

State Clearinghouse Number: 2013101060

**FINAL ENVIRONMENTAL IMPACT REPORT**  
City of Pasadena  
Planning & Community Development Department



**Hill and Colorado  
Project**

August 2016

**CDM  
Smith**



# Table of Contents

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<b>Section 1 Summary</b> .....	<b>1-1</b>
<b>Section 2 Clarifications, Revisions, and Corrections</b> .....	<b>2-1</b>
<b>Section 3 Comments and Responses</b> .....	<b>3-1</b>
3.1 List of Commenters .....	3-1
3.2 Responses to Comments .....	3-2
3.2.1 Written Comments on the Draft EIR .....	3-2
Letter No. 1 Governor's Office of Planning and Research .....	3-7
Letter No. 2 Governor's Office of Planning and Research .....	3-21
Letter No. 3 California Department of Transportation .....	3-23
Letter No. 4 California Department of Transportation .....	3-35
Letter No. 5 Los Angeles County Metropolitan Transportation Authority .....	3-46
Letter No. 6 County Sanitation Districts of Los Angeles County .....	3-52
Letter No. 7 Pasadena Heritage .....	3-56
Letter No. 8 Grace Lutheran Church .....	3-59
Letter No. 9 Holliston United Methodist Church .....	3-65
Letter No. 10 Walter Choi .....	3-72
Letter No. 11 Richard McDonald .....	3-78
3.2.2 Comments Received at the Public Hearing on Draft EIR .....	3-81
<b>Section 4 Mitigation Monitoring and Reporting Program</b> .....	<b>4-1</b>

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# Section 1

## Summary

### Introduction

In accordance with the *California Environmental Quality Act (CEQA)*, specifically, *CEQA Guidelines* Sections 15088, 15089, and 15132, the City of Pasadena (the City) has prepared the Final Environmental Impact Report (EIR) for the proposed Hill and Colorado Project (proposed project or project). A Final EIR is defined by Section 15132 of the *CEQA Guidelines* as “containing the information contained in the Draft EIR; comments, either in verbatim or in summary received in the review process; a list of persons commenting; and the responses of the Lead Agency to the comments received.” As such, this Final EIR incorporates by reference the entire Draft EIR, including the clarifications, revisions, and corrections reflected in Section 2 herein.

The Final EIR is organized in the following sections:

- **Section 1 – Summary:** This Section is intended to provide a summary of the CEQA requirements, including Project Location, Setting and Description information, Alternatives to the Project, Areas of Controversy, Issues to be Resolved and a Summary of the Project Impacts and Mitigation Measures.
- **Section 2 – Clarifications, Revisions, and Corrections:** This Section identifies any revisions made to clarify and/or correct the text within the Draft EIR as a result of either comments received from interested parties during the public review period or as initiated by the Lead Agency (City of Pasadena or City). Note: Subsequent to the publication of the Final EIR on April 13, 2016, minor text corrections related to two items have been added to Section 2. One textual item pertains to Table S-2, where the delineation of historic resource impacts of Alternative 3 compared to those of the proposed project were inadvertently transposed, and the other item pertains to the identification of existing land uses located north of the North Parcel, where such uses include Prism Church, which was inadvertently omitted from the text, along with Grace Lutheran Church, which was identified in the text. The subject corrections have been incorporated into the Final EIR presented herein. Revisions to the April 2016 Final EIR that are presented in this updated Final EIR are delineated through the use of double-underlined text for additions and double-strikethrough text for deletions (i.e., ~~deletions~~). In addition to text corrections, several figures from the Draft EIR have been corrected to more accurately reflect the boundaries of the North Parcel and the surrounding land uses. The corrections are minor in nature and do not change the conclusions of the Draft EIR.
- **Section 3 – Comments and Responses:** This Section includes all comments received on the Draft EIR during the document’s 67-day public review period, which began on October 13, 2015 and was completed on December 18, 2015. A list of public agencies, organizations, and individuals who submitted comments on the Draft EIR is provided. Responses to comments received on the Draft EIR have been prepared and are included in this Section of this Final EIR.
- **Section 4 – Mitigation Monitoring and Reporting Program:** This Section includes a list of all mitigation measures for the project and identifies the timing associated with, and entity

responsible for, implementing each mitigation measure in a table format. Space is provided within the table for tracking mitigation implementation and effectiveness.

This document, along with the Draft EIR (incorporated by reference), make up the Final EIR.

## Uses of the Final EIR

The Final EIR allows the public and the decision makers the opportunity to review revisions to the Draft EIR, the comments and responses to those comments, and other components of the EIR, such as the Mitigation Monitoring and Reporting Program, prior to approval of the project. The Final EIR serves as the environmental document to support approval of the proposed project, either in whole or in part.

After completing the Final EIR, and before approving the project, the Lead Agency must make the following three certifications as required by Section 15090 of the *CEQA Guidelines*:

- That the Final EIR has been completed in compliance with CEQA;
- That the Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the project; and
- That the Final EIR reflects the Lead Agency's independent judgment and analysis.

## Background

### Draft EIR Published October 13, 2015

The Draft EIR for the Hill and Colorado Project was published on October 13, 2015, and was circulated for a 67-day public comment period, including an 18 day extension to the close of the review period, which is 22 days longer than the 45 days typically provided for a Draft EIR comment period. Public notice was mailed to property owners and occupants within 500 feet of the project site and to all individuals requesting notice for this and all other EIRs within the City of Pasadena, including all parties that commented on the Notice of Preparation. Public notice was also posted at the office of the Los Angeles County Clerk and was sent to the State Clearinghouse (a division of the Governor's Office of Planning and Research). The Draft EIR public review period provided interested public agencies, groups, and individuals the opportunity to comment on the contents and accuracy of the document. Copies of the Draft EIR were made available to the public at the City's Planning Division counter, the Pasadena Libraries (Central Library and Hill Avenue Branch), and posted online. The public comment period for the Draft EIR ended on December 18, 2015. In addition to written comments received during the 67-day review period, oral comments were taken at the Planning Commission public hearing held on November 11, 2015. Public comments on the Draft EIR received by the City are included in this Final EIR, and responses to those comments have been prepared to address the concerns raised.

A total of 11 written comment letters were received on the Draft EIR during the original and extended review periods. A list of commenters is provided below. The comment letters have been numbered and organized into the following categories:

- Public Agencies;

- Private and Local Organizations; and
- Individuals.

The original bracketed comment letters are provided followed by a numbered response to each bracketed comment. Individual comments within each letter are numbered and the response is given a matching number. Additionally, a summary of the oral comments occurring at the City of Pasadena Planning Commission public hearing of November 11, 2015, and responses to those comments, are included herein.

Where responses to comments on the Draft EIR result in changes to the Draft EIR, these changes are noted and the resulting changes are identified in Section 2, Clarifications, Revisions, and Corrections Additions, of this Final EIR document.

## Project Location and Setting

The project site comprises 3.64 acres along East Colorado Boulevard between Holliston and Hill Avenues in the City of Pasadena, Los Angeles County, California. The City of Pasadena (City) is located approximately 10 miles northeast of the City of Los Angeles in the San Gabriel Valley portion of Los Angeles County. Regional access to the City is provided by State Route 134 (SR 134), Interstate 210 (I-210 or Foothill Freeway), State Route 110 (SR110), and Interstate 710 (I-710). The project site encompasses two noncontiguous parcels; one parcel located at 1355 East Colorado Boulevard and 39 North Hill Avenue (North Parcel) and the other parcel at 1336 East Colorado Boulevard (South Parcel). The North Parcel is generally bound by Hill Avenue on the east, Colorado Boulevard on the south, and Holliston Avenue on the west. The South Parcel is located in the northwestern portion of the block bound by Hill Avenue to the east, Green Street to the south, Holliston Avenue to the west, and Colorado Boulevard to the north. The project site is currently used periodically as vehicle sales and storage areas and/or seasonal sales lots for pumpkin patches and Christmas trees; however, prior to 2008, the site was occupied by the former Pasadena Ford dealership. The majority of the project site is located within the College District of the East Colorado Specific Plan area, and is zoned ECSP-CG-2 (East Colorado Specific Plan, Sub-district 2), while the northwest portion of the North Parcel is outside of the East Colorado Specific Plan and is zoned RM-48 PK. The General Plan land use designation applicable to the project site is Medium Mixed Use.<sup>1</sup>

The project site is located within a developed area of Pasadena on one of the City's main commercial streets and is surrounded by residential, commercial, retail, and institutional land uses. More specifically, the northern edge of the North Parcel is bordered by the Prism Church and the Hill Avenue Grace Lutheran Church complex. To the west of the North Parcel and located on the same block as the proposed project is a building that houses a mix of uses, including an antiques dealership, private offices, and residences. Across Holliston Avenue to the west, is Holliston Avenue Methodist Church and additional multi-family residential units. To the south of the North Parcel, across Colorado

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<sup>1</sup> The project site's General Plan Land Use designations at the time the EIR Notice of Preparation was released were "Specific Plan" and "Medium-High Density Residential. On August 18, 2015, the City Council approved an update to the General Plan, whereby the General Plan land use designation for most of the project site changed to Medium Mixed Use. On January 25, 2016, the Pasadena City Council adopted Resolution No. 9480, a clean-up item, to designate the remainder of the project site Medium Mixed Use. As such, the properties comprising the north and south parcel now have a land use designation of Medium Mixed Use.

Boulevard, is the South Parcel, as well as a Chevron gas station. Southeast of the North Parcel is Pasadena City College and southwest of the North Parcel is a McDonald's restaurant. To the east of the North Parcel, across Hill Avenue, are commercial uses. The South Parcel is located in the northwestern portion of the block bound by Hill Avenue to the east, Green Street to the south, Holliston Avenue to the west, and Colorado Boulevard to the north. Within the same block as the South Parcel is a Chevron gas station, a surface parking lot utilized by Pasadena City College students, and the Hill Avenue Branch Library. More broadly, other uses surrounding the subject block include the North Parcel, churches and multi-family residences to the north; parking and multi-family residences as well as a childhood development center to the south; commercial and multi-family residences to the west; and Pasadena City College to the east.

## Project Characteristics

The following summarizes the characteristics of the proposed project, as described in more detail in Section 2 of the Draft EIR. The proposed project includes the development of two hotels (one on each of the North and South Parcels), comprising up to 525 guest rooms and 26,400 square feet of commercial space. In total, implementation of the proposed project would provide approximately 440,000 square feet of building space at the project site for uses currently allowed or conditionally allowed under the existing zoning (i.e., the East Colorado Specific Plan) as the project characteristics are further described below.

### North Parcel

The development proposed for the North Parcel includes construction and operation of full-service hotel within an approximately 350,000 square foot building ("Building A"). The hotel would include up to 375 guest rooms with related services (approximately 312,000 square feet), a ballroom (approximately 12,500 square feet), conference rooms (approximately 8,900 square feet) and commercial retail uses (approximately 16,400 square feet). Consistent with the proposed Planned Development District standards for varied massing, the building would range in height from a minimum of two stories up to a maximum of five stories (58 feet from ground level) along the roadway frontages. In the interior of the site, portions of the proposed building would be up to seven stories (78 feet from ground level). A portion of the roof would have architectural features and rooftop bar and pool, resulting in a maximum overall height of 90 feet. The proposed FAR would be 2.72. Two levels of subterranean parking would be provided within the North Parcel to accommodate up to 700 vehicles. Vehicle access to the site would be provided from multiple locations. Along Hill Avenue, a driveway is proposed within proximity of the northern property line, which would provide access to the subterranean parking. Along East Colorado Boulevard, a driveway serving as the drop-off/pick-up to the hotel, as well as valet service, would be centered approximately 150 feet away from the intersection of East Colorado Boulevard and Hill Avenue. Access to the subterranean parking would also be provided at this location.

### South Parcel

The development proposed for the South Parcel includes construction and operation of an approximate 90,000 square-foot hotel and commercial use building ("Building B") that would range from three to four stories in height and have a FAR of 2.98. The building would have a maximum height of 48 feet and provide two levels of subterranean parking that could accommodate up to 150 vehicles. The ground floor would encompass approximately 10,000 square feet devoted to, but not limited to, retail, restaurant, and other non-residential uses consistent with the adopted uses allowed within this area of the East Colorado Specific Plan. The remaining approximate 80,000 square feet

would be devoted to a hotel with up to 150 rooms. Vehicle access to the site would be provided by an existing alley located to the rear of the property.

## Alternatives to the Project

CEQA requires that an EIR describe a range of reasonable alternatives to a proposed project that could feasibly avoid or lessen any significant environmental impacts, while attaining the basic objectives of the project. The alternatives analyzed in this EIR are summarized below, with a more detailed description and impacts analysis of the alternatives presented in Section 4 of the Draft EIR.

- Alternative 1 – No Project:

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.

- 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.

- 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, 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).

- 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.

Two other alternatives were considered but rejected as infeasible, as described in Section 4 of the Draft EIR.

## Summary of Impacts and Mitigation Measures

A summary of the environmental impacts associated with implementation of the proposed project and mitigation measures (MM) included to avoid or lessen the severity of potentially significant environmental impacts, and residual impacts, is provided in **Table S-1, Summary of Project Impacts, Mitigation Measures, and Residual Impacts**, below. **Table S-2 Comparison of Alternatives to the Proposed Project**, also presented below, provides a summary the impacts of the aforementioned alternatives in comparison to the impacts of the proposed project.

**Table S-1 Summary of Project Impacts, Mitigation Measures, and Residual Impacts**

Significant Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<b>Air Quality</b>		
<b>AIR-1.</b> The proposed project would not conflict with implementation of the applicable air quality plan.	No mitigation is required	No impact
<b>AIR-2.</b> The proposed project could violate any air quality standard or contribute substantially to an existing or projected air quality violation. Specifically, NOx emissions associated with construction of the proposed project would exceed regional significance thresholds published by the SCAQMD.	<b>MM-AQ-1:</b> 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.	Less than significant impact
<b>AIR-3.</b> The proposed project could expose sensitive receptors to substantial pollutant concentrations. Specifically, on-site construction-related emissions would exceed the SCAQMD’s Localized Significance Threshold (LST) for NOx, PM10, and PM2.5	<b>MM- AQ -1:</b> 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. <b>MM-AQ-2:</b> 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.	Less than significant impact
<b>Cumulative Impacts:</b> Regional construction emissions were determined to be cumulatively considerable (significant)	<b>MM-AQ-1:</b> 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.	Less than significant impact
<b>Cultural Resources</b>		
<b>Impact CR-1:</b> The proposed project would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. Specifically, demolition all the buildings in the North Parcel, that are associated with the “Marketing and Servicing the Automobile,” except the former new car showrooms (would remain in-place) and Welcome sign (would be relocated within site), would present an adverse effect relative to loss of integrity, feeling, and association.	<b>MM-CR-1:</b> 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: Design and Historic Preservation Section 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. <b>MM-CR -2:</b> Interpretive Display Presenting Site History. The applicant will be responsible to have a “history of the automobile in Pasadena” interpretive display 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 prior to demolition activities on the project site. <b>MM-CR -3:</b> 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.	Less than significant impact
<b>Impact CR-1 (continued):</b> In addition to the impacted described above, groundborne vibration associated with construction activities at the project site pose the potential for structural damage to nearby historic structures including the F. Suie One Antiques Store and the Holliston Avenue Methodist Church. Mitigation is proposed.	<b>MM-CR -4:</b> 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). <b>MM-CR-5:</b> 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	Less than significant impact

**Table S-1 Summary of Project Impacts, Mitigation Measures, and Residual Impacts**

Significant Threshold and Project Impacts	Mitigation Measures	Residual Impacts
	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.	
<b>Impact CR-2:</b> The proposed project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.	No mitigation is required	Less than significant impact
<b>Impact CR-3:</b> The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Specifically, excavation associated with construction of the subsurface parking structure could encounter paleontological resources.	<b>MM-CR-6:</b> 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.	Less than significant impact
<b>Cumulative Impacts:</b> As discussed above under Impact CR-1 and CR-3, the project could result in significant impacts to historic resources and to paleontological resources, respectively, which would represent cumulatively considerable contributions to significant cumulative impacts on those resources.	Implementation of MM-CR-1 through MM-CR-5, presented above, along with the City’s practice and requirements to complete historic resources impacts evaluations and mitigation recommendation, where appropriate, on individual projects would address cumulative historic resources impacts. Implementation of MM-CR-6 would address cumulative impacts to paleontological resources.	Less than significant impact
<b>Greenhouse Gases</b>		
<b>GHG-1.</b> The proposed project would not result in a reduction in GHG emissions that is less than 15 percent below the BAU conditions (i.e., the project’s GHG emissions would be more than 15 percent below BAU conditions).	No mitigation is required	Less than significant impact
<b>GHG-2.</b> The proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.	No mitigation is required	No impact
<b>Cumulative Impacts:</b> 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. As indicated above, the project’s impacts were determined to be less than significant and are therefore not cumulatively considerable.	No mitigation is required	Less than significant impact
<b>Hazards and Hazardous Materials</b>		
<b>HAZ-1.</b> The proposed project could 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. Specifically, subsurface excavation could encounter contaminated soils and demolition of existing structures could encounter hazardous building materials such as those containing asbestos, lead-based paint, or PCBs.	<b>MM-HAZ-1:</b> 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. <b>MM-HAZ-2:</b> 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. <b>MM-HAZ-3:</b> 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.	Less than significant impact
<b>HAZ-2.</b> The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school.	No mitigation is required	No impact
<b>Cumulative Impacts:</b> Should soil contamination or ACM, LBP, and PCBs be encountered during project construction, there is the potential for significant impacts associated with	Implementation of mitigation measures MM-HAZ-1 through MM-HAZ-3, above, would address potential cumulative impacts.	Less than significant

**Table S-1 Summary of Project Impacts, Mitigation Measures, and Residual Impacts**

Significant Threshold and Project Impacts	Mitigation Measures	Residual Impacts
exposure of the public, including construction workers, to upset conditions associated with hazardous materials. Such a condition could contribute to a significant cumulative impact.		
<b>Hydrology and Water Quality</b>		
<b>HYDRO-1.</b> The proposed project would not violate any water quality standards or waste discharge requirements.	No mitigation is required	Less than significant impact
<b>HYDRO-2.</b> The proposed project would not 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.	No mitigation is required	Less than significant impact
<b>HYDRO-3.</b> The proposed project would not 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.	No mitigation is required	Less than significant impact
<b>HYDRO-4.</b> The proposed project would not 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.	No mitigation is required	Less than significant impact
<b>HYDRO-5.</b> The proposed project would not otherwise substantially degrade water quality.	No mitigation is required	Less than significant impact
<b>Cumulative Impacts:</b> No significant cumulative impacts related to hydrology and water quality would occur.	No mitigation is required	Less than significant impact
<b>Land Use and Planning</b>		
<b>LAND-1.</b> The proposed project would not 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.	No mitigation is required	Less than significant impact
<b>Cumulative Impacts:</b> No significant cumulative impacts related to land use and planning would occur.	No mitigation is required	Less than significant impact
<b>Noise and Vibration</b>		
<b>NOISE-1.</b> The proposed project would not cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	No mitigation is required.	Less than significant impact
<b>NOISE-2.</b> The proposed project could result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. Specifically, noise associated with on-site stationary sources and on-site outdoor activities could result in significant noise impacts.	<p><b>MM-NOISE-1:</b> 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.</p> <p><b>MM- NOISE-2:</b> 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.</p> <p><b>MM- NOISE-3:</b> 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.</p> <p><b>MM- NOISE-4:</b> 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:</p> <ol style="list-style-type: none"> <li>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.</li> </ol>	Less than significant impact
<b>NOISE-3.</b> The proposed project could 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. Specifically, indoor noise levels suitable for hotel uses could be exceeded.	<b>MM-NOISE-5:</b> 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).	Less than significant impact

**Table S-1 Summary of Project Impacts, Mitigation Measures, and Residual Impacts**

Significant Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<p><b>NOISE-4:</b> The proposed project could expose persons to or generate excessive groundborne vibration or groundborne noise levels. Specifically, construction of the proposed project has the potential to generate vibration to the adjacent structures and their occupants.</p>	<p><b>MM- NOISE-6:</b> 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:</p> <ul style="list-style-type: none"> <li>• Review the project plans for demolition and construction.</li> <li>• 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.</li> <li>• Prepare and submit a report to the Director of Planning and Community Development that includes but is not limited to the following:</li> <li>• Any description/survey information obtained under the second bullet point.</li> <li>• 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.</li> <li>• Specific measures to be taken during construction to ensure the specified vibration level limits are not exceeded.</li> <li>• 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.</li> </ul> <p>Examples of measures that may be specified for implementation during demolition or construction include, but are not limited to the following:</p> <ul style="list-style-type: none"> <li>• Prohibition of certain types of construction equipment.</li> <li>• The requirement for lighter-tracked or wheeled equipment.</li> <li>• Specifying demolition by non-impact methods, such as sawing concrete.</li> <li>• Organization of phasing so as to avoid simultaneous vibration sources.</li> <li>• Installation of vibration-measuring devices to guide decision making for subsequent activities.</li> </ul> <p><b>MM- NOISE-7:</b> 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 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) and other applicable codes.</p> <p><b>MM- NOISE-8:</b> 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.</p> <p><b>MM- NOISE-9:</b> 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.</p> <p>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).</p> <p><b>MM- NOISE-10:</b> 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:</p> <p>Vibratory rollers or similar vibratory compaction equipment shall not be used within 25 feet of the <del>Grace Lutheran Church Complex</del> <u>church complex buildings</u> 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 <del>Grace Lutheran Church Complex</del> <u>church complex buildings</u> 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.</p>	<p>Less than significant impact</p>
<p><b>Cumulative Impacts:</b> As discussed above, Impacts NOISE-2, NOISE-3, and NOISE-4 would be significant without mitigation and, therefore, could be a cumulatively considerable contribution to significant cumulative noise impacts.</p>	<p>Implementation of MM-NOISE -1 through MM-NOISE-10, presented above, would address cumulative impacts.</p>	

**Table S-1 Summary of Project Impacts, Mitigation Measures, and Residual Impacts**

Significant Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<b>Public Services (Fire Only)</b>		
<b>FIRE-1:</b> The proposed project would not 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.	No mitigation is required	Less than significant impact
<b>Cumulative Impacts:</b> No significant cumulative impacts related to public services (Fire) would occur.	No mitigation is required	Less than significant impact
<b>Transportation and Traffic</b>		
<b>TRAFFIC-1:</b> The proposed project could conflict with an applicable plan, ordinance or policy establishing measures of performance for the transportation system. Specifically, implementation of the project would decrease the percentage of the Citywide service population located within one-quarter mile of existing bicycle facilities.	<b>MM-T-1: Proximity and Quality of Bicycle Network</b> 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))x(Total Cost of the USCTCS)	Less than significant impact
<b>TRAFFIC-2:</b> The proposed project would not 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.	No mitigation is required	Less than significant impact
<b>TRAFFIC-3:</b> The proposed project would not increase hazards due to a design feature (e.g., sharp curves or dangerous intersection) or incompatible uses (e.g., farm equipment).	No mitigation is required	Less than significant impact
<b>TRAFFIC-4:</b> The proposed project could conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Specifically, implementation of the project would decrease the percentage of the Citywide service population located within one-quarter mile of existing bicycle facilities.	See Mitigation Measure MM-T-1 above	Less than significant impact
<b>Cumulative Impacts:</b> No significant cumulative impacts related to transportation and traffic would occur.	No mitigation is required	Less than significant impact
<b>Utilities and Services</b>		
<b>UTILITIES-1:</b> The proposed project would not 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.	No mitigation is required	Less than significant impact
<b>UTILITIES-2:</b> The proposed project would not 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.	No mitigation is required	Less than significant impact
<b>UTILITIES-3:</b> The proposed project would have sufficient water supplies available to serve the project from existing entitlements and resources; no new or expanded entitlements are needed.	No mitigation is required	Less than significant impact
<b>UTILITIES-4:</b> The proposed project would 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.	No mitigation is required	Less than significant impact
<b>UTILITIES-5:</b> The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs.	No mitigation is required	Less than significant impact
<b>Cumulative Impacts:</b> No significant cumulative impacts related to utilities and services would occur.	No mitigation is required	Less than significant impact

