

ATTACHMENT F

GENERAL PLAN ENVIRONMENTAL IMPACT REPORT AND APPENDICES (2015)

Please visit <https://www.cityofpasadena.net/planning/general-plan-2015-draft-documents/>
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August 2015 | Revised Final Environmental Impact Report

PASADENA GENERAL PLAN

for City of Pasadena

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1. Introduction

1.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and CEQA Guidelines (California Administrative Code Section 15000 et seq.).

According to CEQA Guidelines, Section 15132, the FEIR shall consist of:

- (a) The Draft Environmental Impact Report (DEIR) or a revision of the Draft;
- (b) Comments and recommendations received on the DEIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies comments on the DEIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

This document contains responses to comments received on the DEIR for the Pasadena General Plan Update during the public review period, which began January 22, 2015, and closed March 24, 2015. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated DEIR comprise the FEIR, in accordance with CEQA Guidelines, Section 15132.

1.2 FORMAT OF THE FEIR

This document is organized as follows:

Section 1, Introduction. This section describes CEQA requirements and content of this FEIR.

Section 2, General Comments. This section includes responses to recurring comments.

Section 3, Response to Comments. This section provides a list of agencies and interested persons commenting on the DEIR; copies of comment letters received during the public review period, and individual responses to written comments. This section also includes responses to comments received at a two community forums and 11 commission hearings regarding the DEIR. To facilitate review of the responses, each comment letter has been reproduced and assigned a number (A-1 through A-8 for letters received from agencies and organizations, R-1 through R-10 for letters received from residents, F1 and F2 for comments received during the community forums, and C1 for comments received from the commissions). Individual comments have been numbered for each letter and the letter is followed by responses with references to the corresponding comment number.

1. Introduction

Section 4. Revisions to the DEIR. This section contains revisions to the DEIR text and figures as a result of the comments received by agencies and interested persons as described in Section 3, and/or errors and omissions discovered subsequent to release of the DEIR for public review.

Section 5, Errata to FEIR dated July, 2015. This section is an errata to the FEIR dated July, 2015.

Section 6, Refined Project Environmental Analysis. This section provides an environmental analysis of the Refined Project.

The responses to comments contain material and revisions that will be added to the text of the FEIR. City of Pasadena and expert consultants have reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the DEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the DEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of DEIRs should be “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines Section 15204(c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204(d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204(e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this FEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on DEIRs.

2. General Comments

This section summarizes those environmental issues that were raised by multiple commenters. General responses provide background information to augment the individual responses found in Chapter 3 of this FEIR.

2.1 TRANSPORTATION METRICS

SB 743 Background

SB 743 was signed into law on September 27, 2013. It amended the Public Resources Code and added Section 21099 to change the way transportation impacts are evaluated under the California Environmental Quality Act (CEQA). Traditionally, transportation impacts have been evaluated using a threshold based on auto delay or level of service standard. The level of service standard evaluates a driver's experience at an intersection or roadway segment. The focus on auto delay often leads to mitigation measures that increase roadway capacity, which may lead to increased vehicle trips and vehicle miles traveled (VMT). The purpose of SB 743 is to focus transportation analysis away from driver delay to reduction of greenhouse gas emissions (GHG), creation of multimodal networks, and promotion of a mix of land uses. A reduction in VMT results in a reduction in GHG emissions.

SB 743 requires the Governor's Office of Planning and Research (OPR) to identify alternative transportation metrics that "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." Pursuant to new Public Resources Code Section 21099(b)(1), measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." OPR is in the process of reviewing comments received on their "preliminary discussion draft of changes to the CEQA Guidelines." Once the new CEQA Guidelines are finalized, new Public Resources Code Section 21099(b)(2) prohibits a finding that automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, is a significant impact on the environment pursuant to CEQA (unless otherwise provided for in the new Guidelines).

City Adopted Transportation Performance Measures

On November 3, 2014, the City of Pasadena City Council adopted a resolution to replace the City's transportation performance measures with five new Transportation Performance Measures and new thresholds of significance to determine transportation and traffic impacts under CEQA. The new performance measures and CEQA thresholds are consistent with the adopted and proposed General Plan and SB 743, and include VMT per capita, vehicle trips (VT) per capita, proximity and quality of bicycle network, proximity and quality of transit network, and pedestrian accessibility.

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The CEQA Guidelines encourage lead agencies to adopt thresholds of significance to determine the impact of an environmental effect within its jurisdiction. Significance thresholds quantify impacts on a qualitative, quantitative, or performance level basis. CEQA Guidelines Section 15064.7(b) lays out the process for adopting thresholds. The lead agency must adopt environmental thresholds of significance by ordinance, resolution, rule, or regulation through a public review process supported by substantial evidence.

