaks Avenue be documented in large format black-and-white photographs and written narrative in accordance with HABS Level III standards. Mitigation Measure B-2 requires the proper removal and relocation of the pole-mounted sign and the wall-mounted sign to a suitable off-site repository or collection, preferably within Pasadena or within the Los Angeles Metropolitan area to assist the general public and interested parties in understanding the history of neon signage in the Los Angeles region. Implementation of these mitigation measures would assure that information that contributes to the history of the City of Pasadena is retained. Implementation of these mitigation measures would not result in secondary impacts.

### **b. Archaeological and Paleontological Resources**

Mitigation Measures B-3 through B-8 require that a paleontologist monitor excavation activities in the event that resources are discovered, and that such resources be collected and preserved, as appropriate. Mitigation Measures B-9 through B-11 require that an archaeologist and Native American monitor be present during excavation activities. In the event that such resources are discovered during construction activities, such resources should be collected, preserved, and documented, as appropriate. Mitigation Measure B-11 specifically requires that if human remains are encountered unexpectedly during construction excavation and grading activities that no further disturbance occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. Implementation of Mitigation Measures B-3 through B-11 would not result in secondary impacts.

## **3. Noise**

Mitigation Measures C-1 through C-4 address construction-related noise impacts. These mitigation measures require the Project to perform on-site operations during the permissible daily hours for construction, provide effective noise control devices on noise-generating construction equipment, reduce engine idling from construction equipment to the extent feasible, and minimize the use of simultaneous construction equipment. Implementation of these mitigation measures would not result in physical changes that would create secondary impacts.

#### **4. Transportation**

Mitigation Measure D-1 relates to increased traffic volumes on Pico Street associated with the proposed Project. The mitigation measure includes an applicant contribution to the citywide traffic monitoring program to monitor and manage traffic along this roadway segment. Implementation of this mitigation measure would reduce traffic impacts to less than significant, and no secondary impacts would result from their implementation.

#### **5. Hazards and Hazardous Materials**

Mitigation Measure E-1 requires the Project Applicant to conduct an asbestos survey in accordance with SCAQMD Rule 1403 prior to demolition activities on the project site, subject to review and approval by the City's Building and Safety Division. Mitigation Measure E-2 requires the Project Applicant to submit verification to the City of Pasadena Building and Safety Division that a lead-based paint survey has been conducted for all existing buildings located on the project site. Mitigation Measure E-3 requires the Project Applicant to ensure that prior to initiating grading on the site all contractors are aware of the potential for discovery of underground storage tanks (USTs), as well as former above ground storage tanks, or remnants thereof, in the subsurface. In the event USTs or former above ground storage tanks are encountered, work in the immediate area shall be halted and the Pasadena Fire Department shall be contacted to ensure that proper procedures are established and followed for their removal. Mitigation Measure E-4 requires the Project Applicant and the responsible parties to develop a management plan for the handling and disposal of contaminated soil and/or groundwater that may be encountered during excavation of the proposed Project for review and approval by the City of Pasadena Building and Safety Division.

These measures have been designed to ensure that no significant impacts would occur during grading and construction activities, as well as during project operation. Implementation of these mitigation measures would not result in secondary impacts.

#### **6 Water Supply**

Implementation of Mitigation Measure F-1 would result in a 20 percent reduction of water usage over normal baseline usage through installation of water-efficient fixtures as part of the project building performance. Implementation of Mitigation Measure F-2 would conserve water usage by the Project by incorporating landscape plans that require less water and irrigation systems that are more efficient. These measures would not result in direct physical changes to the environment, and, as such, its implementation would not cause potential secondary effects on the environment.