**Table S-2 Comparison of Alternatives to the Proposed Project**

Type of Impact	Level of Impact: SU=Significant and Unavoidable   M= Less than Significant with Mitigation Incorporated   L=Less than Significant   N=No Impact				
	Project	Alternative 1 No Project	Alternative 2 Reduced Project	Alternative 3 Hotel on North Efficiency Units/Apartments on South	Alternative 4 Mixed-Use Residential and Commercial
<b>Air Quality</b>	M	M – Fewer than Proposed Project	M – Fewer than Proposed Project	M – Similar to Proposed Project	M – Greater than Proposed Project
AQMP Consistency	N	Similar	Similar	Similar	Similar
Violate Air Quality Standard	M	Greater (direct impacts) / Fewer (indirect impacts)	Greater (direct impacts) / Fewer (indirect impacts)	Greater (direct impacts) / Fewer (indirect impacts)	Greater
LST Emissions	M	Fewer	Fewer	Similar	Similar
Cumulative Impacts	M	Greater (direct impacts) / Fewer (indirect impacts)	Greater (direct impacts) / Fewer (indirect impacts)	Greater (direct impacts) / Fewer (indirect impacts)	Greater
<b>Cultural Resources</b>	M	M – Fewer than Proposed Project	M – Similar to Proposed Project	If Showrooms are Retained: M – Similar to Proposed Project / If Showrooms are Removed: SU – Greater than Proposed Project	M – Similar to Proposed Project
Historic Resources – Loss of Resources	M	Fewer	Similar	Greater (if showrooms <del>retained</del> removed) / Similar (if showrooms <del>removed</del> retained)	Similar
Historic Resources – Vibration Impacts	M	Fewer	Similar	Similar	Similar
Archaeological Resources	L	Fewer	Similar	Similar	Similar
Paleontological Resources.	M	Fewer	Similar	Similar	Similar
<b>Greenhouse Gases</b>	L	L – Fewer than Proposed Project	L – Fewer than Proposed Project	L – Similar to Proposed Project	L – Greater than Proposed Project
GHG Emissions	L	Greater (direct impacts) / Fewer (indirect impacts)	Greater (direct impacts) / Fewer (indirect impacts)	Greater (direct impacts) / Fewer (indirect impacts)	Greater
Conflict with Applicable Plan	N	Similar	Similar	Similar	Similar
<b>Hazards and Hazardous Materials</b>	M	M – Fewer than Proposed Project	M – Similar to Proposed Project	M – Similar to Proposed Project	M – Similar to Proposed Project
Transport, Use, Disposal	M	Fewer	Similar	Similar	Similar
Hazardous Materials Release	N	Similar	Similar	Similar	Similar
<b>Hydrology and Water Quality</b>	L	L – Potentially worse than Proposed Project	L – Similar to Proposed Project	L – Similar to Proposed Project	L – Similar to Proposed Project
Violate Water Quality Standards	L	Similar / Possibly Greater (long-term)	Similar	Similar	Similar
Substantial Erosion/Siltation	L	Similar	Similar	Similar	Similar
Flooding	L	Similar	Similar	Similar	Similar
Exceed drainage capacity, result in polluted runoff	L	Similar	Similar	Similar	Similar
Substantially degrade water quality.	L	Similar / Possibly Greater (long-term)	Similar	Similar	Similar
<b>Land Use and Planning</b>	L	L – Similar to Proposed Project	L – Fewer than Proposed Project	L – Similar to Proposed Project	L – Similar to Proposed Project
Conflict with Applicable Plan	L	Similar	Fewer	Similar	Similar
<b>Noise and Vibration</b>	M	M – Fewer than Proposed Project	M – Similar to Proposed Project	M – Similar to Proposed Project	M – Similar to Proposed Project
Substantial Temporary Increase in Ambient Noise	L	Fewer	Similar	Similar	Similar
Substantial Permanent Increase in Ambient Noise	M	Fewer	Similar	Similar	Similar
Exceed General Plan/Noise Ordinance Standards	M	Fewer	Similar	Similar	Similar
Excessive Groundborne Vibration/Noise	M	Fewer	Similar	Similar	Similar
<b>Public Services</b>	L	L – Similar to Proposed Project	L – Similar to Proposed Project	L – Similar to Proposed Project	L – Similar to Proposed Project
Fire Protection	L	Similar	Similar	Similar	Similar
<b>Transportation and Traffic</b>	M	SU – Greater than Proposed Project	M – Similar to Proposed Project	M – Similar to Proposed Project	M – Similar to Proposed Project
Conflict with Performance Standards	M	Greater (VMT/VT) / Fewer (Bicycle)	Greater (VMT/VT) / Fewer (Bicycle)	Greater (VMT/VT) / Fewer (Bicycle)	Greater (VMT/VT) / Fewer (Bicycle)
Conflict with CMP	L	Similar	Similar	Similar	Similar
Design Features/Incompatible Use	L	Similar	Similar	Similar	Similar
Public Transit. Bicycle, Pedestrian Facilities	M	Greater	Greater	Greater	Greater
<b>Utilities and Services</b>	L	L – Fewer than Proposed Project	L – Fewer than Proposed Project	L – Similar to Proposed Project	L – Similar to Proposed Project
New/Expanded Water or Wastewater Facilities	L	Similar	Similar	Similar	Similar
New/Expanded Storm Drains	L	Similar	Similar	Similar	Similar
Sufficient Water Supplies	L	Fewer	Fewer	Similar	Similar
Wastewater Treatment Capacity	L	Fewer	Fewer	Similar	Similar
Landfill Capacity	L	Fewer	Fewer	Similar	Similar

## Section 2

# Clarifications, Revisions, and Corrections

The following clarifications, revisions, and corrections are set forth to update the Draft Environmental Impact Report (EIR) for the proposed Hill and Colorado Project (proposed project) in response to the comments received during the public review period for the document.

Changes to the Draft EIR are identified below by the corresponding Draft EIR section and subsection, if applicable, and the page number. Additions and deletions reflected in the Final EIR published in April 2016 are shown in underline and ~~deletions in strikethrough~~ format, respectively. Additions and deletions subsequently made in the updated Final EIR (August 2016) are shown in double-underline and double-strikethrough, respectively.

### Executive Summary

The following update is made to reflect the fact that subsequent to publication of the Draft EIR, the Pasadena City Council passed a resolution that changed the General Plan land use designation for a portion of the project site, thereby making the entirety of the site Medium Mixed Use.

*Draft EIR-Page ES-1, Second Paragraph, starting with Eighth Sentence (including related footnote):*

The General Plan land use designation applicable to the project site is Medium Mixed Use.<sup>1</sup> ~~At the time the EIR Notice of Preparation was released, the General Plan Land Use designations for the project site were “Specific Plan” and “Medium-High Density Residential.” On August 18, 2015, the City Council approved an update to the General Plan, whereby the General Plan land use designations for the project site changed to Medium Mixed Use. Following the adoption of the updated General Plan, staff discovered a mapping error had occurred. A portion of the north parcel was shown as having a land use designation of High Density Residential, instead of Medium Mixed Use. The property with the land use designation of High Density Residential was intended to be amended to have the same land use designation of Medium Mixed Use. The Planning & Community Development Department is currently preparing a clean-up item, to be considered by the City Council, which would address this and other minor mapping and textual changes in the General Plan. Following consideration by the City Council, the land use diagram would reflect the intended land use designation. The properties comprising the north and south parcel would have a land use designation of Medium Mixed Use.~~

1. As further described in Section 3.7, Land Use and Planning, the General Plan Land Use designations at the time the EIR Notice of Preparation was released were “Specific Plan” and “Medium-High Density Residential.” ~~In conjunction with the subsequent General Plan update, the land use designation for the project site was changed to Medium Mixed Use, although an inadvertent mapping error at the time indicated a portion of the site to be High Density Residential. The Planning & Community Development Department is currently preparing a clean-up item, to be considered by the City Council, which would address this and other minor mapping and textual changes in the General Plan.~~ On August 18, 2015, the City Council

approved an update to the General Plan, whereby the General Plan land use designations for most of the project site changed to Medium Mixed Use. On January 25, 2016, the Pasadena City Council adopted Resolution No. 9480, a clean-up item, to designate the remainder of the project site Medium Mixed Use. As such, the properties comprising the north and south parcel now have a land use designation of Medium Mixed-Use.

The second sentence at the top of page ES-2 of the Draft EIR is modified to more accurately reflect the land uses located directly north of the North Parcel as follows:

More specifically, the northern edge of the North Parcel is bordered by ~~multi-family residences, the Chapel of the Roses Church, and a private school~~ the Prism Church (Chapel of the Roses) and the Grace Lutheran Church Complex.

The following corrections are made to Mitigation Measures MM-CR-1 and MM-CR-2 on page ES-7 of the Draft EIR to reflect the correct name of the City department to be involved in implementation of those measures:

**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: Design and Historic ~~Resources~~ Preservation Section 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.

**MM-CR -2:** Interpretive Display Presenting Site History. The applicant will be responsible to have a “history of the automobile in Pasadena” interpretive display 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 Resources Preservation Section prior to demolition activities on the project site.

The following correction is made to Mitigation Measure MM-CR-4 on page ES-7 of the Draft EIR to reflect the correct cross-reference to a related mitigation measure:

**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-109 regarding mitigation of construction-related vibration damage to historic structures).

As a correction as the bottom of page ES-9 of the Draft EIR, COA-NOISE-7 is hereby removed (Note: The subject requirement is still applicable to the project, but is not a mitigation measure; Table ES-1 delineates only the mitigation measures applicable to the project):

~~**COA-NOISE-7:** Guest Room Ventilation. Each hotel room will include a mechanical ventilation system, as required by the California Building Code, for occupancy with windows closed.~~

In response to Comment 9-6 on the Draft EIR, Mitigation Measure MM-NOISE-9, presented on page ES-10 of the Draft EIR, is revised as follows:

**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).

The following modification to Mitigation Measure MM-NOISE-10 presented on page ES-10 of the Draft EIR is made to more accurately reflect the land uses located directly north of the North Parcel:

**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 ~~multi-family building~~ Grace Lutheran Church Complex 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 ~~multi-family~~ adjacent Grace Lutheran Church Complex 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 ~~multi-family~~ 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.

In response to concerns expressed during the Draft EIR public comment period, Mitigation Measure MM-T-1 on page ES-11 of the Draft EIR has been revised as follows:

**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:

$$\frac{\text{Proposed Project's Service Population}}{\text{Service Population within a } \frac{1}{4} \text{ mile of the USCTCS}} \times (\text{Total Cost of the USCTCS})$$

~~for the proposed protected bike lane (cycle track) on Union Street between Arroyo Parkway and Holliston Avenue, its connection to the existing bike lanes on Cordova Street via Holliston Avenue.~~

~~The installation of a traffic signal at the intersection of Holliston Avenue/Union Street is being proposed as a project mitigation measure for this unsignalized intersection because a fully-signalized intersection will increase safety for cyclists using the approved Union Street cycle track which runs from Hill Street to Arroyo Parkway and for cyclists using the Holliston Avenue bicycle boulevard project which runs from Union Street to Cordova Street.~~

~~The installation of a traffic signal at the intersection of Holliston Avenue/Colorado Boulevard is being proposed as a project mitigation measure for this unsignalized intersection because a fully signalized intersection will increase safety for cyclists using the approved Union Street cycle track which runs from Hill Street to Arroyo Parkway and for cyclists using the Holliston Avenue Bicycle Boulevard project which runs from Union Street to Cordova Street.~~

~~The applicant or successor agency shall contribute funds to install signage and pavement markings for the planned greenway along Holliston Avenue between Union Street and Colorado Boulevard to increase safety for cyclists.~~

Within Table ES-2 on page ES-12 of the Draft EIR, the first line under Cultural Resources (i.e., “Historic Resources – Loss of Resources”) is corrected relative to Alternative 3, as follows:

Greater (if showrooms ~~retained~~ removed) / Similar (if showrooms ~~removed~~ retained)

## Section 2 Project Description

Draft EIR-Page 2-9, Figure 2-3, Project Area Overview:

The subject figure has been revised to correct the boundary of the North Parcel. The revised figure is presented herein on the next page.

### 2.5 Land Use and Planning

The second sentence at the top of page 2-8 of the Draft EIR is modified to more accurately reflect the land uses located directly north of the North Parcel as follows:

More specifically, the northern edge of the North Parcel is bordered by ~~multi-family residences, the Chapel of the Roses Church, and a private school~~ the Prism Church and the Grace Lutheran Church Complex.

Similar to the previously described change made to the Executive Summary, the following change was made to the Project Description:

Draft EIR-Page 2-8, starting with Fourth Sentence:

At the time the EIR Notice of Preparation was released, the General Plan Land Use designations for the project site were “Specific Plan” and “Medium-High Density Residential.” On August 18, 2015, the City Council approved an update to the General Plan, whereby the General Plan land use designations for most of the project site changed to Medium Mixed Use. On January 25, 2016, the Pasadena City Council adopted Resolution No. 9480, a clean-up item, to designate the remainder of the project site Medium Mixed Use. As such, the properties comprising the north and south parcel now have a land use designation of Medium Mixed Use. Following the adoption of the updated General Plan, staff discovered a mapping error had occurred. A portion of the north parcel was shown as having a land use designation of High Density Residential, instead of Medium Mixed Use. The property with the land use designation of High Density Residential was intended to be amended to have the same land use designation of Medium Mixed Use. The Planning & Community Development Department is currently preparing a clean-up item, to be considered by the City Council, which would address this and other minor mapping and textual changes in the General Plan. Following consideration by the City Council, the land use diagram would reflect the intended land use



Aerial Imagery Source: Bing Maps, 2013



Figure 2-3  
Project Area Overview  
Hill and Colorado Project



~~designation. The properties comprising the north and south parcel would have a land use designation of Medium Mixed Use.~~

### 2.7.1.1 Proposed Development

Table 2-2 on page 2-17 of the Draft EIR is hereby corrected as follows:

**Table 2-2 Summary of Proposed Uses by Floor Level**

Level	Conceptual Use
<b>North Parcel</b>	
<del>Building B</del>	<del>Demolish</del>
<del>Building C</del>	<del>Partially demolish—2,940 square foot auto showroom would be retained</del>
<del>Building D</del>	<del>Demolish</del>
<del>Building E</del>	<del>Demolish</del>
<del>Subsurface Levels 1-2</del>	<del>Parking</del>
<u>Ground Floor</u>	<u>Retail, Restaurant/Bar, Hotel Lobby, Ballrooms, Kitchen, Spa, Administration Offices</u>
<u>Second Floor</u>	<u>Conference Rooms, Hotel Rooms, Pool, Fitness Center, Administration Offices</u>
<u>Third through Sixth Floors</u>	<u>Hotel Rooms</u>
<u>Seventh Floor</u>	<u>Hotel Rooms, Executive Lounge, Pool</u>
<b>South Parcel</b>	
<u>Subsurface Levels 1-2</u>	<u>Parking</u>
<u>Ground Floor</u>	<u>Retail, Hotel Lobby</u>
<u>Second through Fourth Floors</u>	<u>Hotel Rooms</u>

## Section 3.3 and Appendix C Cultural Resources

The first full paragraph on page 3.3-26 of the Draft EIR is hereby revised as follows:

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~~ relocation of the “Welcome” sign.

The following corrections are made to Mitigation Measures MM-CR-1 and MM-CR-2 on page 3.3-32 of the Draft EIR to reflect the correct name of the City department to be involved in implementation of those measures:

### **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: Design and Historic ~~Resources~~ Preservation Section 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.

**MM-CR -2: Interpretive Display Presenting Site History.**

The applicant will be responsible to have a “history of the automobile in Pasadena” interpretive display 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 Resources Preservation Section prior to demolition activities on the project site.

The following correction is made to Mitigation Measure MM-CR-4 on page 3.3-33 of the Draft EIR to reflect the correct cross-reference to a related mitigation measure:

**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-~~10~~9 regarding mitigation of construction-related vibration damage to historic structures).

Appendix C: Cultural Resources Phase I – Exhibit 2, Project Site

The subject figure has been revised to correct the boundary of the North Parcel. The revised figure is presented herein on the next page.

**Section 3.7****Land Use and Planning**

Similar to the change made to the Executive Summary described above, the following change was made to the Land Use and Planning section:

*Draft EIR-Page 3.7-10, starting with First Sentence*

At the time the EIR Notice of Preparation was released, the General Plan Land Use designations for the project site were “Specific Plan” and “Medium-High Density Residential.” On August 18, 2015, the City Council approved an update to the General Plan, whereby the General Plan land use designations for most of the project site changed to Medium Mixed Use; however, at that time, a ~~Following the adoption of the updated General Plan, staff discovered a mapping error had occurred.~~ A portion of the north parcel was shown as having a land use designation of High Density Residential, instead of Medium Mixed Use (see **Figure 3.7-3, Existing General Plan Land Use Diagram**, which reflects the ~~recent~~ General Plan update at the time). Subsequently, on January 25, 2016, the Pasadena City Council adopted Resolution No. 9480 to designate the remainder of the project site Medium Mixed Use. The property with the land use designation of High Density Residential was intended to be amended to have the same land use designation of Medium Mixed Use. The Planning & Community Development Department is currently preparing a clean-up item, to be considered by the City Council, which would address this and other minor mapping and textual changes in the General Plan. Following consideration by the City Council, the land use diagram would reflect the intended land use designation. As such, tThe properties comprising the north and south parcel ~~would~~ now have a land use designation of Medium Mixed-Use.

Related to the above, tthe following clarification is made to the description of zoning actions associated with the proposed adoption of the PD District, as presented in the first bullet at the bottom of page 3.7-25 of the Draft EIR:

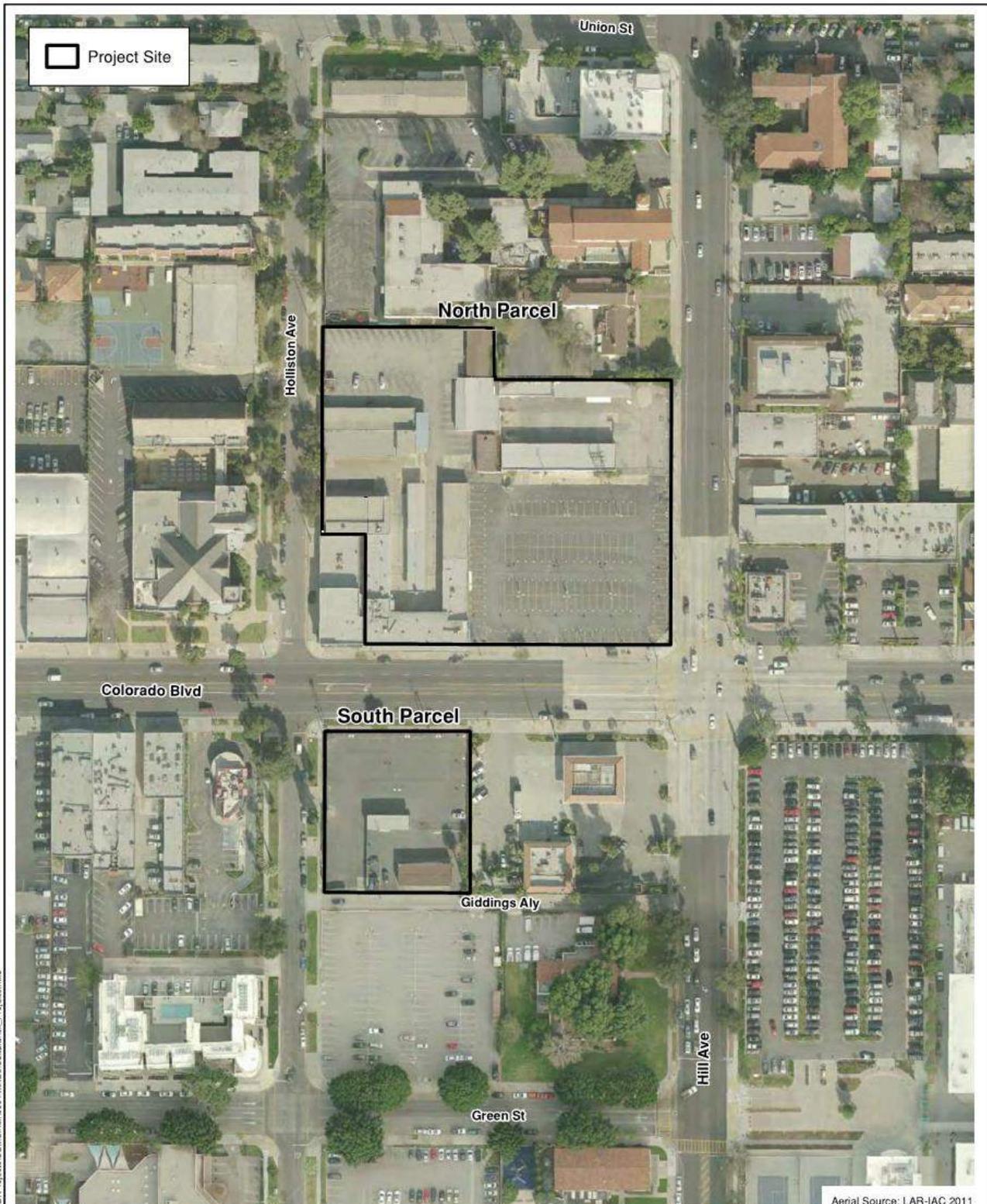
- Change in zoning designation for both parcels from ECSP-CG-2 to PD and, for the northwest portion of the North Parcel, change in zoning designation from RM-48 PK to PD;

Draft EIR-Page 3.7-18, Figure 3.7-6, Existing Zoning Designations:

The subject figure has been revised to correct the boundary of the North Parcel. The revised figure is presented herein on the next page.

**Section 3.8 and Appendix F****Noise and Vibration**

The following corrections are made to reflect that church/school uses are located immediately north of the North Parcel, and not residential uses as indicated in the Draft EIR. These corrections apply to both Section 3.8 of the Draft EIR and Appendix F of the Draft EIR, with specific citations to each indicated below.

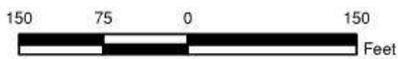


D:\Projects\CDMS\Smith\0004\MKD\Culture\ex2\_ProjSite.mxd

Aerial Source: LAR-IAC 2011

## Project Site

*Hill and Colorado Project*



## Exhibit 2



(Rev: 7-17-2014 JAZ) X:\Projects\CDMS\Smith\0004\Graphics\Culture\ex2\_ProjSite.pdf



Source: City of Pasadena, 2015



Figure 3.7-6  
Existing Zoning Designations  
Hill and Colorado Project

It should be noted that this correction does not change any of the conclusions of the noise and vibration impact analysis of the Draft EIR because residential uses and church/school uses are both considered to be sensitive receptors.

*Draft EIR*-Page 3.8-5, Third Paragraph, First Sentence:

The North Parcel is bordered by the Prism Church and church/school facilities within the Grace Lutheran Church Complex multi-family residences, the Prism Church (previously the Chapel of the Roses Church), and a private school (not currently in operation) to the north.

*Draft EIR*-Page 3.8-9, First Bullet, First and Second Sentences, and *Appendix F*-Page 11, First Bullet:

- ~~Multi-family residences on Holliston Avenue~~ Church/school facilities adjacent to the North Parcel's northern boundary. There is an approximate seven-foot-high masonry wall separating the ~~residential~~ church/school facility building from the project site.

*Draft EIR*-Page 3.8-10, First Bullet, and *Appendix F*-Page 14, Third Bullet:

- ~~Multi-family residences on Holliston Avenue~~ Church/school facility adjacent to the North Parcel's northern boundary.

*Draft EIR*-Page 3.8-30, Second Full Paragraph, Fourth Sentence:

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/school facility located to the north, thereby reducing noise level impacts at the subject ~~residential and church~~ areas.