In 2014, the City conducted numerous public hearings with the Transportation Advisory Commission, Planning Commission, and City Council to evaluate and develop new transportation performance measures. Pasadena's Department of Transportation presented substantial evidence to the public and decision makers to make an informed decision on the new performance standards. Substantial evidence included but was not limited to: presentations on SB 743 requirements; how new metrics would be better aligned with the vision, goals, and policies of the General Plan; how new metrics would better assess the transportation network and the resident experience; an analysis of several possible metrics and what they evaluate; the pros and cons of the existing and new metrics; and numerous case studies. The following public hearings were held:

Public Hearing on Draft Transportation Performance Measures

- Transportation Advisory Commission (February and March 2014)
- Municipal Services Committee (March 2014)
- Community Meeting (March 2014)
- Planning Commission (April 2014)

Public Hearing on Proposed Transportation Performance Measures

- Transportation Advisory Commission (May, June, and September 2014)
- Planning Commission (May, June, July, and September 2014)
- Community Meetings (June 2014)
- Municipal Services Committee (July and October 2014)
- City Council (November 2014 to adopt new transportation performance measures and CEQA thresholds of significance)

Based on substantial evidence and numerous public hearings, the City Council adopted a resolution establishing new thresholds of significance to determine transportation and traffic impacts under CEQA. City Council determined that the new transportation performance measures and CEQA thresholds are better aligned with the City's General Plan goals and policies and State regulations to create more sustainable transportation systems. They are also better suited to Pasadena's existing urban, walkable environment, since traditional performance measures (e.g. LOS) often require mitigation that increases roadway width that often cannot be constructed without adversely affecting existing buildings and the pedestrian environment. The performance measures and CEQA thresholds provide a holistic approach by considering the City's transportation network, including all modes of travel. This approach provides a more comprehensive systems approach that is independent and distinct from traditional traffic thresholds measuring level of service.

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Transportation Analysis in the General Plan Update

A few of the commenters suggested that the EIR provide a transportation analysis using the City's old traffic metrics to compare and contrast that analysis with the adopted metrics. Such an approach is not required by CEQA, nor would it provide meaningful information for CEQA purposes, for the following reasons. First, CEQA requires that the EIR address environmental impacts based on adopted thresholds of significance. The traffic analysis prepared for the General Plan Update and Section 5.13 of the DEIR uses the City's adopted thresholds of significance. Since the old traffic metrics based on level of service are no longer applicable adopted thresholds, this analysis is not required in the EIR. Second, a comparison of an analysis using the adopted transportation performance measures and CEQA thresholds, and old performance measures would not provide any meaningful information because the metrics are measuring two completely different and competing performance criteria and policies. Generally, the new performance measures focus on reducing VMT to create more sustainable communities, reducing GHG emissions, and accommodating all modes of travel. In contrast, the old metrics measure auto delay at a particular intersection or street segment, focus on moving more cars quickly at the expense of other modes of travel, and often lead to mitigation that increases roadway capacity to accommodate new vehicle trips. Increased roadway capacity may result in increased VMT, energy consumption, and GHG emissions. Therefore, the old metrics are inconsistent with adopted thresholds, and more importantly, conflict with the overarching goals and policies of the General Plan. Finally, the new metrics bring the City in line with state law. As stated before, upon certification of the upcoming State CEQA Guidelines, a level of service (auto delay) traffic standard "shall not" be used to make a significance determination pursuant to Public Resources Code Section 21099(b)(2). In conclusion, the City Council of the City of Pasadena properly adopted the current CEQA thresholds of significance, thereby doing away with the old metrics as outdated and out of line with the City's General Plan and evolving state law, and there is no legal requirement or policy justification for a comparison between the new thresholds and the old metrics.¹

2.2 STATE DENSITY BONUS LAW

A number of comments were made that relate to the State's Density Bonus Law (SB 1818) and how it would impact the environment through implementation of the General Plan Update. This response is intended to provide background on SB 1818, how it can be applied, and how it was analyzed in the DEIR.

Background

The State of California enacted changes to the state's density bonus law, which went into effect on January 1, 2005. The legislation, SB 1818, amended Government Code Sections 65915-65918 to allow a density bonus, concessions or other incentives to development projects that meet certain affordable housing criteria without requiring a discretionary approval. Concessions or other incentives may include a waiver or reduction of

¹ Further, CEQA does not require that a lead agency include every study requested by the public, even if the further study might be helpful (which is not the case here). "[A] project opponent or reviewing court can always imagine some additional study or analysis that might provide helpful information. It is not for them to design the EIR. That further study ... might be helpful does not make it necessary." (*Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 581, quoting *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 415.)

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development standards where the standard would physically preclude construction of the project. Pasadena Municipal Code Chapter 17.43 implements Government Code Sections 65915-65918. The City shall grant the concession or incentive for a qualifying development, if it makes written findings, showing that the incentive: 1) is required to provide for affordable housing costs, 2) would not have a specific, adverse impact, upon health, safety or the physical environment for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact the project, 3) would not have a “specific adverse impact” on real property listed in the California Register of Historical Resources, and 4) would not be contrary to state or federal law. Pursuant to Municipal Code Section 17.43.060, the burden is on the applicant to demonstrate the need for the waiver or modification to a development standard.

Since the law was enacted, approximately 10 years ago, there have been a number of affordable housing units approved in the City of Pasadena. However, there have only been eight projects (one of which was superseded by a later application) which have received a density bonus and concessions under SB 1818. Of these projects, the majority of concessions were for minor changes to floor area ratios and setbacks. Of those, only three concessions have allowed for an increase in building height. The table below provides a summary of the projects that have been approved with concessions.

Table 2.2-1 Summary of Approved Density Bonus Concession Projects

Case Number	Address	Concession #1	Concession #2	Concession #3
AHCP #11586 (see AHCP #11751)	496 S. Arroyo Pkwy.	FAR Increase: from 1.5 to 2.2	-	-
AHCP #11573	123 S. Los Robles Ave.	FAR Increase: from 2.25 to 2.59	-	-
AHCP #11658	877 N. Orange Grove Blvd.	Commercial Depth Decrease: from 50'-0" to 30'-2"	Commercial Depth Decrease (corner): from 50'-0" to 30'-2"	Parking Decrease: From 14 to 7 spaces
AHCP #11751	496 S. Arroyo Pkwy.	FAR Increase: from 1.5 to 2.3	Height Averaging Increase: from 50'-0" to 57'-0"	-
AHCP #11753	105 S. Los Robles Ave.	FAR Increase: from 2.25 to 2.70	-	-
AHCP #11758	196-200 S. Oakland Ave.	Front Setback Decrease: from 26'-0" to 16'-0"	Corner Setback Decrease: from 15'-0" to 8'-0"	-
AHCP #11795	60-80 S. Vinedo Ave.	Height Increase (rear 40%): from 32'-0" to 36'-0"	-	-
AHCP #11817	104-112 E. Orange Grove Blvd.	Corner Setback Decrease: from 15'-0" to 5'-0"	Height Increase: From 36'-0" to 40'-6"	-

Source: City of Pasadena, July 2015

Comments were made that the City should assume a 35 percent density bonus in its buildout calculations, in accordance with the maximum that could be allowed by SB 1818. There is no support, however, in the City’s experience for such an assumption. The City reviewed historical trends since the inception of SB 1818 in 2005 to determine the number of affordable housing units that could be allowed over the development caps. Given the City’s experience over the past 10 years, with an average of a 17 percent density bonus per project, project buildout and the EIR analysis uses this average in addition to the development caps. An assumption

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of 35 percent would overstate reasonably foreseeable environmental effects of density bonus, and lead to mitigation or policies that have no nexus to project impacts based on facts. Further, it could end up discouraging the provision of affordable housing in Pasadena, and run counter to other General Plan goals and policies and the state legislative intent of SB 1818.

It is important to note that SB 1818 does not exempt future projects from CEQA. CEQA operates independently from SB 1818. Future site specific development projects will be subject to the applicable environmental review process pursuant to CEQA.

General Plan Update EIR is a Program EIR

The Pasadena General Plan Update EIR is a Program EIR (see Section 1.2.2 of the DEIR). A Program EIR analyzes the impacts of broad based policies and programs (such as general plans and specific plans) and contains a more general description of impacts, alternatives, and mitigation measures than a Project EIR. A Project EIR, on the other hand, analyzes a specific development project and therefore includes a greater level of detail and analyzes all phases of a project. A Program EIR is the most comprehensive tool to analyze impacts of Pasadena's General Plan Update because it considers citywide impacts, broad policy alternatives, and programmatic mitigation measures.

The General Plan Update does not propose a specific development project, therefore the Program EIR analyzes the impacts associated with total buildout of land uses in the City and goals and policies of the General Plan Update. While the EIR can be used for future tiering (see Section 2.7 of the DEIR), it is not meant to provide full clearance for all future site specific development projects within the City. Following adoption of the General Plan Update, the City will be updating the specific plans to be consistent with the General Plan Update, which will also require future CEQA review.

The DEIR analyzes the environmental impacts of all land uses within the City at buildout. As detailed in Section 3.3.2.1 of the DEIR and described above, General Plan Update buildout takes into account a reasonable, fact based assumption regarding the number of affordable units that may be built beyond the established development caps. The DEIR analyzes the total potential buildout of the City as well as the change in proposed land use throughout the City. However, at this programmatic level of analysis, it would be speculative to analyze the environmental impacts of a future development project that is seeking SB 1818 concessions. Over the past 10 years there have only been eight (one of which was superseded by a later application) approved development projects that have received SB 1818 concessions, three of which included a concession for building height. Of these projects, four (counting one project twice) were within the Central District Specific Plan, two were in Fair Oaks/Orange Grove Specific Plan, and one was in East Colorado Specific Plan.

The EIR Adequately Analyzes Aesthetic and Historic Resource Impacts Relative to SB 1818

Commenters have expressed concern that incentives or concessions obtained under SB 1818 may allow for exceedance of the maximum building height in areas adjacent to historic districts or historic buildings and that these exceedances may have potentially significant environmental effects. There are numerous historic resources throughout the City of Pasadena, and numerous federal, state and local regulations, including the

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National Historic Preservation Act and California Register of Historical Resources, operate to ensure that historic resources are protected. The EIR analyzed the change in land uses with respect to these resources in Section 5.1, *Aesthetics* and 5.4, *Cultural Resources*. For example, the aesthetic character of new land uses within the City and each specific plan area was provided starting on Page 5.1-42 of the DEIR. In addition, view simulations were generated for areas in the City where development has the potential to occur. For example, a conceptual sketch was provided at North Lake Avenue and Washington Boulevard near Bungalow Heaven in order to determine if changes in the aesthetic character would impact the surrounding area. The view simulations were not meant to be all inclusive or dictate a particular style or development type since the City cannot anticipate what individual projects will be proposed.

Projects seeking a density bonus under SB 1818 may obtain concessions or a waiver of development standards, including an increase in building height. The type of concession or waiver sought is dependent upon the number of affordable units being proposed, its location and parcel size, site constraints, and other uses proposed. These are unique circumstances that must be analyzed for a particular project and site to identify what concession or waiver of development standards would apply. Therefore, it would be unduly speculative to incorporate assumptions regarding concessions in the visual simulations.