*Draft EIR*-Page 3.8-39, Mitigation Measure MM-NOISE-10:

**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 ~~multi-family building Grace Lutheran Church Complex 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 ~~multi-family adjacent Grace Lutheran Church Complex 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 ~~multi-family~~ 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*-Page 3.8-7, Figure 3.8-1, Aerial Overview and Noise Monitoring Locations, and *Appendix F*-Exhibit 3, and Exhibit 6, Noise Monitoring Locations:

The subject figure has been corrected to remove the label “Multi-Family Residences” from the lots located immediately north of the North Parcel and add “Prism Church (Church of the Roses) and Grace Lutheran Church.” Also, the boundary of the North Parcel has been corrected. The revised figure is presented herein on the next page.

*Appendix F*-Page 11, Second Paragraph, Third Sentence:

The North Parcel is bordered to the north by ~~multi-family residences~~ and the Prism Church and the Hill Avenue Grace Lutheran Church Complex.

*Appendix F*-Page 19, Last Paragraph, First Sentence:

The closest noise-sensitive receptors to the North Parcel are the ~~residences adjacent to the project site in the building on the northeast corner of Holliston Avenue and Colorado Boulevard; the residences church/school facility within the Prism Church and the Hill Avenue Grace Lutheran Church complex~~ to the north, which ~~are~~ is within 10 feet from the Parcel’s northern property line; ~~and the Prism Church, the main building of the Hill Avenue Grace Lutheran Church on Hill Avenue, approximately 25 feet north of the North Parcel; and the residences on Holliston Avenue that are approximately 50 feet west of the North Parcel.~~

*Appendix F*-Page 20, First Full Paragraph, Third Sentence:

Maximum noise levels (which would occur occasionally and intermittently when equipment would work closest to the sensitive receptors at the property line at full power) are estimated at up to 100 dBA at the east façade of the second floor residences on the east side of the two-story building on the northeast corner of Colorado Boulevard, 95 dBA at the ~~residences church/school building~~ adjacent to the North Parcel on the north; 87 dBA at the residences west of the North Parcel; and 83 dBA at the residences southwest of the South Parcel.

*Appendix F*-Page 20, Table 6, and Page 21, Table 7, Third Row, First Column:

~~Multi-family residences~~ Church/school building north of the North Parcel

The numbering of the condition of approval on page 3.8-35 of the Draft EIR is corrected as follows:

**COA-NOISE-76**

In response to Comment 9-6 on the Draft EIR, Mitigation Measure MM-NOISE-9, presented on page 3.8-39, is revised as follows:

**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



Source: BonTerra Psomas, 2014



Figure 3.8-1  
Aerial Overview and Noise Monitoring Locations  
*Hill and Colorado Project*



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).

## Section 3.10

### Transportation and Traffic

The description of parking restrictions on Holliston Avenue is clarified as follows:

*Draft EIR-Page 3.10-6, Fifth Paragraph, Fifth Sentence*

Adjacent to the North Parcel, “No Pparking Any Time Except on Sundays” is allowed posted on the east side of the street adjacent to the North Parcel and “1 Hour Parking 9 AM to 6 PM” is posted on the west side of the street. Adjacent to the South Parcel, “No Parking Any Time” is posted on the west side of the street adjacent to the South Parcel and “2 Hour Parking 9 AM to 6 PM” is posted on the east side of the street.

Reference to additional information regarding the City’s traffic demand forecasting model is modified as follows:

*Draft EIR-Page 3.10-22, Second Paragraph, Fifth Sentence*

For the more information regarding the input and output files from the TDF, or the TDF model development reports, please contact the City of Pasadena Department of Transportation or visit City’s Genera Plan at website link, see Section 3.10.6 below and the Traffic Study in Appendix G of the EIR.

In response to concerns expressed during the Draft EIR public comment period, Mitigation Measure MM-T-1 on pages 3.10-26 and 3.10-27 of the Draft EIR has been revised as follows:

#### **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, tThe 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:

$$\frac{\text{Proposed Project's Service Population}}{\text{Service Population within a } \frac{1}{4} \text{ mile of the USCTCS}} \times (\text{Total Cost of the USCTCS})$$

for the proposed protected bike lane (cycle track) on Union Street between Arroyo Parkway and Holliston Avenue, its connection to the existing bike lanes on Cordova Street via Holliston Avenue.

~~–The installation of a traffic signal at the intersection of Holliston Avenue/Union Street is being proposed as a project mitigation measure for this unsignalized intersection because a fully signalized intersection will increase safety for cyclists using the approved Union Street cycle track which runs from Hill Street to Arroyo Parkway and for cyclists using the Holliston Avenue bicycle boulevard project which runs from Union Street to Cordova Street.~~

~~–The installation of a traffic signal at the intersection of Holliston Avenue/Colorado Boulevard is being proposed as a project mitigation measure for this unsignalized intersection because a fully signalized intersection will increase safety for cyclists using the approved Union Street cycle track which runs from Hill Street to Arroyo Parkway and for cyclists using the Holliston Avenue Bicycle Boulevard project which runs from Union Street to Cordova Street.~~

~~–The applicant or successor agency shall contribute funds to install signage and pavement markings for the planned greenway along Holliston Avenue between Union Street and Colorado Boulevard to increase safety for cyclists.~~

In response to concerns expressed during the Draft EIR public comment period, the following discussion and conditions of approval are hereby added at the end of the Residual Impacts section on page 3.10-30 of the Draft EIR:

While no significant impacts pertaining to construction-related or operations-related truck deliveries would occur with implementation of the proposed project, the City is recommending the following conditions of approval, which can be included within other conditions of approval identified as part of the City's entitlement process.

**COA-T-1: Construction Truck Delivery Hours**

Construction-related traffic (delivery trucks or haul trucks) shall be restricted to the hours between 9:00 AM to 3:00 PM to limit peak hour traffic conflicts along the local street network.

**COA-T-2: Coordination with Public Transit Agencies During Construction**

At least 30 days prior to start of construction, the project applicant/developer shall contact public transit agencies with facilities and/or service occurring adjacent to the project site to review, discuss, and coordinate construction plans and activities having the potential to affect those facilities/services, with the objective to avoid or minimize temporary construction-related impacts to such facilities/services. In the unlikely event that construction activities may affect bus operations, the applicant shall contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 as well as the City of Pasadena Transit Division at 626-744-7661 in advance of initiating construction activities.

**COA-T-3: Operations-Related Delivery Truck Access**

Due to the average daily volume of cars along Hill Avenue, delivery trucks shall access the site by traveling southbound along Hill Avenue to enter from the Hill Avenue project driveway, and exit from the Holliston Avenue project driveway. All loading spaces shall be designed and maintained so that the maneuvering, loading, or

unloading of vehicles does not interfere with the orderly movement of traffic and pedestrians on any street.

### **Section 4 Alternatives**

Within Table 4-1 on page 4-5 of the Draft EIR, the first line under Cultural Resources (i.e., “Historic Resources – Loss of Resources”) is corrected relative to Alternative 3, as follows:

Greater (if showrooms ~~retained~~ removed) / Similar (if showrooms ~~removed~~ retained)

### **Appendix H – Water Supply Assessment**

Page 1-3, Figure 1-1 Local Vicinity Map Hill and Colorado Project:

The subject figure has been revised to correct the boundary of the North Parcel. The revised figure is presented herein on the next page.



Aerial Imagery Source: Bing Maps, 2013

Figure 1-1 Local Vicinity Map Hill and Colorado Project

## Section 3

# Comments and Responses

According to the *California Environmental Quality Act (CEQA) Guidelines*, Section 15132, the Final EIR shall include comments and recommendations received on the Draft EIR either verbatim or in summary; a list of persons, organizations and public agencies commenting on the Draft EIR; and responses of the Lead Agency to significant environmental points raised in the comments..

### 3.1 List of Commenters

#### 3.1.1 List of Public Agencies and Private Parties Commenting on the Draft EIR

The following agencies, organizations and individuals provided written comments on the Draft EIR:

##### **Public Agencies**

- Letter No. 1 California Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit (December 2, 2015)
- Letter No. 2 California Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit (December 21, 2015)
- Letter No. 3 [e-mail] California Department of Transportation (Caltrans) (November 25, 2015)
- Letter No. 4 California Department of Transportation (Caltrans) (December 17, 2015)
- Letter No. 5 Los Angeles County Metropolitan Transportation Authority (Metro) (November 5, 2015)
- Letter No.6 County Sanitation Districts of Los Angeles County (November 30, 2015)

##### **Private and Local Organizations**

- Letter No. 7 Pasadena Heritage (November 30, 2015)
- Letter No. 8 Grace Lutheran Church (November 30, 2015)
- Letter No. 9 Holliston United Methodist Church (December 16, 2015)

##### **Individuals**

- Letter No. 10 Walter Choi (November 18, 2015)
- Letter No. 11 Richard McDonald (December 18, 2015)

## 3.2 Responses to Comments

### 3.2.1 Written Comments on the Draft EIR

The following provides individual responses to written comments received on the Draft EIR, with a copy of each comment letter bracketed to identify the individual comments for which the attendant written responses are then presented.



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

**Memorandum**

**Date:** December 2, 2015  
**To:** All Reviewing Agencies  
**From:** Scott Morgan, Director  
**Re:** SCH # 2013101060  
**Hill and Colorado Project**

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Pursuant to the attached letter, the Lead Agency has *extended* the review period for the above referenced project to **December 18, 2015** to accommodate the review process. All other project information remains the same.

1

cc: Tracy Steinkruger  
City of Pasadena  
175 N. Garfield Ave.  
Pasadena, CA 91101



# EXTENSION OF PUBLIC COMMENT PERIOD FOR DRAFT ENVIRONMENTAL IMPACT REPORT

**COLORADO HILL PLANNED DEVELOPMENT**  
**1336 East Colorado Boulevard; 1347-1355 East Colorado Boulevard**  
**and 39 North Hill Avenue**

**RECEIVED**  
**DEC - 1 2015**  
**STATE CLEARING HOUSE**

**Date:** November 30, 2015  
**To:** Agencies, Organizations, and Interested Parties  
**From:** City of Pasadena, Planning & Community Development Department, 175 N. Garfield Ave., Pasadena, CA 91101-1704  
**Subject:** Extension of Public Comment Period for the Colorado Hill Draft Environmental Impact Report

**NOTICE IS HEREBY GIVEN** that the City of Pasadena previously completed and published the Draft Environmental Impact Report (EIR) for the proposed Colorado Hill Planned Development project. The Draft EIR was prepared in compliance with the California Environmental Quality Act of 1970 (CEQA) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.). On October 13, 2015, the Draft EIR was made available for review during a 49-day public comment period that was originally set to close on November 30, 2015. The comment period is being extended and will now end on December 18, 2015.

**EXTENDED PUBLIC REVIEW PERIOD:** October 13, 2015 – December 18, 2015. Comments must be received by 5:30 p.m. on December 18, 2015.

**COMMENTS:** Comments on the Draft EIR may be received in writing during the public review period noted above. Written comments should be sent to Tracy Steinkruger at 175 N. Garfield Avenue, Pasadena, CA 91101 or [tsteinkruger@cityofpasadena.net](mailto:tsteinkruger@cityofpasadena.net).

**PROJECT DESCRIPTION:** The applicant, J&K Plus Investments, LLC has proposed to develop the North Parcel 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 building height along roadway frontages would be five stories (58 feet). In the interior of the site, portions of the proposed building would be up to seven stories (78 feet). A portion of the roof would have architectural features and rooftop bar and pool, resulting in an overall height of 90 feet. Two levels of subterranean parking would be provided to accommodate up to 700 vehicles. The proposed floor area ratio (FAR) is approximately 2.72.

The proposed project would develop the South Parcel with a smaller hotel and ground-floor commercial uses totaling 90,000 square feet. The hotel would include up to 150 guest rooms (approximately 80,000 square feet), have a maximum height of 48 feet, and provide two levels of subterranean parking for up to 150 vehicles. The ground floor would be occupied by retail,



## EXTENSION OF PUBLIC COMMENT PERIOD FOR DRAFT ENVIRONMENTAL IMPACT REPORT

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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 proposed FAR is approximately 2.98.

The proposed project involves the establishment of a Planned Development District encompassing the two subject sites. The proposed Planned Development District delineates development standards relative to building setbacks, heights, form, mass, scale, and other design considerations for future development at the site. Should the project be approved, the development would be subject to Design Review.

**DOCUMENT AVAILABILITY:** The Draft EIR can be viewed on the City of Pasadena website at: [http://cityofpasadena.net/Planning/Environmental Notices/](http://cityofpasadena.net/Planning/Environmental%20Notices/)

The Draft EIR and supporting documents are also available during regular business hours at the City of Pasadena, Planning & Community Development Department, 175 N. Garfield Avenue, Pasadena, CA 91101 (Window #3) between the hours of 8:00 a.m. through 5:00 p.m. Monday through Thursday, and between 8:00 a.m. and 12:00 p.m. on Friday. The Draft EIR is also available at the Pasadena Central Library, 285 E. Walnut Street, Pasadena, CA 91101 and at the Hill Avenue Branch Library, 55 S. Hill Avenue, Pasadena, CA 91106.

For additional information contact: Tracy Steinkruger, Senior Planner, (626) 744-6756, [tsteinkruger@cityofpasadena.net](mailto:tsteinkruger@cityofpasadena.net).

**Notice of Completion & Environmental Document Transmittal**

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 2013101060

Project Title: Hill and Colorado Project  
 Lead Agency: City of Pasadena, Planning & Community Development Dept Contact Person: Tracy Steinkruger-Senior Planner  
 Mailing Address: 175 N. Garfield Ave. Phone: (626) 744-6756  
 City: Pasadena Zip: 91101 County: Los Angeles

Project Location: County: Los Angeles City/Nearest Community: Pasadena  
 Cross Streets: Hill Ave/Colorado Blvd (Generally 1347-1355 & 1336 E Colorado Blvd and 39 N Hill Ave) Zip Code: 91106  
 Longitude/Latitude (degrees, minutes and seconds): 34 ° 8 ' 45.8 " N / -118 ° 7 ' 19.5 " W Total Acres: 3.64  
 Assessor's Parcel No.: Multiple Section: \_\_\_\_\_ Twp.: \_\_\_\_\_ Range: \_\_\_\_\_ Base: \_\_\_\_\_  
 Within 2 Miles: State Hwy #: I-210 & I-710 Waterways: None  
 Airports: None Railways: Metrol Gold Line Schools: Multiple

Document Type:

CEQA:  NOP  Draft EIR  Supplement/Subsequent EIR  Other:  Joint Document  
 Early Cons  Neg Dec  Mit Neg Dec  Other: \_\_\_\_\_  
 NEPA:  NOI  EA  Draft EIS  FONSI

Local Action Type:

General Plan Update  Specific Plan  Annexation  
 General Plan Amendment  Muster Plan  Redevelopment  
 General Plan Element  Planned Unit Development  Use Permit  Coastal Permit  
 Community Plan  Site Plan  Land Division (Subdivision, etc.)  Other: \_\_\_\_\_

Development Type:

Residential: Units \_\_\_\_\_ Acres \_\_\_\_\_  
 Office: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  
 Commercial: Sq.ft. 26.4k Acres \_\_\_\_\_ Employees \_\_\_\_\_  
 Industrial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  
 Educational: \_\_\_\_\_  
 Recreational: \_\_\_\_\_  
 Water Facilities: Type \_\_\_\_\_ MGD \_\_\_\_\_  
 Transportation: Type \_\_\_\_\_  
 Mining: Mineral \_\_\_\_\_  
 Power: Type \_\_\_\_\_ MW  
 Waste Treatment: Type \_\_\_\_\_ MGD  
 Hazardous Waste: Type \_\_\_\_\_  
 Other: Hotel - Up to 525 Guest Rooms

Project Issues Discussed in Document:

Aesthetic/Visual  Fiscal  Recreation/Parks  Vegetation  
 Agricultural Land  Flood Plain/Flooding  Schools/Universities  Water Quality  
 Air Quality  Forest Land/Fire Hazard  Septic Systems  Water Supply/Groundwater  
 Archeological/Historical  Geologic/Seismic  Sewer Capacity  Wetland/Riparian  
 Biological Resources  Minerals  Soil Erosion/Compaction/Grading  Growth Inducement  
 Coastal Zone  Noise  Solid Waste  Land Use  
 Drainage/Absorption  Population/Housing Balance  Toxic/Hazardous  Cumulative Effects  
 Economic/Jobs  Public Services/Facilities  Traffic/Circulation  Other: GHG

Present Land Use/Zoning/General Plan Designation:

Largely vacant (former auto dealership now closed). Zoning: ECSP-CG-2 & RM-48 PK. Gen Plan: Medium Mixed Use  
 Project Description: (please use a separate page if necessary)

The proposed includes the development of two hotels on two separate parcels, comprising up to a total of 525 guest rooms and 26,400 sq. ft. of commercial space. The North Parcel would include a 375-room full service hotel, along with approximately 16,400 sq. ft. of commercial uses for an FAR of 2.72. Building components on the North parcel would range in height from 1 to 7 stories, plus 2 levels of subterranean parking for up to 700 cars. The South Parcel would include development of an approximate 90,000 sq. ft. 150-room hotel and commercial use building ranging from 3 to 4 stories in height with an FAR of 2.98, and 2 levels of subterranean parking for up to 150 cars.

State Clearinghouse Contact: (916) 445-0613

State Review Began: 10-13-2015

SCH COMPLIANCE 12-08 11-30-2015

*Extended*

Please note State Clearinghouse Number (SCH#) on all Comments

SCH#: 2013101060

Please forward late comments directly to the Lead Agency

AQMD/APCD 23

(Resources: 10/17)

Project Sent to the following State Agencies

*JB*

<input checked="" type="checkbox"/> Resources	State/Consumer Svcs
<input type="checkbox"/> Boating & Waterways	General Services
<input type="checkbox"/> Coastal Comm	Cal EPA
<input type="checkbox"/> Colorado Rvr Bd	<input checked="" type="checkbox"/> ARB: ALL Other Projects
<input type="checkbox"/> Conservation	<input type="checkbox"/> ARB: Transportation Projects
<input checked="" type="checkbox"/> CDFW # <u>5</u>	<input type="checkbox"/> ARB: Major Industrial/Energy
<input type="checkbox"/> Delta Protection Comm	<input type="checkbox"/> SWRCB: Div. of Drinking Water
<input type="checkbox"/> Cal Fire	<input type="checkbox"/> SWRCB: Div. Financial Assist.
<input checked="" type="checkbox"/> Historic Preservation	<input type="checkbox"/> SWRCB: Wtr Quality
<input checked="" type="checkbox"/> Parks & Rec	<input type="checkbox"/> SWRCB: Wtr Rights
<input type="checkbox"/> Central Valley Flood Prot.	<input checked="" type="checkbox"/> Reg. WQCB # <u>4</u>
<input type="checkbox"/> Bay Cons & Dev Comm.	<input checked="" type="checkbox"/> Toxic Sub Ctrl-CTC
<input checked="" type="checkbox"/> DWR	Yth/Adlt Corrections
<input checked="" type="checkbox"/> OES	Corrections
<input type="checkbox"/> Resources, Recycling and Recovery	
CalSTA	Independent Comm
<input checked="" type="checkbox"/> Aeronautics	Energy Commission
<input checked="" type="checkbox"/> CHP	<input checked="" type="checkbox"/> NAHC
<input checked="" type="checkbox"/> Caltrans # <u>7</u>	<input checked="" type="checkbox"/> Public Utilities Comm
<input type="checkbox"/> Trans Planning	State Lands Comm
	Tahoe Rgl Plan Agency
Other	
<input type="checkbox"/> HCD	Conservancy
<input type="checkbox"/> Food & Agriculture	Other: _____

**Letter No. 1 [e-mail] Governor's Office of Planning and Research, State Clearinghouse and Planning Unit**

Scott Morgan, Director

Governor's Office of Planning and Research, State Clearinghouse and Planning Unit

December 2, 2015

**Response**

*Response 1-1*

While not a comment specific to the Draft EIR, the e-mail from the State Clearinghouse is included as part of the Final EIR in documenting acknowledgement of the City's decision to extend the public comment period on the Draft EIR.



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

December 21, 2015

Tracy Steinkruger  
City of Pasadena  
175 North Garfield Avenue  
Pasadena, CA 91101

Subject: Hill and Colorado Project  
SCH#: 2013101060

Dear Tracy Steinkruger:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 18, 2015, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

Document Details Report  
State Clearinghouse Data Base

SCH# 2013101060  
Project Title Hill and Colorado Project  
Lead Agency Pasadena, City of

Type EIR Draft EIR  
Description Note: Extended Review

The proposed project involves the establishment of a Planned Development District for two sites on opposite sides of Colorado Boulevard in the City of Pasadena. The proposed project involves the establishment of a Planned Development District that delineates development standards relative to building setbacks, heights, form, mass, scale, and other design considerations for future development at the site. Based on the proposed development standards, which can be considered to constitute a "development envelope," the project proponent proposes a potential development concept that would provide approximately 438,685 sf of building space at the project site for uses currently allowed under the existing zoning, specifically hotel development and commercial/retail uses.

Lead Agency Contact

Name Tracy Steinkruger  
Agency City of Pasadena  
Phone 626 744 6756 Fax  
email  
Address 175 North Garfield Avenue  
City Pasadena State CA Zip 91101

Project Location

County Los Angeles  
City Pasadena  
Region  
Lat / Long 34° 8' 45.6" N / 118° 7' 19.5" W  
Cross Streets Hill Avenue/ Colorado Blvd  
Parcel No. 5736-001-001 to 004; 5736-009-073  
Township Range Section Base

Proximity to:

Highways I-210 & I-710  
Airports No  
Railways Metro Gold Line  
Waterways No  
Schools Multiple  
Land Use East Colorado Specific Plan, Subdistrict 2 [College District], Commercial, General

Project Issues Air Quality; Archaeologic-Historic; Drainage/Absorption; Flood Plain/Flooding; Noise; Public Services; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services, California; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 10/13/2015 Start of Review 10/13/2015 End of Review 12/18/2015

CLEAR

12-18-15  
E

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-9140  
FAX (213) 897-1337  
www.dot.ca.gov



*Serious drought.  
Help save water!*

December 17, 2015



Ms. Tracy Steinkruger  
City of Pasadena  
175 N. Garfield Ave.  
Pasadena, CA 91101

RE: Hill and Colorado Project  
Vic. LA-210 /PM R 26.963  
SCH # 2013101060  
IGR/CEQA No. 151030AL-DEIR

Dear Ms. Steinkruger:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project includes the development of two hotels on two separate parcels, comprising up to a total of 525 guest rooms and 26,400 square feet of commercial space. The North Parcel would include a 375-room full service hotel, along with approximately 16,400 square feet of commercial uses. The South Parcel would include development of an approximately 90,000 square feet 150-room hotel and commercial use building.

In summer of 2015, the City of Pasadena adopted updated Mobility Element for the City of Pasadena General Plan and new amendment of the City's Transportation Analysis Guidelines. The adopted performance measures including Vehicle Miles Traveled per Capita, Vehicle Trips per Capita, Proximity and Quality of the Bicycle and Transit Network, and Pedestrian Accessibility. The proposed performance measures will assist in determining how to balance travel modes as well as understand the mobility needs of the community.

Caltrans encourages the City to promote Transportation Demand Management (TDM) and multi-model transportation planning that considers various modes (walking, cycling, automobile, public transit, etc.) and connections among modes. We understand it is difficult to grow and balance/reduce traffic at the same time. Both agencies are committed to work together in finding traffic solutions for the public.

During a teleconference on December 9, 2015 between the City and Caltrans regarding concerns related to the traffic study it was agreed that the comments outlined in Caltrans letter dated July 2, 2015 (see attached) would be applied. In the spirit of mutual cooperation, the City will provide additional traffic information to Caltrans and will continue to work with Caltrans in an

Ms. Tracy Steinkruger  
December 17, 2015  
Page 2

effort to evaluate traffic impacts, identify potential improvements, and establish a funding mechanism that helps mitigate cumulative transportation impacts in the area.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods. If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 151030AL.

Sincerely,



DIANNA WATSON  
Branch Chief  
Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

DEPARTMENT OF TRANSPORTATION  
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-9140  
FAX (213) 897-1337  
www.dot.ca.gov



Serious drought.  
Help save water!

Attachment

July 2, 2015

Mr. Vicrim Chima  
Planner, General Plan Manager  
City of Pasadena  
Planning & Community Development Department  
175 North Garfield Avenue  
Pasadena, CA 91109-7125

RE: Draft Land Use Element, and Draft Mobility  
Element for the Pasadena General Plan  
Update-Draft Environmental Impact Report  
Vic. LA-210, LA -134, LA-110 Citywide  
SCH # 2013091009  
Ref. IGR/CEQA No. 130909AL-NOP  
Ref. IGR/CEQA No. 150144AL-DEIR  
IGR/CEQA No. 150558AL-DEIR2

Dear Mr. Chima:

This letter is a follow up to Caltrans comment letter dated March 23, 2015. After meeting with the City staff on May 13, 2015 at Caltrans District 07 building, working closely with the City staff, and reviewing the City's response letter dated June 29, 2015 (attached), we have the following comments.

Caltrans concurs with the following new policies in the Mobility Element:

- **New Policy #1**

City of Pasadena will monitor and evaluate the development and adoption of future VMT/cap thresholds for the SCAG region and Los Angeles County.

- **New Policy #2**

City of Pasadena will involve Caltrans in the revision and update of the existing Transportation Impact Fee.

Mr. Vicrim Chima  
July 2, 2015  
Page 2

- **New Policy #3**

City of Pasadena will consider improvement to ITS projects involving Caltrans owned intersections at freeway ramp termini in the development of the future transportation impact fee, including but not limited to the I-210 Connected Corridors project.

- **New Policy #4**

City of Pasadena will work with Caltrans to evaluate access management needs and strategies to better manage traffic operations on arterial streets located within close proximity of freeway on/off-ramps in an effort to reduce traffic backups and frictions at Caltrans ramp signals.

Caltrans concurs with the new amendment in Section 2 of the City's Transportation Analysis Guidelines:

- **Amendment # 1**

All projects of "communitywide significance" (communitywide significance projects are defined as 50,000 square feet of new commercial use, 50 residential units, or any combination of the two) will require consultation with Caltrans to determine whether or not additional analysis is need regarding off-ramp queuing conditions. The analysis may lead to conditions of approval being placed on the project to reduce the queuing length on the off-ramps.

- **Amendment # 2**

A Caltrans encroachment permit is required for all projects requesting access to State right-of-way.

When Caltrans Guide for the Preparation of Traffic Impact Studies is updated or California Office of Planning and Research (OPR) develop guidance regarding SB 743, we would like to invite the City meet with Caltrans staff to discuss and potentially update the policies in the Mobility Element and related amendments.

Caltrans would like to thank the City staff for working closely with Caltrans staff and this letter serves as confirmation that Caltrans traffic concerns have been adequately addressed. We will continue to work with the City to minimize any future congestion on the State facilities. If you

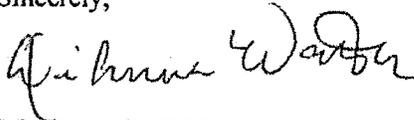
Mr. Vicrim Chima

July 2, 2015

Page 3

have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 150558AL.

Sincerely,



DIANNA WATSON

Branch Chief

Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse



DEPARTMENT OF TRANSPORTATION

June 29, 2015

Dianna Watson  
Branch Chief  
Community Planning & LD IGR Review  
Department of Transportation  
District 7 – Office of Transportation Planning  
100 S. Main Street, MS 16  
Los Angeles, CA 90012

**Re: Responses to Meeting and Discussions Regarding the Pasadena General Plan  
Update Draft EIR  
Ref. IGR/CEQA No. 150144AL**

Dear Ms. Watson:

We received your letter dated March 23, 2015 with your comments on Pasadena’s General Plan Update Draft Environmental Impact Report (DEIR) which included a request to meet with Pasadena staff and consultant. Thank you for meeting with us on May 13<sup>th</sup> at your offices to discuss the issues identified in your comment letter. Following that meeting staff from Caltrans and the Pasadena Department of Transportation have had numerous conversations and have worked collaboratively to develop our responses to issues raised by Caltrans regarding the Pasadena General Plan Draft EIR.

This letter summarizes the items discussed at the meeting and our responses.

The Land Use and Mobility Elements of the Pasadena General Plan include goals to encourage walking, bicycling, transit and other alternatives to motor vehicles and explicit policies to enhance and expand the pedestrian and bicycling infrastructure. The Land Use Element is a future land use plan that complements Pasadena’s commitment to focusing growth in Transit Oriented Districts and supports the type of local trip making best served by active transportation modes and reduce impacts from increased auto travel.

With the City of Pasadena being the first to adopt CEQA thresholds that do not include Auto Level of Service (LOS) the Draft General Plan review provides an opportunity to demonstrate how local agencies and Caltrans will collaboratively work together to address mobility (or addressing impacts to State transportation facilities) in a “Post SB 743” world.

Ms. Dianna Watson  
 June 29, 2015  
 Page 2 of 3

During the May 13<sup>th</sup> meeting, Caltrans questioned the City's choice of CEQA VMT/cap Threshold and expressed concern that the citywide VMT/cap threshold may be "higher" than what may be ultimately adopted by SCAG as a regional VMT/cap threshold. Caltrans staff acknowledged that under SB 743 cities are able to adopt CEQA thresholds as long as they are technically supported. Pasadena staff raised the issue of consistency in calculation of the VMT/cap and that depending on how either the VMT or the per capita is calculated the thresholds may not be comparable. Caltrans also raised the issue that future transportation impact fees could be an important opportunity to improve Caltrans owned intersections at freeway ramp termini. The City did commit at the meeting to developing additional policies in the Mobility Element that would address these concerns raised by Caltrans. The following are proposed new policies:

- New Policy City of Pasadena will monitor and evaluate the development and adoption of future VMT/cap thresholds for the SCAG region and Los Angeles County.
- New Policy City of Pasadena will involve Caltrans in the revision and update of the existing Transportation Impact Fee.
- New Policy City of Pasadena will consider improvements to ITS projects (including the I-210 Connected Corridors project) involving Caltrans owned intersections at freeway ramp termini in the development of the future transportation impact fee.

As discussed at the meeting the City of Pasadena and Caltrans are currently cooperating on the development of the I-210 Connected Corridors project to address congestion relief due to incidents on either freeway or city arterial streets. The goal of the future phases of the project is to also address recurring traffic congestion on freeway and adjacent arterial streets. The City is proposing to introduce the following policy into the Mobility Element to further respond to Caltrans' concern:

- New Policy City of Pasadena will work with Caltrans to evaluate access management needs and strategies to better manage traffic operations on arterial streets located within close proximity of freeway on/off-ramps in an effort to reduce traffic backups and frictions at Caltrans ramp signals.

Additionally, the City committed to amending the Transportation Analysis Guidelines in addition to introducing new policies, as a more appropriate mechanism to respond to certain issues raised by Caltrans at the May 13<sup>th</sup> meeting. In response to Caltrans' concern that future developments should assess any impacts to increased queuing on freeway off-ramps, the City will administratively amend Section 2 Table 3 (attached) of the City's Transportation Analysis Guidelines as follows:

All projects of "communitywide significance" (communitywide significance projects are defined as 50,000 square feet of new commercial use, 50 residential units, or any combination of the two) will require consultation with Caltrans to determine whether or not additional analysis is needed regarding off-ramp queuing conditions. The analysis

Ms. Dianna Watson  
June 29, 2015  
Page 3 of 3

may lead to conditions of approval being placed on the project to reduce the queuing length on the off-ramps.

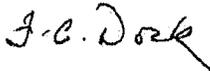
To ensure all projects adjacent to State right-of-way are obtaining the proper encroachment permits from Caltrans the following statement will be added to the City's Transportation Analysis Guidelines:

A Caltrans encroachment permit is required for all projects requesting access to State right-of-way.

We believe these responses along with the new Mobility Element Policies and the amendment to our Transportation Analysis Guidelines address the resolutions discussed at our meeting. Given the community interest in the adoption of the General Plan Update and our desire to release the Final EIR we would greatly appreciate a letter from you confirming the adequacy of our addressing the issues you and your colleagues have raised. Thank you again to the tremendous effort of your staff in collaborating with City staff in identifying issues and developing appropriate responses.

If you have any questions please contact Mark Yamarone, Transportation Administrator, at (626) 744-7474 [myamarone@cityofpasadena.net](mailto:myamarone@cityofpasadena.net).

Sincerely,



Frederick C. Dock, P.E., PTOE  
Director of Transportation

FCD: my

Attachment: Revised Section 2 – Pasadena Transportation Analysis Guidelines

c: Alan Lin, Project Coordinator, Caltrans – District 7  
Mark Yamarone, Transportation Administrator, Pasadena DOT



**SECTION 2: THRESHOLDS**

**Thresholds for Determining Impacts**

The guidelines apply to all projects that require environmental review in accordance with the California Environmental Quality Act and the City's established Environmental Policy Guidelines, significance thresholds, and transportation review guidelines. The thresholds contained herein determine a project's expected level of impact on the transportation system and identify appropriate types of mitigation.

**Table 2- Metrics' CEQA Thresholds of Significance**

METRIC		DESCRIPTION	IMPACT THRESHOLD
1.	VMT Per Capita*	Vehicle Miles Traveled (VMT) in the City of Pasadena per service population (population + jobs).	CEQA Threshold: An increase over existing Citywide VMT per Capita of 22.6.
2.	VT Per Capita	Vehicle Trips (VT) in the City of Pasadena per service population (population + jobs).	CEQA Threshold: An Increase over existing Citywide VT per Capita of 2.8.
3.	Proximity and Quality of Bicycle Network	Percent of service population (population + jobs) within a quarter mile of bicycle facility types.	CEQA Threshold: Any decrease in existing citywide 31.7% of service population (population + jobs) within a quarter mile of bike facilities.
4.	Proximity and Quality of Transit Network	Percent of service population (population + jobs) located within a quarter mile of transit facility types.	CEQA Threshold: Any decrease in existing citywide 66.6% of service population (population + jobs) within a quarter mile of transit facilities.
5.	Pedestrian Accessibility	The Pedestrian Accessibility Score uses the mix of destinations, and a network-based walk shed to evaluate walkability	CEQA Threshold: Any decrease in the Citywide Pedestrian Accessibility Score



Table 3- Metrics' Cap Outside of CEQA

METRIC		DESCRIPTION	CAP
1.	Street Segment Analysis	The street segment analysis assesses traffic intrusion on local streets in residential neighborhoods	Increases of 10-15% above existing on streets with more than 1500 ADT would trigger conditions of approval to reduce project vehicular trips
2.	Auto Level of Service	Level of Service (LOS) as defined by the Transportation Research Board's <i>Highway Capacity Manual (HCM)</i> .	A decrease beyond LOS D Citywide or LOS E within Transit Oriented Districts (TODs) would trigger conditions of approval to reduce project vehicular trips
3.	PEQI	Pedestrian Environmental Quality Index	Below average Conditions
4.	BEQI	Bicycle Environmental Quality Index	Below average conditions

All metrics in Tables 2 and 3 shall be analyzed for projects of "communitywide significance" under Category 2 in Table 1. All or any of the metrics in Table 3 might be required for analysis for Category 1 projects in Table 1 at the discretion of Director of Transportation. In addition to metrics in Table 3, all projects of "communitywide significance" will require consultation with Caltrans to determine whether or not additional analysis is needed regarding off-ramp queuing conditions. The analysis may lead to conditions of approval being placed on the project to reduce the queuing length on the off-ramps.

**Street Segment Analysis (Increase In Daily Traffic)**

Street Segment Analysis to address impacts to neighborhoods from traffic intrusion. The Average Daily Traffic (ADT) caps in Table 4 below measure the relative change in daily traffic resulting from an increase in trips or a change in access that alters existing traffic patterns. The relative change in daily traffic is determined as follows:

**Percentage of Increase = Net New Project Trips/Existing Daily Traffic**

A Street Segment analysis is required for all Category 2 projects identified in Table 1, or smaller projects at the discretion of Director of Transportation. The following criteria will be used for street segment analysis:



- Applies to "Projects of Communitywide Significance" which are defined as 50,000 square feet of new commercial use, 50 residential units or more, or any combination of the two (Category 2 project in Table 1).
- May apply to smaller projects identified as Category 1 projects in Table 1 at discretion of Director of Transportation
- The analysis would be limited to "Access" and "Neighborhood Connector" street types within a residential context (Street Types Map below)

Table 4- ADT Caps for Requiring Neighborhood Traffic Calming Measures

Existing ADT	Project-Related Vehicular Increase In ADT
0 to 1500	150 or more
1,501 to 3,499	10 percent or more of final ADT
3,500 or more	8 percent or more of final ADT

If project-related net trips exceed the caps in the table above conditions of approval would require the project applicant to develop and implement a targeted Complete Streets Plan with input from the affected residents, council districts and DOT to encourage use of non-vehicular modes by the project's patrons, and implement measures to discourage use of residential streets to-and-from the project site. Below is a list of typical measures that would be included in a Complete Streets Plan.

Project specific measures:

- Establish a more aggressive Average Vehicle Occupancy (AVO) target that exceeds city's AVO average by enhancing the required TDM plan under City's Trip Reduction Ordinance (TRO)
- Project turn-restrictions
- Revised project access and circulation

Complete Streets measures

- Curb Extensions
- Pedestrian and Bike Traffic signal upgrades/enhancements
- Turn-restrictions
- Neighborhood Gateways (raised medians)
- Traffic circles
- Speed humps
- Signal metering

**Letter No. 2 Governor's Office of Planning and Research, State Clearinghouse and Planning Unit**

Scott Morgan, Director  
Governor's Office of Planning and Research, State Clearinghouse and Planning Unit  
1400 10<sup>th</sup> Street  
Sacramento, CA 95812  
December 21, 2015

**Responses**

*Response 2-1*

Comment noted. Responses to the comment letter from the California Department of Transportation (Caltrans), which was the only state agency to provide comments on the Draft EIR, are provided below in Responses to Comment Letter 4.

**Steinkruger, Tracy**

---

**From:** Lin, Alan S@DOT <alan.lin@dot.ca.gov>  
**Sent:** Wednesday, November 25, 2015 9:39 AM  
**To:** Steinkruger, Tracy  
**Cc:** Watson, DiAnna@DOT  
**Subject:** Request of Extension for Hill & Colorado Project

Hi Tracy,

Per our conversation, Caltrans would like to request an extension to review this project. Here are my contact information.  1

Looking forward in working with you.

Happy Thanksgiving!

Alan Lin, P.E.  
Project Coordinator  
State of California  
Department of Transportation  
District 7, Office of Transportation Planning  
Mail Station 16  
100 South Main Street  
Los Angeles, CA 90012  
(213) 897-8391 Office  
(213) 897-1337 Fax

**Letter No. 3 [e-mail] California Department of Transportation (Caltrans)**

Alan Lin, Project Coordinator  
State of California  
Department of Transportation  
District 7, Office of Transportation Planning  
November 25, 2015

**Responses**

*Response 3-1*

The public comment period originally set for review of the Draft EIR for the Hill and Colorado Project was for 49 days (i.e., October 13, 2015 through November 30, 2015) which is longer than the 45 days typically provided for a Draft EIR comment period, and was subsequently extended for an additional 18 days, closing on December 18, 2015.

DEPARTMENT OF TRANSPORTATION  
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-9140  
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Serious drought.  
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December 17, 2015

Ms. Tracy Steinkruger  
City of Pasadena  
175 N. Garfield Ave.  
Pasadena, CA 91101

RE: Hill and Colorado Project  
Vic. LA-210 /PM R 26.963  
SCH # 2013101060  
IGR/CEQA No. 151030AL-DEIR

Dear Ms. Steinkruger:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project includes the development of two hotels on two separate parcels, comprising up to a total of 525 guest rooms and 26,400 square feet of commercial space. The North Parcel would include a 375-room full service hotel, along with approximately 16,400 square feet of commercial uses. The South Parcel would include development of an approximately 90,000 square feet 150-room hotel and commercial use building.

1

In summer of 2015, the City of Pasadena adopted updated Mobility Element for the City of Pasadena General Plan and new amendment of the City's Transportation Analysis Guidelines. The adopted performance measures including Vehicle Miles Traveled per Capita, Vehicle Trips per Capita, Proximity and Quality of the Bicycle and Transit Network, and Pedestrian Accessibility. The proposed performance measures will assist in determining how to balance travel modes as well as understand the mobility needs of the community.

2

Caltrans encourages the City to promote Transportation Demand Management (TDM) and multi-model transportation planning that considers various modes (walking, cycling, automobile, public transit, etc.) and connections among modes. We understand it is difficult to grow and balance/reduce traffic at the same time. Both agencies are committed to work together in finding traffic solutions for the public.

During a teleconference on December 9, 2015 between the City and Caltrans regarding concerns related to the traffic study it was agreed that the comments outlined in Caltrans letter dated July 2, 2015 (see attached) would be applied. In the spirit of mutual cooperation, the City will provide additional traffic information to Caltrans and will continue to work with Caltrans in an

3

Ms. Tracy Steinkruger  
December 17, 2015  
Page 2

effort to evaluate traffic impacts, identify potential improvements, and establish a funding mechanism that helps mitigate cumulative transportation impacts in the area.

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Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.

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Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods. If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 151030AL.

○  
5  
○

Sincerely,



DIANNA WATSON  
Branch Chief  
Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

**DEPARTMENT OF TRANSPORTATION**  
 DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING  
 100 S. MAIN STREET, MS 16  
 LOS ANGELES, CA 90012  
 PHONE (213) 897-9140  
 FAX (213) 897-1337  
 www.dot.ca.gov



*Serious drought.  
 Help save water!*

*Attachment*

July 2, 2015

Mr. Vicrim Chima  
 Planner, General Plan Manager  
 City of Pasadena  
 Planning & Community Development Department  
 175 North Garfield Avenue  
 Pasadena, CA 91109-7125

RE: Draft Land Use Element, and Draft Mobility  
 Element for the Pasadena General Plan  
 Update-Draft Environmental Impact Report  
 Vic. LA-210, LA -134, LA-110 Citywide  
 SCH # 2013091009  
 Ref. IGR/CEQA No. 130909AL-NOP  
 Ref. IGR/CEQA No. 150144AL-DEIR  
 IGR/CEQA No. 150558AL-DEIR2

Dear Mr. Chima:

This letter is a follow up to Caltrans comment letter dated March 23, 2015. After meeting with the City staff on May 13, 2015 at Caltrans District 07 building, working closely with the City staff, and reviewing the City's response letter dated June 29, 2015 (attached), we have the following comments.

Caltrans concurs with the following new policies in the Mobility Element:

- **New Policy #1**

City of Pasadena will monitor and evaluate the development and adoption of future VMT/cap thresholds for the SCAG region and Los Angeles County.

- **New Policy #2**

City of Pasadena will involve Caltrans in the revision and update of the existing Transportation Impact Fee.

Mr. Vicrim Chima  
July 2, 2015  
Page 2

- **New Policy #3**

City of Pasadena will consider improvement to ITS projects involving Caltrans owned intersections at freeway ramp termini in the development of the future transportation impact fee, including but not limited to the I-210 Connected Corridors project.

- **New Policy #4**

City of Pasadena will work with Caltrans to evaluate access management needs and strategies to better manage traffic operations on arterial streets located within close proximity of freeway on/off-ramps in an effort to reduce traffic backups and frictions at Caltrans ramp signals.

Caltrans concurs with the new amendment in Section 2 of the City's Transportation Analysis Guidelines:

- **Amendment # 1**

All projects of "communitywide significance" (communitywide significance projects are defined as 50,000 square feet of new commercial use, 50 residential units, or any combination of the two) will require consultation with Caltrans to determine whether or not additional analysis is need regarding off-ramp queuing conditions. The analysis may lead to conditions of approval being placed on the project to reduce the queuing length on the off-ramps.

- **Amendment # 2**

A Caltrans encroachment permit is required for all projects requesting access to State right-of-way.

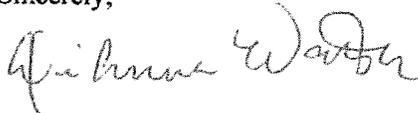
When Caltrans Guide for the Preparation of Traffic Impact Studies is updated or California Office of Planning and Research (OPR) develop guidance regarding SB 743, we would like to invite the City meet with Caltrans staff to discuss and potentially update the policies in the Mobility Element and related amendments.

Caltrans would like to thank the City staff for working closely with Caltrans staff and this letter serves as confirmation that Caltrans traffic concerns have been adequately addressed. We will continue to work with the City to minimize any future congestion on the State facilities. If you

Mr. Vicrim Chima  
July 2, 2015  
Page 3

have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 150558AL.

Sincerely,



DIANNA WATSON  
Branch Chief  
Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse



## DEPARTMENT OF TRANSPORTATION

June 29, 2015

Dianna Watson  
Branch Chief  
Community Planning & LD IGR Review  
Department of Transportation  
District 7 – Office of Transportation Planning  
100 S. Main Street, MS 16  
Los Angeles, CA 90012

**Re: Responses to Meeting and Discussions Regarding the Pasadena General Plan  
Update Draft EIR  
Ref. IGR/CEQA No. 150144AL**

Dear Ms. Watson:

We received your letter dated March 23, 2015 with your comments on Pasadena's General Plan Update Draft Environmental Impact Report (DEIR) which included a request to meet with Pasadena staff and consultant. Thank you for meeting with us on May 13<sup>th</sup> at your offices to discuss the issues identified in your comment letter. Following that meeting staff from Caltrans and the Pasadena Department of Transportation have had numerous conversations and have worked collaboratively to develop our responses to issues raised by Caltrans regarding the Pasadena General Plan Draft EIR.

This letter summarizes the items discussed at the meeting and our responses.

The Land Use and Mobility Elements of the Pasadena General Plan include goals to encourage walking, bicycling, transit and other alternatives to motor vehicles and explicit policies to enhance and expand the pedestrian and bicycling infrastructure. The Land Use Element is a future land use plan that complements Pasadena's commitment to focusing growth in Transit Oriented Districts and supports the type of local trip making best served by active transportation modes and reduce impacts from increased auto travel.

With the City of Pasadena being the first to adopt CEQA thresholds that do not include Auto Level of Service (LOS) the Draft General Plan review provides an opportunity to demonstrate how local agencies and Caltrans will collaboratively work together to address mobility (or addressing impacts to State transportation facilities) in a "Post SB 743" world.

Ms. Dianna Watson  
 June 29, 2015  
 Page 2 of 3

During the May 13<sup>th</sup> meeting, Caltrans questioned the City's choice of CEQA VMT/cap Threshold and expressed concern that the citywide VMT/cap threshold may be "higher" than what may be ultimately adopted by SCAG as a regional VMT/cap threshold. Caltrans staff acknowledged that under SB 743 cities are able to adopt CEQA thresholds as long as they are technically supported. Pasadena staff raised the issue of consistency in calculation of the VMT/cap and that depending on how either the VMT or the per capita is calculated the thresholds may not be comparable. Caltrans also raised the issue that future transportation impact fees could be an important opportunity to improve Caltrans owned intersections at freeway ramp termini. The City did commit at the meeting to developing additional policies in the Mobility Element that would address these concerns raised by Caltrans. The following are proposed new policies:

- New Policy City of Pasadena will monitor and evaluate the development and adoption of future VMT/cap thresholds for the SCAG region and Los Angeles County.
- New Policy City of Pasadena will involve Caltrans in the revision and update of the existing Transportation Impact Fee.
- New Policy City of Pasadena will consider improvements to ITS projects (including the I-210 Connected Corridors project) involving Caltrans owned intersections at freeway ramp termini in the development of the future transportation impact fee.