Adjacency issues with respect to historic districts were also analyzed in Section 5.4.3 of the DEIR. Furthermore, a number of General Plan Update policies have been incorporated to ensure that new development is compatible with the character and scale of the surrounding neighborhood (see proposed Land Use Element policies 4.11, 4.12, 6.1, 6.2, 6.3, 6.4, 7.1, 7.3, 7.4, 8.1, 8.2, 8.3, 8.4, 8.5, and 22.1). In consideration of the City's adopted and proposed General Plan policies and programs protecting historic resources, including the Design Guidelines for Historic Districts, the adopted specific plans, and Municipal Code 17.61.030, impacts were determined to be less than significant.

Future projects seeking a density bonus under SB 1818 that are near or adjacent to historic resources and districts must comply with Government Code Section 65915. Specifically, concessions may be denied when it would result in a "specific adverse impact" (as defined in Government Code Section 65589.5) on the physical environment or on a property listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid that impact without rendering the project unaffordable to low and moderate income households. Additionally, the burden to justify a deviation from development standards is on the applicant to show the development would not be affordable without them. Further, based on the City's experience over the last 10 years with density bonus projects, there is no reasonable factual basis to support a conclusion that there will be such a large number of projects seeking concessions or incentives that potentially significant environmental impacts or "specific adverse impacts" with regard to historic or other resources will arise. Based on these requirements, no significant impacts beyond those analyzed in the EIR are anticipated.

2.3 AIR QUALITY

Introduction

Several comments expressed concern that the air quality analysis in the DEIR was not adequate because there is not a monitoring station adjacent to the I-210 Freeway in the City of Pasadena or that the DEIR did not

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include a provision to include one. While the provision for a new air monitoring station is not within the jurisdiction of the City of Pasadena, the implementation of the Pasadena General Plan Update does not preclude the South Coast Air Quality Management District (SCAQMD) from installing an additional air monitoring station within the City.

SCAQMD Air Monitoring

Air monitoring stations are not installed by SCAQMD on a site-by-site basis. Monitoring of particulate matter and other air pollutants monitoring stations throughout the SCAQMD do not distinguish between ambient concentrations generated by the freeways versus other stationary, area, and non-freeway sources of pollution. In addition, concentrations of air pollutants within the air basin are dispersed throughout the air basin according to regional meteorological conditions as described in Section 5.2, *Air Quality*, of the EIR (see pages 5.2-1 through 5.2-2). Air quality monitoring stations are selected by SCAQMD for their ability to monitor 'regional' air quality to comply with the Federal Clean Air Act (CAA) and the California CAA for attainment purposes. Hence, air monitoring sites are required to comply with CAA siting criteria and related requirements. As part of the CAA requirements, California is required to submit its annual monitoring network plan, which includes SCAQMD's network of air quality monitoring stations, to the Environmental Protection Agency (EPA).

SCAQMD currently operates 38 permanent, monitoring stations, and 4 single-pollutant source impact lead (Pb) air monitoring sites. One of these monitoring stations is already within Pasadena (752 S Wilson Avenue), approximately 1.3 miles from the I-210 Freeway. This air monitoring station operated by SCAQMD monitors carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), fine inhalable particulate matter (PM_{2.5}), and sulfate (SO₄). According to SCAQMD's air quality monitoring network plan, the existing site in Pasadena is selected to represent the air pollutant concentrations that a populated area is exposed to.

Air Quality Significance Thresholds

The conclusions of the air quality analysis in Section 5.2 of the DEIR can be made irrespective of ambient air quality in the South Coast Air Basin (SoCAB), which has been demonstrated to be in nonattainment under the State and National ambient air quality standards (AAQS) with or without the proposed project. Since the SoCAB is not currently in attainment of the AAQS, SCAQMD developed regional significance thresholds that take into account the incremental increase allowable on a project-by-project basis that would not be cumulatively considerable and would result in less than significant impacts. SCAQMD's bright-line significance thresholds were developed based on the annual emissions permitting thresholds in the EPA's Prevention of Significant Deterioration (PSD) of Air Quality regulation. The EPA thresholds are the increment of air pollution an area is allowed to increase. PSD increments prevent the air quality in clean areas from deteriorating to the level set by the National AAQS. Similar to CEQA thresholds, the EPA thresholds require projects that generate regulated sources of emissions to demonstrate that new emissions emitted from a proposed major stationary source or major modification, in conjunction with other applicable emissions increases and decreases from existing sources, will not cause or contribute to a violation of any applicable National AAQS or PSD increment. The thresholds used by air districts in California to determine significant impacts are derived from these health based AAQS. Therefore, the analysis of regional emissions impacts in the EIR addresses whether the additional amount of emissions generated by the project would be considered

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significant in the context of the existing cumulative effect, which is based on criteria air pollutant emissions for which the air basin is designated as nonattainment. The regional criteria air pollutant analysis in a CEQA document provides a cumulative impact analysis. The DEIR identified significant and unavoidable adverse impacts related to construction and operation of the General Plan Update.

Mitigation of Air Quality Impacts

To the extent there was a suggestion that placement of an air monitoring station would reduce criteria air pollutant or GHG emissions, it would not, and would not substantially reduce impacts. Per Section 15126.2(b) of the CEQA Guidelines, “significant and unavoidable” impacts are those that cannot be avoided or reduced to a level that is less than significant, even after incorporation of feasible mitigation measures. The installation of additional air quality monitoring stations in Pasadena could benefit future analysis of local air quality by providing additional data on ambient conditions and local effects of freeway pollutants to sensitive receptors. However, this information, alone, would not reduce impacts. Most of the significant and unavoidable air quality impacts of the proposed project are those related to the overall air basin’s nonattainment of pollutant thresholds. The State and regional air districts have established a number of rules and regulations that reduce emissions within the basin, such as motor vehicle standards and building efficiency standards (see DEIR Section 5.2.5). However, the existence of additional air quality data for specific locations in Pasadena would not have a tangible effect on the ability of projects to mitigate air quality impacts to the South Coast Air Basin and would therefore not lead to reduction in the aforementioned impacts to less than “significant and unavoidable.”