As discussed at the meeting the City of Pasadena and Caltrans are currently cooperating on the development of the I-210 Connected Corridors project to address congestion relief due to incidents on either freeway or city arterial streets. The goal of the future phases of the project is to also address recurring traffic congestion on freeway and adjacent arterial streets. The City is proposing to introduce the following policy into the Mobility Element to further respond to Caltrans' concern:

- New Policy City of Pasadena will work with Caltrans to evaluate access management needs and strategies to better manage traffic operations on arterial streets located within close proximity of freeway on/off-ramps in an effort to reduce traffic backups and frictions at Caltrans ramp signals.

Additionally, the City committed to amending the Transportation Analysis Guidelines in addition to introducing new policies, as a more appropriate mechanism to respond to certain issues raised by Caltrans at the May 13<sup>th</sup> meeting. In response to Caltrans' concern that future developments should assess any impacts to increased queueing on freeway off-ramps, the City will administratively amend Section 2 Table 3 (attached) of the City's Transportation Analysis Guidelines as follows:

All projects of "communitywide significance" (communitywide significance projects are defined as 50,000 square feet of new commercial use, 50 residential units, or any combination of the two) will require consultation with Caltrans to determine whether or not additional analysis is needed regarding off-ramp queueing conditions. The analysis

Ms. Dianna Watson  
June 29, 2015  
Page 3 of 3

may lead to conditions of approval being placed on the project to reduce the queuing length on the off-ramps.

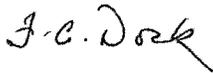
To ensure all projects adjacent to State right-of-way are obtaining the proper encroachment permits from Caltrans the following statement will be added to the City's Transportation Analysis Guidelines:

A Caltrans encroachment permit is required for all projects requesting access to State right-of-way.

We believe these responses along with the new Mobility Element Policies and the amendment to our Transportation Analysis Guidelines address the resolutions discussed at our meeting. Given the community interest in the adoption of the General Plan Update and our desire to release the Final EIR we would greatly appreciate a letter from you confirming the adequacy of our addressing the issues you and your colleagues have raised. Thank you again to the tremendous effort of your staff in collaborating with City staff in identifying issues and developing appropriate responses.

If you have any questions please contact Mark Yamarone, Transportation Administrator, at (626) 744-7474 [myamarone@cityofpasadena.net](mailto:myamarone@cityofpasadena.net).

Sincerely,



Frederick C. Dock, P.E., PTOE  
Director of Transportation

FCD: my

Attachment: Revised Section 2 – Pasadena Transportation Analysis Guidelines

c: Alan Lin, Project Coordinator, Caltrans – District 7  
Mark Yamarone, Transportation Administrator, Pasadena DOT



**SECTION 2: THRESHOLDS**

**Thresholds for Determining Impacts**

The guidelines apply to all projects that require environmental review in accordance with the California Environmental Quality Act and the City's established Environmental Policy Guidelines, significance thresholds, and transportation review guidelines. The thresholds contained herein determine a project's expected level of impact on the transportation system and identify appropriate types of mitigation.

**Table 2- Metrics' CEQA Thresholds of Significance**

METRIC		DESCRIPTION	IMPACT THRESHOLD
1.	VMT Per Capita*	Vehicle Miles Traveled (VMT) in the City of Pasadena per service population (population + jobs).	CEQA Threshold: An increase over existing Citywide VMT per Capita of 22.6.
2.	VT Per Capita	Vehicle Trips (VT) in the City of Pasadena per service population (population + jobs).	CEQA Threshold: An increase over existing Citywide VT per Capita of 2.8.
3.	Proximity and Quality of Bicycle Network	Percent of service population (population + jobs) within a quarter mile of bicycle facility types.	CEQA Threshold: Any decrease in existing citywide 31.7% of service population (population + jobs) within a quarter mile of bike facilities.
4.	Proximity and Quality of Transit Network	Percent of service population (population + jobs) located within a quarter mile of transit facility types.	CEQA Threshold: Any decrease in existing citywide 66.6% of service population (population + jobs) within a quarter mile of transit facilities.
5.	Pedestrian Accessibility	The Pedestrian Accessibility Score uses the mix of destinations, and a network-based walk shed to evaluate walkability	CEQA Threshold: Any decrease in the Citywide Pedestrian Accessibility Score



**Table 3- Metrics' Cap Outside of CEQA**

METRIC		DESCRIPTION	CAP
1.	Street Segment Analysis	The street segment analysis assesses traffic intrusion on local streets in residential neighborhoods	Increases of 10-15% above existing on streets with more than 1500 ADT would trigger conditions of approval to reduce project vehicular trips
2.	Auto Level of Service	Level of Service (LOS) as defined by the Transportation Research Board's <i>Highway Capacity Manual (HCM)</i> .	A decrease beyond LOS D Citywide or LOS E within Transit Oriented Districts (TODs) would trigger conditions of approval to reduce project vehicular trips
3.	PEQI	Pedestrian Environmental Quality Index	Below average Conditions
4.	BEQI	Bicycle Environmental Quality Index	Below average conditions

All metrics in Tables 2 and 3 shall be analyzed for projects of "communitywide significance" under Category 2 in Table 1. All or any of the metrics in Table 3 might be required for analysis for Category 1 projects in Table 1 at the discretion of Director of Transportation. In addition to metrics in Table 3, all projects of "communitywide significance" will require consultation with Caltrans to determine whether or not additional analysis is needed regarding off-ramp queuing conditions. The analysis may lead to conditions of approval being placed on the project to reduce the queuing length on the off-ramps.

**Street Segment Analysis (Increase in Daily Traffic)**

Street Segment Analysis to address impacts to neighborhoods from traffic intrusion. The Average Daily Traffic (ADT) caps in Table 4 below measure the relative change in daily traffic resulting from an increase in trips or a change in access that alters existing traffic patterns. The relative change in daily traffic is determined as follows:

**Percentage of Increase = Net New Project Trips/Existing Daily Traffic**

A Street Segment analysis is required for all Category 2 projects identified in Table 1, or smaller projects at the discretion of Director of Transportation. The following criteria will be used for street segment analysis:



- Applies to "Projects of Communitywide Significance" which are defined as 50,000 square feet of new commercial use, 50 residential units or more, or any combination of the two (Category 2 project in Table 1).
- May apply to smaller projects identified as Category 1 projects in Table 1 at discretion of Director of Transportation
- The analysis would be limited to "Access" and "Neighborhood Connector" street types within a residential context (Street Types Map below)

**Table 4- ADT Caps for Requiring Neighborhood Traffic Calming Measures**

Existing ADT	Project-Related Vehicular Increase In ADT
0 to 1500	150 or more
1,501 to 3,499	10 percent or more of final ADT
3,500 or more	8 percent or more of final ADT

If project-related net trips exceed the caps in the table above conditions of approval would require the project applicant to develop and implement a targeted Complete Streets Plan with input from the affected residents, council districts and DOT to encourage use of non-vehicular modes by the project's patrons, and implement measures to discourage use of residential streets to-and-from the project site. Below is a list of typical measures that would be included in a Complete Streets Plan.

Project specific measures:

- Establish a more aggressive Average Vehicle Occupancy (AVO) target that exceeds city's AVO average by enhancing the required TDM plan under City's Trip Reduction Ordinance (TRO)
- Project turn-restrictions
- Revised project access and circulation

Complete Streets measures

- Curb Extensions
- Pedestrian and Bike Traffic signal upgrades/enhancements
- Turn-restrictions
- Neighborhood Gateways (raised medians)
- Traffic circles
- Speed humps
- Signal metering

**Letter No. 4 Caltrans****Dianna Watson, Branch Chief**

Department of Transportation  
 District 7, Office of Transportation Planning  
 100 South Main Street  
 Los Angeles, CA 90012  
 December 17, 2015

**Responses***Response 4-1*

The introductory description of the project accurately reflects information presented in the Draft EIR.

*Response 4-2*

This discussion provides general information and recommendations for the City to consider and are not specific to the Hill and Colorado Project Draft EIR.

With regards to the promotion of Transportation Demand Management (TDM), the project is subject to the City's TDM/ Trip Reduction Ordinance (TRO) requirements.

*Response 4-3*

Caltrans' references its comment letter that was submitted on the City's General Plan Mobility Element on July 2, 2015. The City's Mobility Element was adopted on August 18, 2015, pursuant to a certified Final EIR (SCH # 2013091009). The City of Pasadena prepared Responses to Comments to Caltrans letter, which were included in the Final EIR for the General Plan (see Response to Comment A-2).<sup>1</sup>

The traffic analysis completed for the proposed Hill and Colorado Project was prepared in accordance with the City of Pasadena's current requirements, which, consistent with the intent SB 743, focus on impact metrics such as vehicle miles traveled per capita, vehicle trips per capita, proximity and quality of the bicycle and transit network, and pedestrian accessibility. Rather than the traditional Level of Service (LOS) impacts. Appendix G of the Draft EIR presents the project's *Traffic Impact Analysis CEQA Evaluation Category 2* document. This traffic study, along with Section 3.10 *Transportation and Traffic* of the Draft EIR analyzes all of the project's transportation-related CEQA impacts in accordance with the City of Pasadena's *Transportation Impact Analysis Current Practice & Guidelines* manual (City of Pasadena 2015) approved by City Council.

*Response 4-4*

Hydrology and water quality impacts associated with the project are discussed in Section 3.6 of the Draft EIR, which were determined to be less than significant.

*Response 4-5*

Comment noted. The project is required by Pasadena Department of Public Works to prepare a Construction Staging and Traffic Management Plan prior to the issuance of the first permit for construction. It should also be note that construction work hours typically occur outside the normal morning and

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<sup>1</sup>Pasadena General Plan Final Environmental Impact Report Response to Comments are available online at: <http://cityofpasadena.net/WorkArea/linkit.aspx?LinkIdentifier=id&ItemID=8589941229&libID=8589941232>

afternoon commute peak traffic hours, with construction workers arriving at their work site before 7 AM and leaving around 3 to 3:30 PM. Nevertheless, the City proposes the following as a standard condition of approval to require that the Construction Staging and Traffic Management Plan for the proposed project include the following limitation on construction-related heavy-duty truck delivery hours:

COA-T-1: Construction Truck Delivery Hours

Construction-related traffic (delivery trucks or haul trucks) shall be restricted to the hours between 9:00 AM to 3:00 PM to limit peak hour traffic conflicts along the local street network.



**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

November 5, 2015

Tracy Steinkruger  
City of Pasadena  
175 N. Garfield Avenue  
Pasadena, CA 91101

**RE: Colorado Hill Planned Development- City of Pasadena-Notice of Availability of the Draft Environmental Impact Report**

Dear Ms. Steinkruger:

Thank you for the opportunity to comment on the proposed Colorado Hill Planned Development located at 1347-1355 East Colorado Blvd, 39 North Hill Avenue and 1336 East Colorado Blvd in the City of Pasadena. The project consists of the development of an approx. 350,000 sq-ft hotel building with 375 guest rooms and ground floor commercial uses on the North parcel. For the South Parcel the project consists of a smaller hotel and ground floor commercial uses totaling 90,000 sq-ft. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

1

Metro bus lines 177, 180/181, 256, 687/686, and 780 operate on E Colorado Blvd, adjacent to the proposed project. One Metro bus stop on the corner of Colorado/Hill is directly adjacent to the proposed project. The following comments relate to bus operations and the bus stop:

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1. Although the project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus facilities and services that are present. The existing Metro bus stop must be maintained as part of the final project.

3

2. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus Operations. Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may impact Metro bus lines at least 30 days in advance of initiating construction activities. For closures that last more than six months, Metro's Stops and Zones Department will also need to be notified at 213-922-5188, 30 days in advance of initiating construction activities. Other municipal bus may also be impacted and should be included in construction outreach efforts.

4

3. LACMTA encourages the installation of bus shelters, benches and other amenities that improve the transit rider experience. The City should consider requesting the installation of such amenities as part of the development of the site.

5

4. Final design of the bus stop and surrounding sidewalk area must be Americans with Disabilities Act (ADA) compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.

6

Beyond impacts to Metro facilities and operations, LACMTA must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

7

- 1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
- 2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- 3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
- 4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

8

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The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

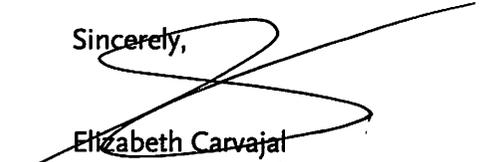
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Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

If you have any questions regarding this response, please contact Elizabeth Carvajal at 213-922-3084 or by email at DevReview@metro.net. LACMTA looks forward to reviewing the Draft EIR. Please send it to the following address:

LACMTA Development Review  
One Gateway Plaza MS 99-23-4  
Los Angeles, CA 90012-2952

Sincerely,



Elizabeth Carvajal  
Transportation Planning Manager

## APPENDIX

## D

# GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

*Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."*

## D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

## D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

### D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

### D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

**If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).**

### D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

**D.5.1 Existing Traffic Conditions.** Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

**D.5.2 Selection of Horizon Year and Background Traffic Growth.** Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

## D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

## D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

## D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

**D.8.1 Intersection Level of Service Analysis.** The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

**D.8.2 Arterial Segment Analysis.** For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

**D.8.3 Freeway Segment (Mainline) Analysis.** For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

**D.8.4 Transit Impact Review.** CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
  - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
  - For each time period, multiply the result by one of the following factors:
    - 3.5% of Total Person Trips Generated for most cases, except:
      - 10% primarily Residential within 1/4 mile of a CMP transit center
      - 15% primarily Commercial within 1/4 mile of a CMP transit center
      - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
      - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
      - 5% primarily Residential within 1/4 mile of a CMP transit corridor
      - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
      - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

## D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

**D.9.1 Criteria for Determining a Significant Impact.** For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ( $V/C \geq 0.02$ ), causing LOS F ( $V/C > 1.00$ ); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ( $V/C \geq 0.02$ ). The lead agency may apply a more stringent criteria if desired.

**D.9.2 Identification of Mitigation.** Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

**D.9.3 Project Contribution to Planned Regional Improvements.** If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

**D.9.4 Transportation Demand Management (TDM).** If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

**D.10 REFERENCES**

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

**Letter No. 5 Los Angeles County Metropolitan Transportation Authority (Metro)**

Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Los Angeles, California 90012  
Elizabeth Carvajal, Transportation Planning Manager  
November 5, 2015

**Responses**

*Response 5-1*

The project description summarized in the comment accurately reflects information provided in the Executive Summary of the Draft EIR.

*Response 5-2*

Comment noted. The specific Metro bus lines identified in the comment, as well as mention of the Metro bus stop on the corner of Colorado Boulevard and Hill Avenue, are all acknowledged in Table 3.10-4 on page 3.10-19 of the Draft EIR.

*Response 5-3*

The City of Pasadena concurs with Metro’s statement that the proposed project is not expected to result in impacts on transit. The project applicant (developer) is aware of the bus facilities and services that are present near the site.

*Response 5-4*

Although no significant impacts are expected to occur to Metro facilities and services during project construction, the City is proposing the following condition of approval:

**COA-T-2: Coordination with Public Transit Agencies During Construction**

At least 30 days prior to start of construction, the project applicant/developer shall contact public transit agencies with facilities and/or service occurring adjacent to the project site to review, discuss, and coordinate construction plans and activities, with the objective of ensuring there would be no construction-related impacts to such facilities/services. In the unlikely event that construction activities may affect bus operations, the applicant shall contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 as well as the City of Pasadena Transit Division at 626-744-7661 in advance of initiating construction activities.

*Response 5-5*

Impacts associated with transit facilities were determined to be less than significant in the Draft EIR. The City will, nevertheless, coordinate with the applicant for the improvement of the transit stop located at the northwest corner of Colorado Boulevard and Hill Avenue, and Metro’s comment will be forwarded to decision makers as part of the Final EIR for the project.

*Response 5-6*

Comment noted. The project shall comply with all applicable ADA requirements.

*Response 5-7*

Section 3.10.3.2 of the Draft EIR describes the requirements of the Los Angeles County Congestion Management Program, which correlate to the discussion in the subject comment, and the analysis of Impact TRAFFIC-2, beginning on page 3.10-27 of the Draft EIR, provides the required analysis.

*Response 5-8*

As discussed on page 3.10-29 of the Draft EIR, implementation of the proposed project is not expected to add 50 or more new trips per hour during the morning or afternoon peak hours to nearby CMP intersections (i.e., Arroyo Parkway/California Boulevard and Rosemead Boulevard/Foothill Boulevard), nor would the project add 150 or more trips per hour to the nearest CMP mainline freeway monitoring locations (i.e., I-210 Freeway west of SR-134 and at Rosemead Boulevard). As such, no further analysis is required.

*Response 5-9*

Caltrans was consulted through the Notice of Preparation (NOP) process, by both receiving a copy of the NOP/Initial Study from the City and providing a comment letter on the NOP, which is included in Appendix A of the Draft EIR.

*Response 5-10*

As indicated above in Response to Comment 5-3, implementation of the proposed project is not expected to result in any long-term impacts on transit and, as discussed above in Response to Comment 5-4, no significant impacts to transit are expected to occur during project construction.



COUNTY SANITATION DISTRICTS  
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
Telephone: (562) 699-7411, FAX: (562) 699-5422  
www.lacsd.org

GRACE ROBINSON HYDE  
Chief Engineer and General Manager

November 30, 2015

Ref File No.: 3487788

Ms. Tracy Steinkruger, Senior Planner  
Planning and Development Department  
City of Pasadena  
175 North Garfield Avenue  
Pasadena, CA 91101-1704

Dear Ms. Steinkruger:

**Comment Letter for the Colorado Hill Planned Development**

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on October 19, 2015. The proposed development is located within the jurisdictional boundaries of District No. 16. We offer the following comments:

1. Previous comments submitted by the Districts in correspondence dated November 15, 2013 (copy enclosed), to Mr. Jose D. Jimenez of your agency, still apply to the subject project with the following updated information. 1
2. The Districts' 18-inch diameter Allen Avenue Trunk Sewer Section 5 conveyed a peak flow of 1.1 million gallons per day (mgd) when last measured in 2015. The Districts' 12-inch diameter Allen Avenue Trunk Sewer Section 4 conveyed a peak flow of 0.5 mgd when last measured in 2015. 2
3. The San Jose Creek Water Reclamation Plant (WRP) currently processes an average flow of 69.4 mgd, and the Whittier Narrows WRP currently processes an average flow of 5.9 mgd. 3
4. The expected increase in average wastewater flow from the proposed project, described in Table 3.11-6 as a total of 525 hotel rooms, a 12,500-square-foot ballroom, 8,900 square feet of conference rooms, 16,400 square feet of commercial retail, and a 10,000-square-foot bar, is 82,963 gallons per day, after all structures on the project site are demolished. 4
5. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727. 5

Ms. Tracy Steinkruger

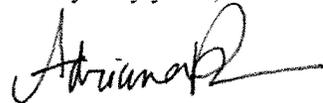
-2-

November 30, 2015

6. All other information concerning Districts' facilities and sewerage service contained in the document is current. 6

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,



Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar

Enclosure

cc: M. Sullivan  
M. Tatalovich



COUNTY SANITATION DISTRICTS  
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
Telephone: (562) 699-7411, FAX: (562) 699-5422  
www.lacsd.org

GRACE ROBINSON CHAN  
Chief Engineer and General Manager

November 15, 2013

Ref File No.: 2761719

Mr. Jose D. Jimenez, Planner  
Planning Department  
City of Pasadena  
175 North Garfield Avenue  
Pasadena, CA 91101-1704

Dear Mr. Jimenez:

**Hill and Colorado Planned Development**

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on October 21, 2013. The proposed development is located within the jurisdictional boundaries of District No. 16. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from both sites of the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to either or both the Districts' Allen Avenue Trunk Sewer Section 5, located in Allen Avenue at Homet Road, or the Allen Avenue Trunk Sewer Section 4, located in Allen Avenue at California Boulevard. The 18-inch diameter Allen Avenue Trunk Sewer Section 5 has a design capacity of 2.9 million gallons per day (mgd) and conveyed a peak flow of 1.4 mgd when last measured in 2010. The 12-inch diameter Allen Avenue Trunk Sewer Section 4 has a design capacity of 2.7 mgd and conveyed a peak flow of 0.8 mgd when last measured in 2010.
2. The wastewater generated by both sites of the proposed project will be treated at the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a design capacity of 100 mgd and currently processes an average flow of 74.5 mgd, or the Whittier Narrows WRP located near the City of South El Monte, which has a design capacity of 15 mgd and currently processes an average flow of 8.1 mgd.
3. The expected average wastewater flow from the north project site is 46,875 gallons per day (gpd). The expected average wastewater flow from the south project site is 29,250 gpd. For a copy of the Districts' average wastewater generation factors, go to [www.lacsd.org](http://www.lacsd.org), Wastewater & Sewer Systems, Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.
4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to

Mr. Jose D. Jimenez

-2-

November 15, 2013

construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://www.lacsd.org), Wastewater & Sewer Systems, Will Serve Program, and click on the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Chan



Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar

cc: M. Tremblay  
J. Ganz

## Letter No. 6 County Sanitation Districts of Los Angeles County

County Sanitation Districts of Los Angeles County  
1955 Workman Mill Road  
Whittier, California 90607  
Adriana Raza, Customer Service Specialist, Facilities Planning Department  
November 30, 2015

### Responses

#### Response 6-1

The Notice of Preparation comment letter submitted by the Districts on November 15, 2015 is included in Appendix A of the Draft EIR and was taken into consideration during preparation of the Draft EIR.

#### Response 6-2

Comment noted. The third full paragraph on page 3.11-4 of the Draft EIR is hereby revised with the updated information provided by the Districts as follows:

Wastewater flow originating from the project site will discharge to a local sewer line and connect with the Sanitation District's Allen Avenue Trunk Sewer Section 5 located in Allen Avenue at Homet Road, or the Allen Avenue Trunk Sewer Section 4, located in Allen Avenue at California Boulevard. The 18-inch diameter Allen Avenue Trunk Sewer Section 5 has a design capacity of 2.9 mgd and conveyed a peak flow of ~~1.4~~ 1.1 mgd when last measured in ~~2010~~ 2015. The 12-inch diameter Allen Avenue Trunk Sewer Section 4 has a design capacity of 2.7 mgd and conveyed a peak flow of ~~0.8~~ 0.5 mgd when last measured in ~~2010~~ 2015.

The updated information indicates that recent peak flows in the conveyance system near the project site is less than originally indicated in the Draft EIR, meaning that there is a greater amount of available capacity in the system than indicated in the Draft EIR. Consistent with the Draft EIR, wastewater impacts are still considered less than significant under impact UTILITIES-1.

#### Response 6-3

Comment noted. The first and second full paragraphs on page 3.11-4 of the Draft EIR are hereby revised with the updated information provided by the Districts as follows:

The Whittier Narrows WRP, near the City of South El Monte, has a capacity of 15 mgd of wastewater, and currently processes an average daily flow of ~~8.1~~ 5.9 mgd. Most of the water is used for groundwater replenishment at Rio Hondo and San Gabriel Coastal Spreading Grounds or for irrigation at an adjacent nursery.

The San Jose Creek Water Reclamation Plan WRP is located approximately 22 miles southeast of Pasadena near the City of Industry and has a treatment capacity of 100 mgd and currently processes and average flow of ~~74.5~~ 69.4 mgd.

The updated information indicates that recent average flows in the wastewater treatment plants serving the project site are less than originally indicated in the Draft EIR, meaning that there is a greater amount of available treatment capacity than indicated in the Draft EIR. Consistent with the Draft EIR, wastewater impacts are still considered less than significant under impact UTILITIES-1.

*Response 6-4*

NOP comments from the Los Angeles County Sanitation District estimated wastewater generation for the project at 76,125 gallons per day [46,875 for the north project site and 29,250 for the south project site]. (Appendix A, page 28.) Table 3.11-6 in the Draft EIR conservatively concluded the project would result in a wastewater generation rate of 79,273 gallons per day. The November 30, 2015 comment letter from LA County's Sanitation District indicates a wastewater generation rate slightly (i.e., 4.6 percent) greater than indicated in Table 3.11-6 of the Draft EIR. The comment does not include a breakdown of the wastewater generation estimate, such as provided in Table 3.11-6; however, the difference in the total wastewater generation is negligible and does not change the conclusions of the impacts analysis, even assuming the slightly greater amount.

*Response 6-5*

Comment noted.

*Response 6-6*

Comment noted.



November 30, 2015

Tracy Steinkruger  
City of Pasadena Planning Department  
175 N. Garfield Avenue  
Pasadena, CA 91101

Via Email

**RE: Hill and Colorado Project / Draft EIR Comments**

Dear Ms. Steinkruger,

We have reviewed the Draft EIR documents concerning the proposed Planned Development project at Hill and Colorado streets and its potential impact on historic resources. Pasadena Heritage is a community supported non-profit organization dedicated to the protection of our city's architectural and cultural historic resources. With regard to the cultural resources section of the draft environmental document, we offer the following comments for your consideration:

- In general, Pasadena Heritage agrees with the environmental analysis of the historic status of the H.G. Loud Auto Showroom buildings and the adjacent and nearby historic properties, including this segment of East Colorado Boulevard. However, under Section 3.3.2.2 Historical Resources Inventory, the document authors correctly describe the components of the resource's unique "drive-in" service design, but under 3.3.6 do not explicitly call out the service reception "island" for protection. 1
- We are in general agreement with the mitigation measures proposed for cultural resources, including the on-site interpretive display; HABS photodocumentation and drawings; repair of any construction-related damage; a thorough preservation, restoration, and adaptive use plan and associated HSR prepared by a qualified historic architect or historian; as well as noise and vibration protection for the adjacent and nearby historic properties. As noted above, we believe the service reception "island" is a character-defining feature to be protected. 2
- We note that Cultural Resources Section 3.3 correctly identifies the parties responsible for preparing or approving the mitigation measures under some, but not all, of the relevant sub-sections (page 3.3-31). For example, these parties are called out in MM-CR-1 sub-sections (b) licensed architect, and (d) Pasadena Museum of History archives, but not in sub-section (a) regarding the additional research (to be performed and retained by whom?). 3
- We further note that the Draft EIR inaccurately states under "Buildings Located on the Project Site" that the proposed Project calls for "...the removal and re-placement of the 'Welcome' sign" (page 3.3-26), when in fact the historic sign is to be retained and re-located, not replaced; the technical definitions of these terms carry different meanings 4

for preservation professionals and should therefore be revised accordingly to reflect requirements under Mitigation Measure MM-CR-3.

↑ 4

Thank you for this opportunity to provide feedback on the Draft EIR document and proposed measures. We look forward to reviewing the final documents as soon as they are released.

Sincerely,



Jesse Lattig  
*Preservation Director*

**Letter No. 7 Pasadena Heritage**

Pasadena Heritage  
 651 S. St. John Ave  
 Pasadena, CA 91105  
 Jesse Lattis, Preservation Director  
 November 30, 2015

**Responses***Response 7-1*

The commenter asks why the impact analysis in Section 3.3.6 of the Draft EIR Historic Resource chapter does not explicitly call out the service reception island. As discussed in Section 3.3.2.2 of the Draft EIR (page 3.3-10 through 11) and repeated below, only the new car showrooms were determined to be a significant historic resource:

The new car showrooms of the H. G. Loud Autos property have been determined eligible for listing in the National Register under Criteria C as one individual resource and assigned the Status Code of 3S. [¶] When the north and south parcels of the property were surveyed as part of the East Colorado Boulevard Specific Plan in 2003, only the showroom portions of the H.G. Loud Autos property were identified as historic resources. The other buildings located within the complex that comprised the H. G. Loud Ford Dealership did not meet the requirements to be individually identified as significant historic resources under the context of “Marketing and Servicing the Automobile.” The support buildings were not found to have made a significant contribution to the history of the automobile in Pasadena, nor were they found to be associated with any persons important in automotive history on a local, regional, or national level. The support buildings were constructed over a period of time that spanned from before-and-after the building of the Mid-Century styled showrooms, and do not present high artistic values or type of architecture. The buildings that were used for the service, maintenance, support, and repair of automobiles at H.G. Loud Autos were not found to have met the criteria on a local, state, or federal level to be determined significant historic resources.

In developing the framework for mitigating potentially significant historic resource impacts at the project site, consideration was given to those character-defining features that are necessary to convey the historic significance of the property, at which, in the case of the proposed project, the reception island is not a character-defining feature. By the very nature of the activity, all automobiles arrive at a dealership for service under their own power (driven in) or towed in, and the drivers must meet with service staff to describe what needs done to the vehicle and sign repair agreements. The buildings of the C. S. Mead Motor Company were designed so that the public would enter the service area of the facility from Colorado Boulevard between the two showroom buildings. The service driveway may have been designed with idea of visually marketing new cars, as the service customers would see the newest models of cars when they pulled in the driveway. The reception island was simply a place for the service writers to meet and greet the customers. The reception island itself does not present qualities of craftsmanship, public benefit, and visibility that contribute to the significance of the H.G. Loud Showrooms. The reception island is considered to be typical of automobile dealerships with a service facility, and the loss of the reception island does not lessen the significance of the showrooms. The City and its historic resource consultant found no evidence that the reception island of the H.G. Loud Autos made a significant contribution to the history of automobile repair and servicing on a local, regional, or statewide level. Most importantly, the reception island is almost entirely obscured from view when driving or walking along Colorado Boulevard, so the general public has not been, and is not, able for form an association between the reception islands and the significance of the H.G. Loud Auto showrooms.

In summary, Section 3.3.2.2 of the Draft EIR acknowledged that surrounding structures include the service reception “island,” however, this island was not determined to be a significant historic resource for the reasons described above. Nevertheless, while the surrounding structures were not determined to be significant historic resources, their loss was considered in the context of the “setting” of the historic showrooms. (Draft EIR page 3.3-28 [“With the removal of the surrounding buildings, structures [including the reception island], parking lots, and features that identify the showroom as being associated with the sale and marketing of automobiles, this aspect of integrity will be removed from the showroom’s ability to convey its historic significance.”].) Impacts without mitigation were determined to be significant due to the loss of the historic showroom setting. (Draft EIR page 3.3-30.) However, with implementation MM-CR-1 through CR-5, impacts to the loss of setting would be reduced to less than significant. As discussed on Draft EIR page 3.3-33, these mitigation measures “will assist in securing the showrooms a visual identity with the history with the sales of automobiles in Pasadena during the period of significance for the property from 1946 to 1960. The Mitigation Measures will assist in providing to a visitor or by-passer of the H.G. Loud Autos showrooms their association with the sales of autos, but also the role that the Mid-Century Modern architecture of the showrooms played in marketing the autos offered for sale after the end of World War II.”

#### Response 7-2

Comment noted. Please see Response 7-1 above.

#### Response 7-3

The comment asks who will be responsible for the “additional research” referenced under MM-CR-1(a). Each individual subsection of this mitigation measure should not be read in a vacuum. As noted at the beginning of this mitigation measure, “[t]he applicant shall be responsible for preparing documentation of the H.G. Loud Autos site...The HABS documentation shall be reviewed and approved by the City of Pasadena Department of Planning: Design and Historic Resources...” Subsection (d) notes that this documentation “shall be donated to the archives of the Pasadena Museum of History.” This is inclusive, of the data from each subsection of MM-CR-1.

#### Response 7-4

Comment noted. The first full paragraph on page 3.3-26 of the Draft EIR is hereby revised as follows:

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~~ relocation of the “Welcome” sign.

Comments on Colorado-Hill Hotel Project

November 30, 2015

I am a member of the Hill Ave. Grace Lutheran Church, 73 N. Hill Ave., Pasadena. I serve as President of the Congregation Council. Our church property borders on this “development” property at the northwest corner area. The Hill Ave. (east) end of our property borders on the Wedding Chapel / Prism Church property. Here are several comments.

1. It has been only since mid-November that we were made aware of the existence of a Draft EIR for this project. I am not aware that we (the church office) received a notice of a public hearing related to the planning of this project. Was there a public hearing? When? Neither the Pastor nor the Chair of Property Management are aware of any such mailings. 1
2. Your map does not recognize our property as a church. It incorrectly labels our property as “multi-family residential”. 2
3. The southwest portion of our property has historically been either a nursery school or a day school, although currently we do not have a day school. We have playground equipment just across the wall from the northwest corner of the property that is being considered for the Colorado-Hill Hotel development. We want to be able to use our facilities for children in the future. 3
4. We’re concerned that the draft EIR is incomplete, particularly the weakly worded mitigations that are mentioned for (a) air quality, (b) dust, including airborne hazardous material in the form of particulate matter that is caused by excavation, (c) noise and vibration, (d) the impact on church parking ingress and egress, (e) traffic congestion. The Colorado-Hill intersection area is already congested much of the time, as well as Hill Ave from Colorado to the 210 during the day. We expect a document with much more detailed descriptions of how these environmental impacts would be mitigated. 4
5. We expect to see a buffer zone included in your plan, at the north end of the property in question. 5

Robert T. Menzies

626-796-4212

## Letter No. 8 Grace Lutheran Church

Grace Lutheran Church  
 73 North Hill Avenue  
 Pasadena, CA 91106  
 Robert T. Menzies, President of the Congregational Council  
 November 30, 2015

### Responses

#### *Response 8-1*

A Notice of Preparation was mailed to property owners within 500 feet of the project site, which includes the address of the property on which Grace Lutheran Church is located. The Notice of Preparation was published on October 18, 2013.<sup>2</sup> Two noticed and agendaed scoping meetings were held on the project on November 7, 2013 and November 13, 2013.

Additionally, public notice of the availability of the Draft EIR was mailed to property owners and occupants within 500 feet of the project site, which includes the address of the property on which Grace Lutheran Church is located, as recently reconfirmed by staff. Also, the Notice of Availability for the Draft EIR was published on October 13, 2015 the City's website at <http://www.cityofpasadena.net/Hill-Colorado.aspx>. A public hearing was held at the City of Pasadena Planning Commission meeting on November 11, 2015 to provide comments on the Draft EIR and to receive comments from the public on the Draft EIR. Details regarding the date, time, and location of the subject public hearing were provided in the Notice of Availability, which, as noted above, was mailed to nearby property owners and published on the City's website approximately one month prior to the hearing.

#### *Response 8-2*

The commenter appears to be referring to Figure 3.8-1, Aerial Overview and Noise Monitoring Locations, of the Draft EIR and is correct in noting that the figure mistakenly labels the southwest portion of the Hill Avenue Grace Lutheran Church property as being "Multi-family Residences." That incorrect label has been removed and the corrected figure is provided in Section 2, Clarifications, Revisions, and Corrections, of the Final EIR. Additionally, other elements of Section 3.8, Noise and Vibration, in the Draft EIR that reference the subject area as being residential have been corrected in Section 2 of the Final EIR. It should be noted that those corrections do not change the conclusions of the Draft EIR relative to potential noise and vibration impacts associated with the proposed project, given that both residential uses and church uses are equally considered to be noise/vibration-sensitive uses.

#### *Response 8-3*

The proposed development would occur within the limits of the project site and will not extend onto the Grace Lutheran Church property.

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<sup>2</sup> Hill and Colorado NOP is available online at:  
<http://cityofpasadena.net/WorkArea/linkit.aspx?LinkIdIdentifier=id&ItemID=6442471248&libID=6442471216>

#### *Response 8-4*

The commenter generally asserts that mitigation measures for air quality, dust, noise and vibration, ingress and egress, and traffic congestion are “weakly worded.” There are 15 specific mitigation measures related to air quality, traffic and noise. The commenter does not provide any specific concerns about the text of the proposed mitigation measures.

The mitigation measures recommended in the Draft EIR adequately address the potential significant environmental impacts identified in the related impacts analyses. Such measures include Mitigation Measure MM-AQ-1 for reducing construction-related nitrogen oxide (NO<sub>x</sub>) emissions to levels that are less than significant, and Mitigation Measure MM-AQ-2 for reducing construction-related particulate matter (PM) emissions to levels that are less than significant.

Numerous mitigation measures, including MM-NOISE-1 through MM-NOISE-10 are recommended in the Draft EIR to reduce project-related noise impacts to levels that would be less than significant, and several additional requirements, as conditions of approval COA-NOISE-1 through COA-NOISE-6, also address noise.

Section 3.10, Transportation and Traffic, in the Draft EIR addresses project-related traffic impacts pursuant to the requirements of the City’s adopted *Transportation Impact Analysis Current Practice and Guidelines*, which were prepared in response to Senate Bill (SB) 743 as described in Section 3.10.3.3 of the Draft EIR. As described on page 3.10-5 of the Draft EIR, the passage of SB 743 in 2013 ushered in a new era for the evaluation of traffic impacts under CEQA. The bill directs the Office of Planning and Research (OPR) to amend the CEQA Guidelines to replace existing requirements for studying transportation impacts under CEQA. These previously existing requirements focused on auto delay and congestion, which are typically measured using level of service. These metrics will no longer be considered an environmental impact under CEQA. Rather, SB 743 requires OPR to establish criteria for determining the significance of transportation impacts that promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. On November 3, 2014 the City Council of Pasadena adopted new traffic analysis metrics, consistent with SB 743, through a public process.<sup>3</sup> The analysis provided in Section 3.10 of the Draft EIR reflects this new approach to the identification and evaluation of traffic impacts. Additionally, it should be noted that the traffic patterns for the Church and the development are not expected to be concurrent. The projected volumes along Holliston Avenue are expected to be significantly less than the projected capacity along Holliston Avenue.

The analysis in Chapter 3.10, Impact TRAFFIC-3, addresses safety concerns, including an analysis of ingress and egress from the project site, which notes that with installation of red curbs adjacent to the driveways there will be adequate sight lines for vehicular access. The proposed project would not change the current sight lines for the vehicular ingress and egress associated with the Grace Lutheran Church.

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<sup>3</sup> Prior to City Council adoption of new traffic metrics, numerous public meetings were held, which included five meetings before the Planning Commission, five meetings before the Transportation Advisory Commission, and two meetings before the Municipal Services Committee.

Notwithstanding all of the above, the commenter does not indicate, specifically, how or why the Draft EIR mitigation measures are felt to be incomplete.

*Response 8-5*

As reflected on the Project Site Plan, presented as Figure 2-5 in the Draft EIR, a separation distance of at least 20 feet will occur between the proposed hotel development on the North Parcel and the northern site boundary.

December 16, 2015

Ms. Tracy Steinkruger  
City of Pasadena  
Planning & Community Development Department  
175 N. Garfield Avenue  
Pasadena, CA 91101

Dear Ms. Steinkruger:

Presented below are comments submitted on behalf of the Holliston United Methodist Church (“Holliston” or “Church”) regarding the Draft EIR for the proposed mixed-use project at Hill and Colorado (“Project”). The Church has been at this location since 1923, after being moved stone by stone from its original location, at the corner of Colorado and Marengo.<sup>1</sup> Designed by prominent architect John C. Austin, who is also credited with the design of iconic Los Angeles landmarks such as the Los Angeles City Hall, Shrine Auditorium and Griffith Park Observatory,<sup>2</sup> the Church is a symbol of Richardsonian Romanesque and gothic architecture, a style rarely seen in Southern California today.<sup>3</sup> In 1986, Holliston was determined to be eligible for listing in the National Register of Historic Places. Holliston serves as the architectural and spiritual landmark for East Pasadena and surrounding communities.

1

Since the time of its original construction in 1899, through the Great Depression, multiple World Wars, and the transition into multicultural and multigenerational house of worship, Holliston Church’s robust and confident structure has been the constant that has welcomed and comforted those in the Lord. And it is this tradition of stewardship that causes us to jealously guard Holliston’s stature today.

2

Holliston currently consists of two congregations: Dream Church (Korean speaking) and the Community Church at Holliston (English speaking), a merger of the Holliston heritage ministry and the multi-cultural congregation. The two congregations have a total of approximately 700 to 1,000 parishioners on any given Sunday and share many of the Church facilities. In addition to having multiple services on Sunday, the Church hosts a variety of meetings and programs Monday through Saturday, with seniors and young children in attendance. These meetings and programs occur within the Church buildings, as well as outdoors around the Church campus.

3

Due to its close proximity, the proposed Project will have significant impact on Holliston. In addition to the apparent health and safety concerns that may arise from construction of the Project, the inclusion of a roof top bar, and significant traffic and parking impacts, the massive scale of the Project will leave an indelible architectural and development stamp on the area, the consequences of which are unpredictable and uncontrollable, once precedent has been established. In addition to these concerns, Holliston also offers the following technical concerns on the proposed Project:

4

<sup>1</sup> David Gebhard and Robert Winter, *Architecture Guidebook of Los Angeles*, p. 16 (2003).

<sup>2</sup> *Id.* at 193 and 260.

<sup>3</sup> *Id.* at 426.

Aesthetics

Although the Project site has been determined to be located in a Transit Priority Area (TPA), and therefore subject to the provision of SB 743 which makes it exempt from an aesthetics analysis, the City as the Lead Agency has and should exercise the authority to require one. The Initial Study clearly indicated that the project has potentially significant impacts to aesthetics, so for the City to completely ignore that analysis is negligent. As shown in the various renderings and photo simulations, the Project would clearly exceed the building scale and massing of the neighborhood in which it would be located. The scale of the proposed building would also create shade/shadow impacts and impair sightlines to the Church from Colorado Boulevard. We ask that the City revise the Draft EIR to include an Aesthetics analysis that evaluates the visual impact of the proposed Project to the neighborhood and surrounding properties, including a shade/shadow analysis and a visual quality analysis from key observation points.

5

Noise

The Noise analysis in Section 3.8 indicates that construction related noise impacts would be less than significant per the City's threshold of 85dBA at 100 feet and no mitigation is required. However, according to the description of existing conditions, the Church is located only 70 feet away from the Project site, so construction noise impacts could create a potentially significant impact. While the various conditions of approval, such as installation of a temporary sound wall, may help reduce impacts, the analysis should be updated to quantify projected dBA levels at the Church, especially at outdoor areas that are frequently utilized around the Church campus. A 12-foot high sound wall may not mitigate construction related impacts that occur on the upper stories of the proposed project.

6

To mitigate potential vibration-related impacts to the Church, MM-Noise-9 should include a measure similar to that of MM-Noise-7, that in the event of any vibration-caused damage, the Project Applicant shall be responsible for any repairs and that they would conform to the Secretary of Interior Guidelines.

Traffic

With regard to parking along Holliston Avenue, the Draft EIR incorrectly states that parking is not permitted along the eastern side of Holliston Avenue. Although the signage indicates otherwise, the City of Pasadena currently allows for parking along both sides of Holliston Avenue between Colorado and Walnut on Sundays.

7

The Project Description indicates that full ingress and egress to the Project site will be provided via a driveway on Holliston Avenue. Based on the parking situation described above, we believe that Holliston Avenue is not physically capable of handling Project-related traffic, for either truck deliveries or guests. The provision of this driveway would also create potential traffic conflicts for cars exiting the Church property on Holliston Avenue, which is nearly directly across the street from the proposed driveway. Therefore, we request that this driveway be removed from the Project and that all Project related traffic is routed via Hill or Colorado.

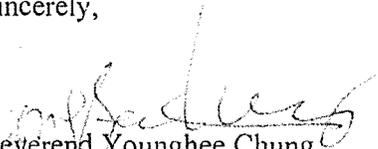
We ask that the City consider a condition of approval regarding parking. It is assumed that the hotel will charge hotel guests a parking fee, which may compel certain guests to park on the street, thereby reducing the number of street parking spaces available to church members on Sunday. Since a parking permit system is not practical as many church members do not reside in the area, we ask that the City works with the Applicant to find a solution to this potential issue.

Alternatives

We believe that the Reduced Project presented in Alternative 2 would be a more appropriately sized building for the scale of the neighborhood. While many of the construction and operational impacts of Reduced Project Alternative would remain the same and would still require mitigation, a three-storied building would have less of an impact on the visual character and residential feel of the neighborhood, while still achieving many of the Project Objectives. We hope that the City and the Applicant can further analyze this option as a viable design alternative to the proposed Project.

Thank you for your attention to our concerns. We look forward to working with you on this important project. Please direct any questions or comments to Charles Hong, Parish Trustee, at (818) 415-7232, or [charles\\_s\\_hong@yahoo.com](mailto:charles_s_hong@yahoo.com).

Sincerely,

  
Reverend Younghee Chung  
Dream Church

  
Reverend Sam Park  
Community Church at Holliston

c: Margo Morales, District Representative to Councilmember McAustin  
Grace Lutheran Church  
Prism Church

## Letter No. 9 Holliston United Methodist Church

Holliston United Methodist Church  
1305 East Colorado Boulevard  
Pasadena, CA 91106

Comment letter submitted by Charles Hong

Comment letter signed by Reverend Younghee Chung, Dream Church, and Reverend Sam Park, Community Church at Holliston

December 16, 2015

### Responses

#### *Response 9-1*

The indication that the Holliston United Methodist Church has been at its current location since 1923, after having been relocated from its original location, and that in 1986 it was determined eligible for listing in the National Register of Historic Places is consistent with the discussion on page 3.3-11 of the Draft EIR and page 24 of the Historic Resources Assessment Report in Appendix C of the Draft EIR. The additional information provided in the comment is appreciated by the City, although it does not change the historic resources impact analysis in the Draft EIR.

#### *Response 9-2*

Comment noted.

#### *Response 9-3*

Comment noted.

#### *Response 9-4*

The Draft EIR determined that construction and operation of the proposed project would not result in any unavoidable significant impacts. Potentially significant impacts were identified relative to air quality (see Section 3.1 of Draft EIR), cultural resources (Section 3.3), hazards and hazardous materials (Section 3.5), noise and vibration (Section 3.8), and transportation and traffic (Section 3.10). Recommended mitigation measures are identified in the Draft EIR specific to each of those impacts, which would reduce all of them to levels that are less than significant.

Potential health and safety impacts are addressed in Sections 3.1, 3.5, and 3.10.

The potential inclusion of a roof-top bar is not an environmental issue.

Section 3.10 of the Draft EIR addresses transportation and traffic impacts. Regarding parking and aesthetic impacts, the discussion on page 1-5 of the Draft EIR notes that Senate Bill 743, codified within CEQA as Section 21099 et. seq., states “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)). “Employment Center Project” means that a project located on property zoned for commercial uses with a floor area ratio or no less than 0.75 and that is located within a transit priority area. As indicated in Section 2, Project Description, the proposed project is in an area zoned to allow commercial uses and has a floor area ratio in excess of the 0.75 required so as to be classified as an “Employment Center Project”.

“Infill site” means that a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed within qualified urban uses. All of the project site has been previously developed and is surrounded by existing urban uses; hence, the project is on an infill site. Relative to being located within a transit priority area, according to Southern California Association of Governments (SCAG) housing and land use planning staff, 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. As such, the analysis of parking and aesthetic impacts is not required within an EIR.

Please see below for responses to the specific technical concerns indicated in the subsequent paragraphs of the comment letter.

#### *Response 9-5*

As indicated in several locations within the Draft EIR, specifically on pages ES-6, 1-5, and 3.1-2: “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 Senate Bill 743, codified within CEQA as Section 21099 et. seq., states ‘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)).” Section 2.7.1.1 of the Draft EIR includes, nevertheless, numerous (11) figures with illustrative concept views and visual simulations (Figures 2-17 through 2-27), providing the reader and decisionmakers with information to consider relative to how the proposed development will appear from various perspectives in the nearby area.

Senate Bill 743 was approved by the Governor on September 27, 2013, contemporaneous with the release of the Notice of Preparation/Initial Study.