The DEIR included several provisions aimed at the mitigation of potential air quality impacts disclosed in the EIR. Most importantly, it identified four mitigation measures whose implementation would reduce the impacts of individual development projects on the health of Pasadena residents:

- **Measure 2.1:** Requires project applicants to prepare project-level technical assessments of construction-related air quality impacts and identify/implement measures that reduce construction-related pollutant emissions.
- **Measure 2.2:** Requires project applicants to prepare project-level technical assessments of operation-related air quality impacts and identify/implement measures that reduce operational pollutant emissions.
- **Measure 2.3:** Requires project applicants for projects that will generate substantial diesel truck traffic near sensitive land uses (e.g., homes, schools, hospitals) to prepare and submit a health risk assessment (HRA). Health hazards that exceed SCAQMD thresholds must be mitigated using best available control technologies for toxics (T-BACTs).
- **Measure 2.4:** Requires project applicants to prepare HRAs and implement site-specific design measures for sensitive land uses that would be placed in environments with high air quality health risks (as defined by state and SCAQMD regulations).

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Although these measures are not specifically tailored to freeway-related air pollution, they focus on “sensitive” land uses (which are often located near freeways) and add layers of public disclosure to the local development process.

In addition to identifying mitigation measures, the DEIR identified and analyzed a project alternative aimed at reducing air quality impacts generated by high-volume roadways: the Reduced Air Quality and Noise Impact Alternative. Although this alternative was found to reduce health risks to sensitive receptors, it did not eliminate the project’s significant and unavoidable air quality impacts, which are largely a function of the community’s size and overall population (with or without the proposed project). Furthermore, buildout of the Reduced Air Quality and Noise Impact Alternative was found to generate greater impacts than the proposed General Plan Update in several topical areas, including Greenhouse Gas Emissions, Hazards and Hazardous Materials, Public Services, Recreation, and Utilities and Service Systems.

Overall Air Quality Trends

Air pollution and overall air quality remain a major concern in the South Coast Air Basin and the region continues to experience some of the worst air quality in the nation. However, due to stricter emissions standards for power plants and automobiles, the basin has experienced multiple decades of overall reductions in hazardous air pollution. In the past two decades, ozone levels and fine particle pollution have dropped dramatically. The executive summary of SCAQMD’s 2015 Multiple Air Toxics Exposure Study (MATES-IV) in the South Coast Air Basin found that:

Compared to previous studies of air toxics in the Basin, this study found decreasing air toxics exposure, with the estimated Basin-wide population-weighted risk down by about 57% from the analysis done for the MATES III time period. The ambient air toxics data from the 10 fixed monitoring locations also demonstrated a similar reduction in air toxic levels and risks. (SCAQMD 2015)

Similarly, SCAQMD’s 2012 Air Quality Management Plan (AQMP) states that air quality in the basin has improved significantly in recent years and the number of days in which the basin exceeds federal standards have decreased dramatically (SCAQMD 2013). These accomplishments, which are largely the result of aggressive regulation, do not diminish the need for additional intervention at the local, state, and federal level. However, ongoing trends indicate that air quality in Pasadena and Southern California will most likely improve rather than worsen.

Along with emerging technologies in the automotive industry, the continued development of dense, walkable, transit-accessible neighborhoods (which reduce per-capita vehicle trips and trip lengths) is anticipated to reduce auto-related air pollutants in the air basin even as the region’s population grows. Furthermore, the land use pattern associated with the General Plan Update—which encourages the use of transit and non-motorized transportation—would contribute to the region’s decreasing reliance on the automobile, which has historically been a major source of air pollution. Therefore, although General Plan buildout may place new residents near freeways, impacts of this adjacency would be mitigated (see Measures 2-1 through 2-4, above). Although the magnitude and scale of growth allowed under the General Plan Update (or under the Adopted General Plan) would result in significant and unavoidable impacts, the resulting land use pattern would have a

2. General Comments

positive effect on regional air quality compared to equivalent growth at the region's sprawling, auto-centric edges.

3. Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency (City of Pasadena) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DEIR and prepare written responses. This section provides all written comments received on the DEIR and the City’s responses to all comments on environmental issues.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the DEIR are excerpted in this document, the sections are shown indented. Changes to the DEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the DEIR during the public review period.


Number Reference	Commenting Person/Agency	Date of Comment	Page No.
Agencies & Organizations			
A1	Bungalow Heaven Neighborhood Association	March 20, 2015	3-3
A2	CalTrans	March 23, 2105	3-33
A3	City of Pasadena Public Health Department	March 24, 2015	3-41
A4	County of Los Angeles Fire Department	February 3, 2015	3-47
A5	County of Los Angeles Fire Department	February 25, 2015	3-53
A6	Pasadena Chamber of Commerce	March 20, 2015	3-57
A7	Pasadena Heritage	March 23, 2015	3-61
A8	Playhouse District Association	March 24, 2015	3-75
Residents			
R1	Joyce Dillard	March 24, 2015	3-81
R2	Laura Ellersieck	January 28, 2015	3-85
R3	Alon Friedman	February 19, 2015	3-89
R4	Lonnee Hamilton	February 8, 2015	3-93
R5	Richard Hogge	February 10, 2015	3-99
R6	Richard Luczynski (1 of 2)	February 11, 2015	3-103
R7	Richard Luczynski (2 of 2)	March 24, 2015	3-109
R8	Steve Madison, Councilmember	March 12, 2015	3-113
R9	Bryant Mathews	March 8, 2015	3-117
R10	North Mentor Avenue Residents Group	March 23, 2015	3-121
Community Forums			
F1	Forum #1	February 19, 2015	3-131
F2	Forum #2	February 21, 2015	3-135
City Commissions			
C1	City Commissions - Consolidated	Multiple dates	3-141

3. Response to Comments

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
Errata (Section 5)			
-	Vince Farhat, At-Large Commissioner, City of Pasadena Planning Commission	March 15, 2015	
R11	Robert J. Tait, Ph.D, President, El Rio/Lake Neighborhood Association	February 25, 2015	

3. Response to Comments

LETTER A1 – Bungalow Heaven Neighborhood Association (13 pages)



BUNGALOW HEAVEN™ NEIGHBORHOOD ASSOCIATION

March 20, 2015

Vicrim Chima, Planner, General Plan Manager
Planning & Community Development Department
175 N. Garfield Avenue
Pasadena, CA, 91109

RECEIVED
MAR 23 2015
BY: *J. Chima*

Dear Mr. Chima:

Thank you for the opportunity to comment on the *Draft Environmental Impact Report (DEIR)*, *Draft Land Use Element*, and *Draft Mobility Element* for the *Pasadena General Plan Update* released for public review on January 22, 2015. This letter is being submitted on behalf of Bungalow Heaven Neighborhood Association (BHNA), a California Nonprofit Public Benefit Corporation. The purpose of BHNA is to improve and preserve the neighborhood known as Bungalow Heaven, to represent residents and property owners, to present collective positions on issues as they arise, and to provide a forum and vehicle for communication among property owners and residents.

BHNA has reviewed the DEIR, *Draft Land Use Element*, and *Draft Mobility Element*, and attended community workshops offered as part of the input process requested by the City of Pasadena. We have a number of concerns which we wish to share.

ENVIRONMENTAL HEALTH ISSUES

Related to issues of growth, land use and mobility is overall environmental health and quality of life. The City's Public Health Department's *2012 Quality of Life Index* defines quality of life as:

"Quality of life is not indicated solely by genetics or by individual behavior; rather, quality of life is strongly influenced by a person's overall environment. These environmental factors, such as living wage, access to quality health care, housing security, clean air and water, and open community recreational spaces, expand upon the traditional understanding of what constitutes well-being."

Because of the somewhat reductionist nature of CEQA documents, there is no overarching analysis of how the cumulative effects of the proposed *General Plan Update* will affect overall quality of life in Pasadena. There is also concern that there is a lack of quality data available to adequately understand air quality issues, particularly as the City considers its future growth. There is a lack of daily readings of the air quality basis that we actually encounter along the 210 Freeway corridor and in neighborhoods because there is only one air quality monitoring station located at California Institute of Technology (Caltech), 1.3 miles south of the 210 freeway. That information is supposed to tell us what level of air quality we breathe at the freeway, where we live, work and recreate. In the City's *2012 Quality of Life Index*, there is no mention of air quality monitoring being done by the City. Because of the lack of data specific to Pasadena, the report

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A1-1

A1-2

3. Response to Comments

and City analyses of this issue rely on State and regional data to inform us about our air quality. A chart in the *2012 Quality of Life Index* shows over 12% of Los Angeles County residents as having one of four select respiratory conditions including pediatric asthma, adult asthma, chronic bronchitis, and emphysema. The chart used in the study information was done in 2011 by the American Lung Association.

A1-2
cont'd

There is a need for better information regarding air quality to effectively guide decision making, and this should be proactively addressed in the *General Plan Update* and other City guidance documents. Unfortunately, it is not.

MOBILITY ISSUES

This section addresses our concerns on the Mobility Element in the areas of population/traffic growth, bicycle plan implementation, and proposed road diets/lane reductions.

Area Development and Vehicle Traffic Growth

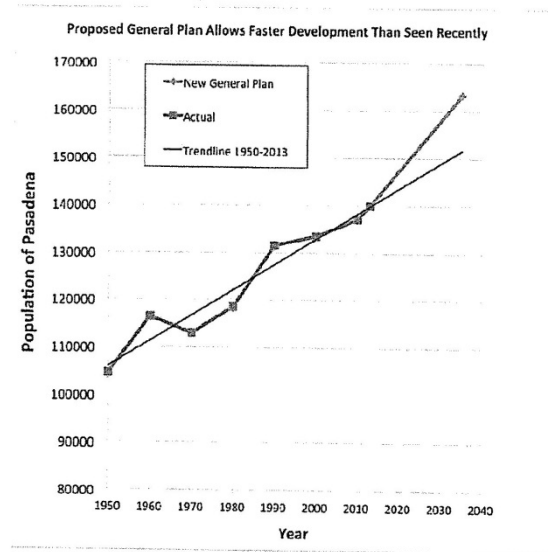
The proposed *General Plan Update* enables a very fast development pace for Pasadena. This is noted in the DEIR: the “plan would markedly increase the population” compared to existing conditions (DEIR page 5.10-13). This growth is well in excess of the Southern California Association of Governments (SCAG) estimates for Pasadena’s 2035 population (152,500 vs. 163,411 in the proposed *General Plan Update* – a difference of 10,911). The projected ~20% growth of Pasadena’s population is also out-of-line with the December 2014 California Department of Finance projection for Los Angeles County as a whole, estimated as a 9.6% increase from 2015 to 2035. The proposed development caps (9,955 units, not including additional affordable housing) are also far higher than necessary to satisfy Pasadena’s Regional Housing Needs Allocation (RHNA). For the period 2014-2021, Pasadena is required to provide 1,332 residential units.