#### *Response 9-6*

As indicated in Section 3.8.5 of the Draft EIR, the construction noise threshold of significance for construction noise is based on the City’s Noise Ordinance and is defined as “the operation of individual pieces of construction equipment that would generate noise in excess of 85 dBA at a distance of 100 feet. While construction noise at distances less than 100 feet may be greater than 85 dBA, the operative standard/threshold for determining significant construction noise impacts is a piece of equipment operating at 85 dBA at a distance of 100 feet. Furthermore, the majority of the construction equipment/activity will not be occurring at the property line. The City has included conditions of approval, which require placement of construction equipment away from noise-sensitive receptors (COA-NOISE-3).

Based on a noise attenuation rate of 6 decibels per doubling of distance, as indicated on page 3.8-20 of the Draft EIR, the difference in noise level at a distance of 70 feet rather than 100 feet is approximately +3 dB (i.e.,  $20 \log [70/100]$ ), which can, for general informational purposes, be applied to the construction noise levels in Tables 3.8-9 and 3.8-10 of the Draft EIR. It should be noted, however that the vast majority of the Holliston United Methodist Church facilities are situated at distances greater

than 70 feet from the project site.<sup>4</sup> The commenter does not specify where, what, and how outdoor areas are frequently used around the Church campus. The only clearly visible outdoor activity area that appears in an aerial photograph of the Church campus is a basketball court located in the northwest portion of the campus, which is approximately 185+ feet from the project site and is largely shielded by an intervening building. Regarding the recommended placement of a 10-foot-high noise barrier on the west side of the North Parcel, which will serve to reduce construction noise exposure impacts to Holliston United Methodist Church, it is true that the subject barrier may not fully shield noise emanating from construction on the upper stories of the proposed building, it should be noted that the taller portions of the building are located towards the center of the project site, well removed from the Church, and the majority of construction equipment with comparatively higher noise levels are ground-based – see Table 3.8-5 of the Draft EIR.

Regarding the inclusion of a provision in MM-NOISE-9 requiring the project applicant to be responsible for any vibration-caused damage to Holliston United Methodist Church, the subject mitigation measure has been revised as follows (new/additional text shown as being underlined):

**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).

*Response 9-7*

With regard to commenter's indication of parking restrictions and allowances along Holliston Avenue adjacent to the project site, the text in the fifth paragraph on page 3.10-6 is revised and clarified as follows (strike-out indicates deleted old text and underline indicates added new text):

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<sup>4</sup> The east side of the Holliston United Methodist Church, which is the side closed to the project site, is defined by building edges and architectural features that vary in distance from the project site, ranging from approximately 60 to 90 feet, with an average distance of approximately 70-75 feet. Extending west, away from the project site, the majority of the church building is increasingly more removed from the site, extending as far west as approximately 200 feet from the site. As such, the Draft EIR noise impacts analysis, which assumes a noise receptor distance of approximately 75 feet, is very conservative.

Adjacent to the North Parcel, “No Parking Any Time Except on Sundays” is allowed posted on the east side of the street adjacent to the North Parcel and “1 Hour Parking 9 AM to 6 PM” is posted on the west side of the street. Adjacent to the South Parcel, “No Parking Any Time” is posted on the west side of the street adjacent to the South Parcel and “2 Hour Parking 9 AM to 6 PM” is posted on the east side of the street.

The commenter states that Holliston Avenue is not physically capable of handling project-related traffic...” As noted in Response 8-4, the City updated its traffic significance threshold in 2014 to be consistent with the approach identified by the legislature in Senate Bill 743. This Senate Bill and the City’s new thresholds removed the traditional Level of Service methodology (which compares volume to capacity of intersections and street segments). The commenter’s statements suggests the usage of the more traditional LOS metric, however, this metric is no longer being utilized for CEQA analyses in the City of Pasadena. Furthermore, traffic counts taken in 2013 indicate that the usage of Holliston Avenue between Colorado Boulevard and East Union Street are relatively light, totaling only 890 vehicles over a 24 hour period (compare to Wilson Avenue between Colorado Blvd. and Green St. with 5,730 vehicles over a 24 hour period). Additionally, it is important to note that the traffic patterns for the Church and the proposed development are not expected to be concurrent.

The analysis in Chapter 3.10, Impact TRAFFIC-3, also addresses safety concerns, including an analysis of ingress and egress from the project site, which notes that with installation of red curbs adjacent to the driveways there will be adequate sight lines for vehicular access. Such protection of the line-of-sight for drivers existing a driveway, through the installation of red curbs adjacent to the driveway or other means, is a standard circulation system design requirement of the city. Additionally, it should be noted that Holliston Avenue has a curb-to-curb width of 32 feet, which is sufficient to accommodate emergency vehicles such as fire trucks and paramedic vehicles. Regarding the commenter’s traffic-related concerns, it should also be noted that, the ingress and egress points are shown in Figure 2-5, and are not limited to access via Holliston (as implied in the comment), but rather also include Colorado Boulevard and Hill Avenue. To help manage the distribution of truck delivery trips, the City will recommend, as a condition of approval, that incoming truck traffic access the project site via Hill Avenue only, and outbound truck traffic use only the Holliston Avenue access point, as follows:

#### **COA-T-3: Operations-Related Delivery Truck Access**

Due to the average daily volume of cars along Hill Avenue, delivery trucks shall access the site by traveling southbound along Hill Avenue to enter from the Hill Avenue project driveway, and exit from the Holliston Avenue project driveway. All loading spaces shall be designed and maintained so that the maneuvering, loading, or unloading of vehicles does not interfere with the orderly movement of traffic and pedestrians on any street.

#### **Response 9-8**

The commenter’s preference towards the Reduced Project Alternative is so noted.

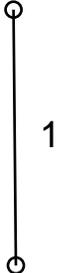
Comments on  
**Hill and Colorado Planned Development 1336 and 1355 East Colorado Boulevard  
and 39 North Hill Avenue**

Planning Commission of City of Pasadena  
175 N. Garfield Avenue, Pasadena, CA 91101  
Attn: Jose D. Jimenez (Planner)

Walter Choi  
6274 Hamilton Ln. La Crescenta, CA 91214  
walterchoi8@gmail.com  
Ph. 661-373-6950

To Whom It May Concern:

My name is Walter Choi, a member of Holliston United Methodist Church located on 1305 E. Colorado Blvd., Pasadena, CA 91106. Holliston UMC is located at the northwest corner of Colorado Boulevard and Holliston Avenue directly across Holliston Avenue from the subject proposed property (North Site) from its western border.



As a member of the church and father of two children (age 12 & 14) who attend the church at least twice a week, I have serious concerns about the proposed development of the property.

A. Safety

- a. Every Sunday, more than 600 people attends the church between 7AM to 4PM, many of them are Seniors and Children. Every morning from 5AM to 8AM, between 30 to 50 people come to church for early morning prayer. Almost every evening, there are events /classes/services and between 30 to 100 people participate in these activities.
- b. Holliston Avenue is the main exit for the church because only exit from the church parking lot is located on Holliston Avenue. In addition, Holliston Avenue is often used as main parking spaces for the church members during evenings and weekends. (There are limited parking spaces available in the church parking lot)

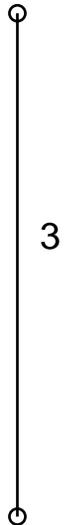


- c. Many church members, especially children. often cross Colorado Boulevard (currently, there is no traffic signal) to go to McDonalds and also walk across Holliston eastward and cross Hill Avenue to get to restaurants.
- d. Given above traffic pattern, anticipated heavy traffic (including trucks on narrow Holliston Avenue) around the church will pose a real and serious threat to the safety of church members including children and seniors.



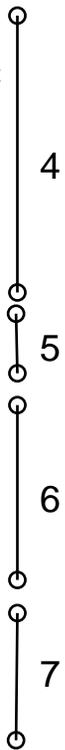
B. Noise/Vibration

- a. Holliston UMC is a historic landmark that was established on 1904. It contains many delicate features including stained glasses.
- b. As I mentioned above, there are several services (7 services and 6 prayer sessions) in a week and peaceful atmosphere is essential for those services.
- c. My biggest concern regarding noise/vibration is that the construction of this magnitude will inevitably cause a significant noise and vibration that will disturb the essential function of the church and possibly damage the invaluable structure irreparably.
- d. Another cause for concern is the proposed "rooftop pool & bar" in the development. The noise from the "Pool/Bar" might be masked during the day because of the traffic noise but it will cause quite a disturbance during the evening after traffic slows down.



C. Proposed Mitigation Measures

- a. To ensure safety of members of the church, especially young children, NO TRUCKS & HOTEL GUEST VEHICLES should be allowed in Holliston Avenue. Traffic should be directed to much wider Hill Avenue and Colorado Boulevard. Signs need to be posted and the applicant should be notified. If the entrance of trucks into the street is absolutely unavoidable, the hours should be restricted. I propose that trucks of certain size can come into Holliston Avenue between the hours of 9AM to 5PM on weekdays only.
- b. To ensure safety of pedestrian traveling southward, traffic signal must be installed at the cross section of Holliston & Colorado.
- c. To ensure safety of pedestrian travelling eastward, the main entrance (valet, drop off) should be moved to Hill Avenue from currently proposed Colorado Boulevard. If it is impossible to move the entrance in the Commission's judgment, you should require them to design an entry and exit to Colorado Boulevard such that safety of pedestrian is ensured.
- d. Even at extra cost, the applicant must make every effort to minimize the noise/vibration during construction and there should be no construction activity whatsoever between the hours of 7PM and 7AM during the weekdays and 7AM to 1PM on Sundays.



- e. I strongly urge the commission to consider ordering the applicant to make a change in its design to eliminate the “rooftop pool/bar.” As I explained above, it will definitely cause disturbance to the neighborhood. I know it is a “hot trend” to build a Roof Top Bar these days but you don’t build a roof top bar in the middle of three churches and residences. If you have to allow it, it must be under a very strict restrictions and enforcements. First, the level of noise must be controlled by prohibiting any excess noise (current proposal is too weak). Secondly, the open hours should be limited to 8AM to 8PM Weekdays and 3PM to 9PM on Sundays.

8

Thank you for your consideration.

Sincerely,

Walter Choi

**Letter No. 10 [Walter Choi]**

6274 Hamilton Lane  
La Crescenta, CA 91214  
November 18, 2015

**Responses***Response 10-1*

Comment noted. Detailed responses addressing the commenter's concerns are provided immediately below.

*Response 10-2*

The commenter asserts that every Sunday numerous individuals attend the church and suggests that there are safety concerns associated with anticipated heavy vehicle traffic and pedestrians. Please see Response 9-7 (Charles Hong) regarding the City's traffic methodology. The analysis in Chapter 3.10, Impact TRAFFIC-3, addresses safety concerns, including an analysis of ingress and egress from the project site, which notes that with installation of red curbs adjacent to the driveways there will be adequate sight lines, as also further discussed in Response 9-7 above. Furthermore, traffic counts taken in 2013 indicate that the usage of Holliston Avenue between Colorado and East Union Street are relatively light, totaling only 890 vehicles over a 24 hour period (compared to Wilson Avenue between Colorado Blvd. and Green St. with 5,730 vehicles over a 24 hour period). Additionally, construction activities (e.g. construction trucks) are not permissible on Sundays, as discussed on pages 2-58 and 3.8-12 of the Draft EIR.

*Response 10-3*

The historic characteristics of Holliston United Methodist Church are described in Section 3.3, Cultural Resources, of the Draft EIR. As indicated on page 3.3-11 of the Draft EIR, the church was determined to be eligible for listing in the National Register of Historic Places. The fact that the church contains substantial amounts of stained glass that, although the church is well-removed from the project site and is beyond the distance where construction-related vibration impacts would likely occur, the fragile nature of such glass was specifically acknowledged on page 3.3-31 of the Draft EIR as having the potential to be adversely affected. As a conservative precaution, Mitigation Measure MM-NOISE-9 is identified in Section 3.8, Noise and Vibration, of the Draft EIR for that specific impact. That measure is as follows:

**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).

Regarding the potential for construction-related vibration to result in human annoyance impacts at Holliston United Methodist Church, Table 3.8-12 on page 3.8-36 of the Draft EIR presents the estimated vibration levels associated with various types of construction equipment at different distances. As discussed on Draft EIR page 3.8-19, the threshold of significance of 0.24 peak particle velocity (ppv) inch(es) per second (in/sec). Significant annoyance impacts would occur at distances of approximately 23 feet or less from the most impactful type of equipment – a vibratory roller, which has a very limited purpose and would only be used for a very short duration(s) during the construction program. As indicated in Section 3.3 of the Draft EIR, Holliston United Methodist Church is located approximately 70 feet from the project site, as measured from the closest/eastern edge of the church. The estimated vibration levels for various types of construction equipment at that distance are as follows:

Equipment Type	Vibration Level ppv (in/sec) at a distance of 70 ft.
Vibratory Roller	0.045
Large Bulldozer / Hoe Ram	0.019
Loaded Trucks	0.016
Jackhammer	0.007
Small Bulldozer	0.001

As indicated in Table 3.8-8 on page 3.8-18 of the Draft EIR, a vibration level of 0.035 ppv (in/sec) is considered to be barely perceptible. Given the estimated vibration levels indicated above and the fact that actual distances between people within the church and construction equipment operating at the project site would typically be much greater than 70 feet, plus the fact that the typical days and hours of church services/activities, as described in the responses to Comments 10-2 above and 10-7 below, do not, for the most part, occur when most construction activities are anticipated to occur. Consequently, there would be no significant impacts associated with human annoyance at Holliston Church. Furthermore, the majority of the construction equipment/activity will not be occurring at the property line. The City has included conditions of approval, which require placement of construction equipment away from noise-sensitive receptors (COA-NOISE-3).

Regarding the potential for construction-related noise to result in a significant impact the function of Holliston United Methodist Church, the construction noise impacts analysis presented on pages 3.8-19 through 3.8-22 of the Draft EIR concluded that construction-related noise impacts would be less than significant. Nevertheless, several measures to reduce potential construction noise impacts are recommend as conditions of approval on the project. Those measures are presented on pages 3.8-23 through 3.8-27 of the Draft EIR and include, relative to Holliston United Methodist Church, the placement of a 10-foot tall construction noise barrier along the western edge of the project site (COA-

NOISE-1), various specific noise reduction specifications (COA-NOISE-3), and prohibiting the use of cranes or similar equipment within the right-of-way of Holliston Avenue (COA-NOISE-4). Also, as noted above, it is anticipated that the days and times of services and activities at the church would, for the most part, occur when construction activities are underway.

Operational noise impacts associated with the pool area were addressed on Draft EIR page 3.8-29. While the EIR analyzed and disclosed noise impacts to residences immediately adjacent to the project, impacts to sensitive receptors to the north and northwest (including Holliston Church), were determined to be less than significant. As discussed in the Draft EIR:

“The swimming pool would be 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.”

Furthermore, as discussed on page 3.8-31 of the Draft EIR, Mitigation Measure MM-NOISE-1 requires that, 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. Mitigation Measure MM-NOISE-2 on that same page requires that, 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. As such, no significant noise impacts are anticipated to occur from use of the proposed pool area.

#### *Response 10-4*

Please see Response to Comment 9-7.

#### *Response 10-5*

Please see Response to Comment 10-2.

#### *Response 10-6*

Comment noted. The proposed access along Colorado Boulevard is designed with separate, narrow one-way ingress and egress driveways to improve pedestrian safety. All guest pick-up and drop-off operations are expected to occur on-site and outside of public right-of-way.

#### *Response 10-7*

The Pasadena Noise Ordinance limits construction activity to between 7:00 a.m. and 7:00 p.m. on weekdays and between 8:00 a.m. and 5:00 p.m. on Saturdays within a residential district or within a radius of 500 feet therefrom, and construction is prohibited on Sundays and holidays within a residential district or within a radius of 500 feet therefrom. All of the North Parcel is within 500 feet of a Residential Zone. The construction activity limitations of the existing Pasadena Noise Ordinance are sufficient to address potential noise impacts.

*Response 10-8*

Please see below for the response to Mr. Charles Hong's Comment No.1 that he presented at the Pasadena Planning Commission Meeting on November 11, 2015.

**Steinkruger, Tracy**

**From:** Richard McDonald <rmcdonald@carlsonnicholas.com>  
**Sent:** Friday, December 18, 2015 4:57 PM  
**To:** Steinkruger, Tracy  
**Cc:** Parker, Kelvin; spolyzoides@mparchitects.com; Reyes, David  
**Subject:** Hill and Colorado Project Draft Environmental Impact Report dtd October 2015 -- Public Comment

Tracy – Thank you for providing us with a copy of the above-referenced EIR. We have reviewed it in some detail and understand that the public comment period for it ends today. As such, we wanted to provide you with the following comments for the City to respond to in the Final EIR:

1. With regard to the traffic study and Mitigation Measure (“MM”) T – 1:
  - a. What traffic warrant analyses or studies were conducted, if any, either under Chapter 4(c) of the Manual On Uniform Traffic Control Devices, or some other widely recognized or well established standard(s), to justify the installation of a traffic signal at the intersection of Holliston Avenue and Union Street?
    1. If any were done, did they include peak hour warrants? 4- hour warrants? 8- hour warrants?
  - b. What traffic warrant analyses or studies were conducted, if any, either under Chapter 4(c) of the Manual On Uniform Traffic Control Devices, or some other widely recognized or well established standard(s), to justify the installation of a traffic signal at the intersection of Holliston Avenue and Colorado Boulevard?
    1. If any were done, did they include peak hour warrants? 4- hour warrants? 8- hour warrants?
  - c. What traffic warrant analyses or studies were conducted, if any, either under Chapter 4(c) of the Manual On Uniform Traffic Control Devices, or some other widely recognized or well established standard(s), to justify the installation of a traffic signal at BOTH the intersection of Holliston Avenue and Union Street, and the intersection of Holliston Avenue and Colorado Boulevard?
    1. 1. If any were done, did they include peak hour warrants? 4- hour warrants? 8- hour warrants?
  - d. What data or facts from any such study(ies) shows the empirical basis for the installation of a traffic signal at the intersection of Holliston Avenue and Union Street?
  - e. What data or facts from any such study(ies) shows the empirical basis for the installation of a traffic signal at the intersection of Holliston Avenue and Colorado Boulevard?
  - f. What data or facts from any such study(ies) shows the empirical basis for the installation of a traffic signal at BOTH the intersection of Holliston Avenue and Union Street, and the intersection of Holliston Avenue and Colorado Boulevard?
  - g. What is the empirical basis under the City’s “TDF model”, and the specific calculations, for the conclusion that the project would decrease the existing Citywide service population by 0.3 percent?

h. Why did the “City’s calibrated TDF Model” (i.e., its travel demand forecasting model) use a “Percent of service population (population + jobs) located within a quarter mile of bicycle facility types” formula to calculate the “Proximity and Quality of Bicycle Network” metric as shown on page 8 of Appendix “G”, and discussed in Section 3.10.6?

1. How is this formula consistent with the formula approved by the City Council on November 3, 2014 and set-forth in Resolution 9398?

i. What is the “planned greenway along Holliston Avenue between Union Street and Colorado Boulevard? What signage is required for it? What pavement markings are required for it? What does the plans for it look like? What are the specific costs for it?

j. What is the legal nexus and required proportionality for requiring a contribution of funds for the “proposed bike lane (cycle track) on Union Street between Arroyo Parkway and Holliston Avenue, its connection to the existing bike lanes on Cordova Street via Holliston Avenue” when the project has no frontage on either Union Street or Cordova Avenue and there is no significant environment impact created by the project that the proposed mitigation measure addresses?

1. What do the plans for the proposed bike lane look like? What are the specific costs for it?

2. With regard to the cultural resources study, since the historic showroom is being kept, what is the legal nexus and required proportionality for MM-CR-1 to MM-CR-3?

If you have any questions regarding the above, please do not hesitate to contact me. Thank you. Have a good weekend.

Richard A. McDonald, Esq.  
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**Letter No. 11 Richard A. McDonald, Esq. – Representative for Project Applicant**

Of Counsel, Carlson & Nicolas, LLP  
 140 South Lake Avenue, Suite No. 251  
 Pasadena, CA 91101  
 December 18, 2015

**Responses***Response 11-1*

The vast majority of the individual concerns expressed in this comment pertain to the specific requirements identified in Mitigation Measure MM-T-1, particularly as related to the signalization of the intersections at Holliston Avenue/Union Street and Holliston Avenue/Colorado Boulevard. Those intersection improvements, along with the other improvements described in MM-T-1 (i.e., signage and pavement markings), are part of the Union Street Cycle Track Complete Streets Project, which is a planned bicycle improvement program proposed within the City of Pasadena and currently included in the City's Capital Improvements Program (CIP). Based on the Draft EIR analysis that concluded implementation of the proposed project would result in a significant impact related to proximity and quality of the City's bicycle network (i.e., the amount of new employees associated with the project would decrease the existing citywide percentage [31.7%] of service population located within a quarter mile of Level 1 and 2 bike facilities), the recommended mitigation is for the project applicant to contribute its fair share of funds towards implementation of the Union Street Cycle Track Complete Streets Project, which, in turn, would provide new Level 1 and 2 bicycle facilities within the City and compensate for the project's impact. Provided below is more explanation as to the basis for that mitigation approach, followed by a proposed revision to MM-T-1 that shifts the emphasis of the measure back to the overall Union Street Cycle Track Complete Streets Project rather than on individual improvements therein.

Objective 5 of the City's Bikeway Transportation Action Plan is to "Create a network of bikeways so that every neighborhood is within a quarter mile of an effective bicycle route in the north-south and east-west directions." The City Council adopted a quarter mile as the threshold of significance when evaluating service population access to bike facilities in Resolution 9398.<sup>5</sup> In turn, the Proximity and Quality of Bicycle Network metric measures the percentage of the City's service population (population plus jobs) within a quarter mile of bicycle facilities, where a quarter mile network distance buffer is calculated and the total population and jobs within the buffer are added. Improving measures of bicycle facility access may be achieved by improving and expanding existing bicycle facilities and encouraging residential and commercial development in areas with quality bicycle facilities.

The City's existing total overall service population is 247,286. The City's existing service population within a quarter-mile of Level 1 and 2 facilities is 78,415. The increase in service population of 2,184 attributable to the project results in a City total service population of 249,471. Since the project is not within a quarter mile of existing Level 1 and Level 2 bicycle facilities, the project's increase in service population results in a significant impact to the Proximity and Quality of Bicycle Network metric by decreasing the percentage of the existing service population within a quarter mile of existing Level 1 and Level 2 bicycle facilities in relation to the City's total overall service population from 31.7% to 31.4%. Any decrease in the percentage service population of 31.7% within a quarter mile of existing

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<sup>5</sup> [https://www.opr.ca.gov/docs/City\\_of\\_Pasadena.pdf](https://www.opr.ca.gov/docs/City_of_Pasadena.pdf)

Level 1 and Level 2 bicycle facilities indicates a significant impact. Additional information was also included in Draft EIR Section 3.10.4.1 and 3.10.6 regarding the City’s TDF model and bicycle impact analysis.

To mitigate this impact, the City proposed Mitigation Measure MM-T-1 [“Proximity and Quality of Bicycle Network”], which, as noted above, has been revised as presented at the end of this response. As part of the revised mitigation measure, the applicant shall make a fair share fund contribution towards the Union Street Cycle Track Complete Streets Project. This project will install two-way protected bicycle lanes along Union Street from Hill Street to Arroyo Parkway; a road diet along Union Street from three to two lanes; new traffic signal heads at intersections for cyclists; signalization of additional intersections along Union Street; and new signals along Holliston Avenue. The signalization of these intersections is included in the program to enhance the bicycling experience and enhance bicycle safety and is not based upon a traffic warrant analysis.