A1-3

Despite the fact that the plan **markedly** overestimates increases in Pasadena’s population, the conclusions reached in DEIR Chapter 5 were that the plan does “not substantially exceed” SCAG’s growth forecast and that “the proposed project would result in a less than significant impact relating to population growth” (page 5.10-17). These conclusions are incorrect for those living in Pasadena.

A1-4

3. Response to Comments



The proposed *General Plan Update* allows growth that is far above what has recently occurred in Pasadena (see graph above). Some might argue that not all the allowed growth would actually occur by 2035. However, based on recent development pace, it seems quite possible that full buildout will occur by that time. The proposed caps allow 9,955 residence units to be built by 2035. With affordable housing units, this number increases to around 12,000. According to Table 5.10-1 in Chapter 5 of the DEIR, the number of dwelling units in Pasadena increased by 5,419 between 2000 and 2010. If that pace continues, complete buildout seems likely, particularly since the new plan is more growth-friendly than the existing *General Plan*.

A1-5

Also, in a few ways, the situation is a bit worse than it appears. Land Use Policy 1.4, Transfer of Development Capacities, allows for the conversion of residential units and commercial square feet in the specific plan areas. Therefore, even the generous development caps listed are not hard caps at all. Second, parking requirements, which are in practice a barrier to development in many cases, could be eased in the future. This conclusion is based on several Land Use Policies: Policy 19.1 Parking Standards, Policy 19.2 Parking Limits, and Policy 19.6 Unbundled Parking (on pg. 21 of the Draft Land Use Element).

A1-6

The impact of growth is masked in the DEIR. As a clear example of this, consider Chapter 7, Section 4 of the DEIR, where the old general plan ("No Project"; buildout population 153,463) is compared to the new plan (buildout population 163,411). In the conclusion of this section (Section 7.4.15, page 7-15), it is claimed that the old plan (relative to the new plan) would result in "an increase in impacts to air quality, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, and transportation and traffic." This defies common sense. Adding 10,000 more additional residents (as well as 3,000 additional employment) would *decrease* GHG emissions and traffic?

A1-7

3. Response to Comments

How can the DEIR reach this upside-down conclusion? This depends on two things:

- (1) A drastic change in the way transportation impacts are measured (approved unanimously by City Council on Nov. 3, 2014; an eloquent statement of the problem with this change was given by Vince Farhat, a Pasadena Planning Commissioner, in a memorandum dated July 17, 2014; among other things, he makes the case that the VMT and VT Per Capita metrics are illusory), and
- (2) A highly suspect number in the traffic analysis report – specifically, the value 7,004,912 listed for VMT (vehicle miles travelled) for Scenario 2 (No Project/Existing General Plan) given in Table 9 of the Traffic Analysis Report (page I-30). This value is less than the one for the new plan (6,963,476) despite the new plan’s greater population and employment. The 7,004,912 value may be the result of a bad model, an incorrect use of the model, or a transcription error, but there are insufficient details to investigate this further. One reason to suspect that this value is mistaken is that Scenario 2 should have a VMT per capita somewhere between the existing 2014 conditions (22.6 miles per capita) and the new plan (22.1 miles per capita), not the higher value they claim (23.2 miles per capita). The argument is that, in most respects, the buildout of the old plan is essentially an intermediate state between present conditions (2014) and the buildout of the new plan. The VMT for the buildout of the existing *General Plan* should not be worse than both the present conditions and proposed *General Plan Update* build out in VMT per capita. The old plan should still benefit from the higher density effect since its growth is also concentrated in the central district.

A1-8

A1-9

After examining the early public input to the *General Plan Update* (from 2009 to 2012, as documented on the City of Pasadena website), the current proposal is much more pro-development than the majority of Pasadena residents would desire. The proposed *General Plan Update* and environmental analyses do not appropriately or adequately address these concerns and issues.

A1-10

Bicycle Plan Implementation

Improving the bicycling experience on Wilson Avenue with a greenway/bicycle boulevard is a worthwhile goal. Some aspects of the Wilson Avenue plan as described in the *Bikeway Analysis and Feasibility Study*, which includes details of how to implement the greenway, seem very good – most notably the removal of parking on the west side of Wilson Avenue between Locust Street and Colorado Boulevard. However, the plan for installing traffic diverters at Wilson Avenue and Orange Grove Boulevard, blocking through traffic for northbound and southbound motor vehicles, is a questionable idea. The benefit to bicyclists would be minimal, while the disruption of traffic would be substantial. Traffic on Wilson Avenue above Villa Street is relatively light, and thus it is not much of a hindrance for bicyclists. The most challenging part of Wilson Avenue for bicyclists is the heavily travelled section between Del Mar Boulevard and the 210 Freeway – and especially the narrow section between Colorado Boulevard and Locust Street. The bicycle plan does address this by removing parking, which should help considerably.