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 (“USCTCS”). Contribution of funds will reduce the project’s impact to a level of insignificance by increasing the project’s service population access to Level 1 and Level 2 bicycle facilities.

$$\frac{\text{Proposed Project's Service Population}}{\text{Service Population within a } \frac{1}{4} \text{ mile of the USCTCS}} \times (\text{Total Cost of the USCTCS})$$

Based on the above, Mitigation Measure MM-T-1 has been revised as follows (strike-out indicates old deleted text and underline indicates new added text):

#### **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, ~~t~~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:

$$\frac{\text{Proposed Project's Service Population}}{\text{Service Population within a } \frac{1}{4} \text{ mile of the USCTCS}} \times (\text{Total Cost of the USCTCS})$$

~~for the proposed protected bike lane (cycle track) on Union Street between Arroyo Parkway and Holliston Avenue, its connection to the existing bike lanes on Cordova Street via Holliston Avenue.~~

~~–The installation of a traffic signal at the intersection of Holliston Avenue/Union Street is being proposed as a project mitigation measure for this unsignalized intersection because a fully signalized intersection will increase safety for cyclists using the approved Union Street cycle track which runs from Hill Street to Arroyo Parkway and for cyclists using the Holliston Avenue bicycle boulevard project which runs from Union Street to Cordova Street.~~

~~The installation of a traffic signal at the intersection of Holliston Avenue/Colorado Boulevard is being proposed as a project mitigation measure for this unsignalized intersection because a fully signalized intersection will increase safety for cyclists using the approved Union Street cycle track which runs from Hill Street to Arroyo Parkway and for cyclists using the Holliston Avenue Bicycle Boulevard project which runs from Union Street to Cordova Street.~~

~~The applicant or successor agency shall contribute funds to install signage and pavement markings for the planned greenway along Holliston Avenue between Union Street and Colorado Boulevard to increase safety for cyclists.~~

#### *Response 11-2*

As described in the *Analysis of Impacts on the Integrity of the H.G. Loud Autos Showroom* on pages 3.3-27 through 3.3-30 of the Draft EIR, the H.G. Loud Autos Showroom had been found to be eligible listing in the National Register of Historic Places and, in order to be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity. The National Register traditionally recognizes a property's integrity through seven aspects or qualities: location, design, setting, materials, workmanship, feeling, and association. The Draft EIR contains an analysis of how each of the seven aspects of integrity would be affected by the proposed project, which demonstrates that implementation of the project would maintain four of the seven aspects of the historic resource's integrity—location, design, materials, and workmanship; however, the project has the potential to adversely affect the remaining three of the seven aspects of the historic resource's integrity: setting, feeling, and association.

Specifically, the setting of the H.G. Loud Autos Showroom, and its spatial relationship to the components of the property related to the sales and marketing of automobiles (i.e. the new and used automobile sales lots and support buildings), aid in establishing the character and purpose of the showrooms on East Colorado Boulevard. With the removal of the surrounding buildings, structures, parking lots, and features that identify the showroom as being associated with the sale and marketing of automobiles, this aspect of integrity will be removed from the showroom's ability to convey its historic significance. Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. In the case of the proposed project, some historic integrity will be maintained, such as the showroom architectural character from the period of significance of post-World II and its original use as space for the indoor exhibition of large objects for sale, but some of the property's historic integrity relative to feeling will be lost with the removal of car sales lot and various buildings that, together, helped define the prominent automobile dealership that existed along historic Route 66 in Pasadena at the time. Relative to association, that is the direct link between an important historic event or person and a historic property. In the case of the proposed project, historic integrity related to association will be degraded. The C.S. Mead Chevrolet/H.G. Loud Autos dealership has maintained sufficient physical integrity to convey its association with the theme of automobile sales and service in Pasadena, and with its association with the sales of automobiles along the corridor of East Colorado Boulevard. The projected project will have an adverse effect on this aspect of the showroom ability to convey this aspect of association because with the removal of the surrounding buildings, structures, parking lot, and features that identify the showroom as being associated with the sale and marketing of automobiles, this aspect of integrity will be removed from the showroom's ability to convey its historic significance.

Mitigation Measure MM-CR-1 serves to document and memorialize the historic integrity of the overall H.G. Loud Autos site in a manner that is specifically established and widely accepted for that very

purpose – that being through the use of Historic American Building Survey. Mitigation Measure MM-CR-2 will provide a “history of the automobile in Pasadena” interpretive display for public viewing in one of the remaining showroom sections of the H.G. Loud Autos complex. In so doing, it will help maintain and convey the overall historic character and significance of the entire complex that would otherwise not occur by simply retaining a single structure on the property (i.e., the showroom building). Similarly, Mitigation Measure MM-CR-3 provides for development of 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 to help maintain and convey the overall historic character and significance of the entire complex within the remaining showroom portion of the complex. This will help compensate for the project’s adverse impact to the historic integrity of the site relative to setting, feeling, and association, and do so in an established and acceptable manner, that being through adherence to the Secretary of the Interior’s Guidelines for the Treatment of Historic Properties.

### 3.2.2 Comments Received at the Public Hearing on Draft EIR

The following summarizes oral comments and responses on environmental topics that were received from the public and the City of Pasadena Planning Commission at the public hearing held on the Draft EIR on Wednesday, November 11, 2015 and provides responses to those comments. Comments are paraphrased and not written verbatim. The audio comments and responses are available online at: [http://pasadena.granicus.com/MediaPlayer.php?view\\_id=32&clip\\_id=3589](http://pasadena.granicus.com/MediaPlayer.php?view_id=32&clip_id=3589).

#### *City of Pasadena Planning Commission Initial Comments*

**Commissioner Nelson:** Can you please clarify what an “employment center project” is under SB 743.

**Response:** David Reyes - It is a project on property zoned for commercial uses with a floor area ratio of at least 0.75 and located in a transit priority area.

**Commissioner Jones:** Comments at this time are on Draft EIR only, correct?

**Response:** David Reyes - Yes. Another meeting will focus on the design concepts and planning of the proposed project.

**Commissioner Farhat:** The PD will allow to change the law regarding how much development can occur on the site?

**Response:** David Reyes - The proposed project does not conflict with an adopted plan. It is consistent with the General Plan policy to ask for more FAR through a PD.

**Commissioner Farhat to Mr. Richard McDonald (representative for the applicant):** I gather from schematics that the seventy-foot tall area that was looming over the antique shop has now been removed. If you are standing at Holliston, directly east of the antique shop, what is next to the show room?

**Response:** Richard McDonald - The pool and drop-off/pick-up area.

**Commissioner Farhat to Mr. McDonald:** What is next to the building that does not belong to you?

**Response:** Richard McDonald - There is a pool and four-story structure, north of the pool. The architect designed the hotel structure into blocks.

**Commissioner Jones to Mr. McDonald:** What is a boutique hotel?

**Response:** Mr. McDonald - To some people, it is a hotel with a room count. To others, it is a specific style of a unique brand. To others, it is a complimentary smaller hotel or auxiliary to a larger hotel. In this case, the boutique hotel will compliment a larger, grand hotel. In the industry, it is a subject of great debate.

*Public Comments (Begins at Approximately 41 minutes into the audio recording)*

**Charles Hong (trustee from Holliston Church)**

Comment No. 1: We are opposed to this project and have serious concerns about traffic, the environment, and health and safety issues. The church means a lot to the community; thus, we are protecting the stature of the church. A roof-top bar attracts an element that creates distraction and traffic. I do not need to talk about the subject of driving under the influence. The church is filled with children and seniors. It would be a public health and safety hazard. The project involves ingress and egress through Holliston Avenue.

**Response:** The commenter's opposition to the proposed project is so noted and, in conjunction with review of the comments and written responses presented in this Final EIR for the project, will be considered by decisionmakers before action is taken on the project. Traffic impacts associated with the project are addressed in Section 3.10, Transportation and Traffic, of the Draft EIR in accordance with the City's current traffic impact analysis requirements.

Please see Response 10-2 (Walter Choi), which discusses ingress, egress, and safety. Please see Response 9-7 (Hong) for discussion of the City's traffic methodology and safety analysis. Please see Response 10-3 (Walter Choi) for discussion of the pool and noise. The comment also suggests there are safety concerns associated with Driving Under the Influence. The decision to issue a license which permits the serving of alcohol is typically addressed by the California Department of Alcohol Beverage Control.<sup>6</sup> The project will need to comply with the licensing requirements, before alcohol can be sold on site. Furthermore, as discussed in the Draft EIR 3.10-25, the project would result in a reduction in Vehicles Miles Traveled, in comparison to baseline condition. Furthermore, the project involves development in a transit priority area, which is aimed at reducing reliance upon vehicular transportation. Consequently, given these factors, the project is expected to reduce DUI's from a regional perspective in comparison to baseline conditions.

**Rosana Wittlesex**

Comment No. 2: The City of Pasadena is a historically important city and Holliston Church is a historic landmark. I have seen an extreme number of changes in the City of Pasadena. We want to maintain our beautiful church. It is the only church in Pasadena that was moved from its original location. People sacrificed in 1923 for this. I hope that you will see that this community is a neighborhood resource. Please mitigate the vibration effects associated with this project. It will cause damage to its windows.

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<sup>6</sup> <http://www.abc.ca.gov/permits/permits.html>

**Response:** Please see Response to Comment 10-2 above regarding the Draft EIR’s recognition of the Holliston United Methodist Church and the construction-related vibration impacts.

### Steve Kim

**Comment No. 3:** I am member of Holliston Church. The project site has been vacant for a while, attracting homelessness. We have hoped for the city to do something with this site. However, we are not in favor of this project. The project is not suitable for this site. First, we do not approve a 90-foot structure in this area. Secondly, we do not believe that the mitigation measures are enough to reduce traffic impacts. Sure, a traffic signal will help on Holliston, but allowing full egress and ingress will create a traffic nightmare. What about delivery trucks and garbage trucks? The church itself is more than 100 years old. I am not a structural engineer but excavating the project site will structurally damage the church which is 50 feet away. This is not acceptable to us. Please consider other alternatives. We do not think the Draft EIR has identified all impacts.

**Response:** The commenter’s position of not being in favor of the project, and the reasons why, are so noted. Please see Response 10-2 (Walter Choi), which discusses ingress, egress, and safety. Please see Response 9-7 (Hong) for discussion of the City’s traffic methodology and safety analysis, and also an acknowledgement that the City will require, as a condition of approval, that incoming truck traffic access the project site via Hill Avenue only, and outbound truck traffic use only the Holliston Avenue access point. Regarding the comments that the project will damage the church, please see Response 10-3 (Walter Choi), which discusses construction vibration. To the extent the commenter is referencing ensuring adequate foundation support for the surrounding structures, the project is required to comply with California Code of Regulations, Title 24 (California Building Code). CBC Part 2, Volume 2, Chapter 18, Section 1804.1 states “excavation for any purpose shall not remove lateral support from any foundation without first underpinning or protecting the foundation against settlement or lateral translation.”

Section 4, Alternatives, identifies several potential alternatives to the proposed project, which can be considered by decision-makers.

It is not clear from the comment as to what other impacts need to be identified in the Draft EIR.

### John Lee

**Comment No. 4:** I want to reiterate some concerns. I have three children attending Holliston Church. Specifically, I am concerned with the narrowness of the street. I am not sure the street is wide enough for emergency access for fire trucks and paramedic vehicles. My child was struck two years ago by a vehicle. The roof-top bar is a concern too. If a guest comes from the bar to his/her vehicle—driving under the influence—that is an issue because they tend to use minor streets to avoid police. Was a lighting study done for the project? Has the zoning been modified for this project? As far as the seismic study, will needs be further studied on vibration.

**Response:** Holliston Avenue has a curb-to-curb width of 32 feet, which is sufficient to accommodate emergency vehicles such as fire trucks and paramedic vehicles. Please see Response 10-2 (Walter Choi), which discusses ingress, egress, and safety. Please see Response 9-7 (Hong) for discussion of the City’s traffic methodology and safety analysis. Regarding the comments that the project will damage the church, please see Response 10-3 (Walter Choi), which discusses construction vibration. The decision to issue a license which permits the serving of alcohol is typically addressed by the California Department of Alcohol Beverage

Control.<sup>7</sup> The project will need to comply with the licensing requirements, before alcohol can be sold on site. Furthermore, as discussed in the Draft EIR 3.10-25, the project would result in a reduction in Vehicles Miles Traveled, in comparison to baseline condition. Furthermore, the project involves development in a transit priority area, which is aimed at reducing reliance upon vehicular transportation. Consequently, given these factors, the project is expected to reduce DUI's from a regional perspective in comparison to baseline conditions.

Pursuant to Pub. Res. Code § 21099(d)(1), aesthetic impacts are not considered significant for employment center projects in transit priority areas. This includes impacts associated with lighting. (CEQA Guidelines, Appendix G, Section I(d).) The project site is located within a highly urbanized area having numerous existing sources of artificial light including street lights, motor vehicle lights, interior and exterior building lights, and parking lot lighting. Lighting associated with development of the project site would be subject to numerous control requirements set forth in the City's Municipal Code including the following:

The proposed project would be required to adhere to the following sections of the Pasadena Municipal Code:

- Section 17.40.080, regulates glare and outdoor lighting. Specifically, all lighting shall be directed downward or onto specific doors and entryways of buildings for security purposes and away from surrounding properties and public rights-of-way. Flashing lights and high-intensity lights are prohibited.
- Section 17.48.100, General Provisions for On-Premise Signs, regulates the appearance and lighting of commercial signs, requiring, among other provisions, that the artificial illumination of signs, either from an internal or external source, be designed to eliminate negative impacts on surrounding rights-of-way and properties.
- Section 17.48.110.D, Neon Signs and Architectural Lighting, limits the use of lighting for architectural accent.
- Section 17.61.030, requires new lighting fixtures, as well as exterior finish, colors, and materials to be closely evaluated through the design review process, which further ensures that project lighting would be sensitive to, and compatible with the surrounding community. This regulatory procedure provides the City with an opportunity to incorporate additional conditions to improve the project building materials and lighting features.

Additionally, detailed design and construction plans for the project are subject to review and approval by the City's Design Commission. The Design Commission's jurisdiction includes advisory review of architecture, materials, scale, massing, color, lighting, landscaping, open space and other design concepts (PMC, Title 2, Chapter 2.80). In light of the above, no significant lighting impacts are expected to occur from the project.

Regarding zoning, Section 2.7.1.2 explains that the proposed project would establish a new Planned Development District at the project site under Section 17.26.020(C) of the Pasadena Municipal Code. The Planned Development District provides a unique approach for developing

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<sup>7</sup> <http://www.abc.ca.gov/permits/permits.html>

large parcels of land with a minimum site area of two acres. The Planned Development District is intended to allow greater flexibility in site usage and building design, while still meeting the intent of the General Plan and maintaining compatibility with the surrounding properties.

Regarding seismic studies, the submittal of detailed design and construction plans for the project would include the provision of a geotechnical study and data on how the development plans provide for seismic safety in accordance with building code requirements.

### **Walter Choi**

Comment No. 6: I am a member of the Holliston Church. I share the same concerns. I think we are losing a battle with the developer. Under the noise and vibration section, mitigation measure #4 calls for no trucks to enter Holliston Avenue between the hours of 10 PM and 7 AM. I want this restriction to start at 9 PM, instead of 10 PM. Also, no truck access on Sundays, please. There are kids. No trucks coming into Holliston Avenue.

There is no mention on foot traffic. Lots of kids from church, cross Hill Avenue to go to restaurants (e.g., Jack 'n the Box and El Pollo Loco). According to project, there will be a valet entrance in the middle of that block. I request for the Planning Commission to request applicant to allow the public to walk alongside Colorado Boulevard.

**Response:** The comments expressed by Mr. Choi at the Planning Commission are included in the written comments that were subsequently submitted to the Planning Department. Please see Responses to Comments 10-1 through 10-8 above. Please also see Response 9-7 (Hong) for discussion of the City's traffic methodology and safety analysis. The commenter's suggestion to change the proposed truck delivery times will be forwarded to the decision makers. However, the measures, as currently drafted, are sufficient to reduce impacts to less than significant.

### **Younghee Chung**

Comment No. 7: I am senior pastor of Holliston Church. There are a thousand community members that attend our church. We have weekly activities. Our church parking lot is not large enough. We have permission to park on nearby streets, including Holliston Avenue. Our purpose to provide accessible services will be greatly affected by parking availability and noise levels. It will impact our future growth and weekly activities. Also, Holliston Avenue is really narrow. I ask you to consider these issues before you approve or disapprove this project.

**Response:** As described in Section 2, Project Description, of the Draft EIR, the project includes provision of on-site off-street parking to meet the project's needs. As such, it is not anticipated that implementation of the project will affect the availability of church parking on nearby streets. Furthermore, parking impacts under CEQA for this project are not considered significant pursuant to Pub. Res. Code § 21099(d)(1). Potential noise impacts are addressed in Section 3.8, Noise and Vibration, of the Draft EIR. As indicated therein, no unavoidable significant noise impacts are anticipated to occur from the project.

*Motion to Close Public Comment was approved (Occurs at Approximately 60 minutes into the audio recording)*

**Commissioner Farhat:** Church members raised important issues. I do think that Holliston Avenue is narrow. I think the Draft EIR should do more studies on safety as it relates to the drop-off and delivery-

truck areas, the interaction of pedestrian and automobiles, and church parking. Additional analyses should be done. The Draft EIR should study if truck activities on Holliston should stop at 9 PM, instead of 10 PM. There should also be no construction activity on Sundays. It was not clear to me how vibration would be reduced on church windows. I would like additional work to be done on that. Absolutely, the traffic study is what it is. I will not spend time on the metrics on that.

**Response:** Please see Response 8-4 (Menzie's) and Response 9-7 (Charles Hong) which discusses the City's traffic methodology and safety analysis. The analysis in Chapter 3.10, TRAFFIC-3, addresses safety concerns, including an analysis of ingress and egress from the project site, which notes that with installation of red curbs adjacent to the driveways there will be adequate sight lines. Regarding the comments that the project will damage the church, please see Response 10-3 (Walter Choi), which discusses construction vibration.

**Commissioner Jones:** Can staff get us information on SB 743 (such as, articles on why it was passed and how it came up)?

**Response:** David Reyes - Will do.

**Commissioner Nelson:** Holliston Street is a very narrow street. The pool hours starting at 5AM is too early. It will create noise issues with adjacent residents.

**Response:** David Reyes - Noise associated with the project will comply with the noise ordinance. Please see Draft EIR pages 3.8-29 through 31 for discussion of pool related noise.

**Commissioner Farhat:** Please circulate public comments.

**Response:** Public comments submitted during the review period for the Draft EIR are included in this Final EIR.

**Commissioner Hansen:** The speakers did a very good job on expressing noise and vibration issues. The church has valuable stainless glass windows. This historic resource needs to be taken care of. Perhaps, a preservation architect be onsite during construction activities to make sure that the resources is protected in every possible way. It's a significant resource in our history.

The issue of lighting. If hotel will have spot lighting, it needs to avoid light bleed and intensity. Additional analysis is warranted.

On sidewalk safety, the Draft EIR needs to look at safety mitigation due to egress and ingress traffic access in terms of mobility.

On street safety for children, I advise the possibility of studying speed humps to ensure vehicles would not go at a speed that would endanger children and pedestrians.

**Response:** Regarding noise and vibration, please see Response to Comment 10-3 above.

Regarding lighting, please see the response above to the comments that Mr. John Lee provided at the Planning Commission Hearing.

Regarding pedestrian safety, please see Response to Comment 10-2 above. It should be noted that speed humps are considered on streets where the traffic volumes in both directions are at least 1,000 vehicles per day and no more than 4,000 vehicles per day; however, traffic counts collected in 2013 determined that Holliston Avenue had a 24-hour volume count of 894 between Union Street and Colorado Boulevard (i.e., traffic volumes are less than the threshold for installing speed

humps). Also, speed humps should not be installed on street segments less than 1,200 feet. Holliston Avenue between Union Street and Colorado Boulevard is approximately 700 feet long (i.e., segment length is less than the threshold for installing speed humps).



## 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 an 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.

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**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
<b>Air Quality</b>						
<b>MM-AQ-1:</b> 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			
<b>MM-AQ-2:</b> 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			
<b>Cultural Resources</b>						
<b>MM-CR-1:</b> 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.	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
<p>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.</p> <p>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.</p> <p>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.</p>						
<p><b>MM-CR -2:</b> 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</p>	Project Applicant	<p>Design and content shall be approved prior to issuance of demolition permit</p> <p>Installation shall be completed and inspected prior to a certificate of</p>	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
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.		occupancy for the showroom building				
<b>MM-CR -3:</b> 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			
<b>MM-CR-4:</b> 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	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
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).						
<b>MM-CR-5:</b> 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			
<b>MM-CR-6:</b> 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	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
<p>be collected for processing and examination for very small vertebrate fossils.</p> <p>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.</p>						
<b>Hazards and Hazardous Materials</b>						
<p><b>MM-HAZ-1:</b> 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.</p>	Construction Contractor	During grading/ excavation	Department of Planning and Community Development, Fire Department			
<p><b>MM-HAZ-2:</b> 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,</p>	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
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.						
<b>MM-HAZ-3:</b> 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			
<b>Noise and Vibration</b>						
<b>MM-NOISE-1:</b> 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			

Mitigation Measure	Responsible Implementation Party	Monitoring Period	Monitor/ Reporter/ Monitoring Agency	Documentation of Compliance		
				Action/Reports	Effectiveness	Sign-off/Date
<p><b>MM- NOISE-2:</b> 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.</p>	Applicant	Prior to issuance of hotel occupancy permit	Department of Planning and Community Development			
<p><b>MM- NOISE-3:</b> 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.</p>	Applicant	Prior to issuance of building permits	Department of Planning and Community Development			
<p><b>MM- NOISE-4:</b> 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:</p> <ol style="list-style-type: none"> <li>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.</li> </ol>	Applicant	Prior to issuance of occupancy permits	Department of Planning and Community Development			
<p><b>MM-NOISE-5:</b> 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).</p>	Applicant	Prior to issuance of building permits	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
<p><b>MM- NOISE-6:</b> 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:</p> <ul style="list-style-type: none"> <li>• Review the project plans for demolition and construction.</li> <li>• 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.</li> <li>• Prepare and submit a report to the Director of Planning and Community Development that includes but is not limited to the following:                             <ul style="list-style-type: none"> <li>○ Any description/survey information obtained under the second bullet point.</li> <li>○ 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.</li> <li>○ Specific measures to be taken during construction to ensure the specified vibration level limits are not exceeded.</li> </ul> </li> </ul>	Applicant	Prior to approval of grading plans and/or prior to issuance of demolition, grading and building permits	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
<ul style="list-style-type: none"> <li>○ 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.</li> </ul> <p>Examples of measures that may be specified for implementation during demolition or construction include, but are not limited to the following:</p> <ul style="list-style-type: none"> <li>• Prohibition of certain types of construction equipment.</li> <li>• The requirement for lighter-tracked or wheeled equipment.</li> <li>• Specifying demolition by non-impact methods, such as sawing concrete.</li> <li>• Organization of phasing so as to avoid simultaneous vibration sources.</li> <li>• Installation of vibration-measuring devices to guide decision making for subsequent activities.</li> </ul>						
<p><b>MM- NOISE-7:</b> 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).</p>	Applicant	At the conclusion of vibration-causing activities.	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
<p><b>MM- NOISE-8:</b> 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.</p>	Construction contractor	At least 5 days prior to the start of construction	Department of Planning and Community Development			
<p><b>MM- NOISE-9:</b> 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.</p> <p>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</p>	Applicant	Prior to approval of grading plans and/or prior to issuance of demolition, grading and building permits	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
other codes if applicable such as the California Historical Building Code (California Code of Regulations, Title 24, Part 8).						
<p><b>MM- NOISE-10:</b> 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:</p> <p>Vibratory rollers or similar vibratory compaction equipment shall not be used within 25 feet of the <del>Grace Lutheran Church Complex</del> 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 <del>Grace Lutheran Church Complex</del> 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.</p>	Construction contractor	Prior to approval of grading plans and/or prior to issuance of demolition, grading and building permits.	Department of Planning and Community Development			
<b>Traffic and Transportation</b>						
<p><b>MM-T-1:</b> 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</p>	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
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: $\left(\frac{\text{Proposed Project's Service Population}}{\text{Service Population within a 1/4 mile of the USCTCS}}\right) \times (\text{Total Cost of the USCTCS})$						