A1-11

Wilson Avenue would be problematic as a bicycle corridor, as it has speed humps north of Orange Grove Boulevard, and the vertical/elevation profile of the intersection of Wilson Avenue/Villa Avenue is severe, with deep gutter treatments at the northeast corner. That intersection is also offset in the north/south direction. It is difficult to traverse on a bicycle while sharing the right-of-way with vehicles.

Traffic volumes already decrease greatly as Wilson Avenue transitions from the Colorado Boulevard corridor, the I-210 freeway overpass, and Villa Avenue. North of Orange Grove Boulevard, traffic volumes have another large decrease. Each major intersection on Wilson Avenue diverts traffic by travel patterns

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3. Response to Comments

away from the north and south direction. The proposed vehicle traffic diverters at the intersection of Wilson Avenue/Orange Grove Boulevard would not be necessary to reduce corridor vehicle volumes for the bicycle facility.

Based on our conversations with City Transportation staff at recent public outreach events, we understand that the greenway treatment on Wilson Avenue and its constituent elements were analyzed within the *Bikeway Analysis and Feasibility Study* of September 2014, but that these concepts would be reviewed by the public and local neighborhoods as project planning for this and other corridors continues. Our neighborhood will have concerns over the planned north/south vehicle diverters at Wilson Avenue/Orange Grove Boulevard and also at Wilson Avenue/Washington Boulevard. These diverters have the potential to increase neighborhood traffic on parallel north-south streets and these increases must be studied in detail if they are to be further considered. The diverters will also serve to block the Bungalow Heaven neighborhood from direct access to the Colorado Boulevard and other corridors south of the I-210 freeway, which is preferred by many residents rather than using Lake Avenue or Hill Avenue. The City of Pasadena should make sure that all local neighborhoods will be included in public meetings for these potential Wilson Avenue corridor improvements.

A1-11
cont'd

Road Diets and Bicycle Lanes

The City is considering three locations for “road diets” where roadway travel lanes are reduced and other amenities are added such as bicycle lanes. The focus of the DEIR Transportation and Traffic section is on three corridors: Washington Boulevard, Orange Grove Boulevard, and Cordova Street. These are identified in a bulleted list at the bottom of page 5.13-16 of the DEIR.

Within the northeast area of Pasadena, the Washington Boulevard project is targeted for the segment between Altadena Drive and Sierra Madre Boulevard, while the Orange Grove Boulevard project is targeted for the segment between Allen Avenue and Sierra Madre Villa Avenue. The map on Figure 5.13-4, however, does not appear to denote these projects. The Orange Grove Boulevard segment does not change in designation on this figure to the east of Allen Avenue. The Washington Boulevard designation is confusing as well.

A1-12

Furthermore, the categorization of facilities is confusing. The Level 2 category includes buffered bike lanes (requiring width for bicycle lane plus a physical or striped buffer area between the lane and traffic), bike lanes (requiring some width for the lanes), and bike boulevards. The last item, bike boulevards, might not require much roadway width for implementation. Vehicle and bicycle traffic usually operate in shared conditions on those facilities. The use of the three levels or categories should be reconsidered to use the standard Caltrans notation – Class I for bicycle paths, Class II for bicycle lanes, Class III for bicycle boulevards or signed routes, and Class IV for cycle tracks. The cycle track treatment is proposed for Union Street.

A1-13

Our neighborhood needs a better explanation of what is proposed for east-west bicycle facilities on Orange Grove and Washington Boulevard. Earlier bicycle plan proposals had new bicycle lanes proposed for Orange Grove and Washington Boulevard, within larger corridors either adjacent to or near to our neighborhood. The proposed *General Plan Update* appears to only provide for a minimal number of bicycle lane projects. This needs to be clarified.

A1-14

3. Response to Comments

LAND USE ISSUES

In our October 21, 2013 comment letter submitted to the City of Pasadena in response to the September 5, 2013 *Notice of Preparation and Initial Study*, BHNA identified a number of concerns related to proposed land use designations for the portion of North Lake Avenue that borders the western edge of Bungalow Heaven. Bungalow Heaven is a City-designated Landmark District, portions of which are also listed in the National Register of Historic Places and California Register of Historical Resources. Of specific concern were the proposed land use designations for North Lake Avenue between East Mountain Street and East Washington Boulevard. The proposed mixed-use, land use designations for the east side of North Lake Avenue between E. Mountain Street and E. Washington Boulevard could result in encroachment into and impairment of the historic integrity of the neighborhood as a district by altering the existing single-family residential character, particularly along North Mentor Avenue. The proposed land use designations for the relevant stretch of North Lake Avenue include (from south to north):

A1-15

- E. Mountain Street to E. Claremont Street: Low Mixed-Use (0.0-1.0 FAR)
- E. Claremont Street to E. Washington Boulevard : Medium Mixed-Use (0.0-2.25 FAR)

As highlighted in BHNA's October 10, 2013 letter, California density bonus law (Gov-Code §65915, also known as SB1818) could result in exemptions or waivers from local land use regulations that would otherwise protect the historic integrity of the neighborhood. Future mixed-use projects on North Lake Avenue that secure exceptions from regulations related to setbacks, height limits, and other local requirements could result in projects of a scale and character that could encroach upon and impact the historic integrity and character of Bungalow Heaven as an historic resource.

A1-16

As defined by the City of Pasadena, the Bungalow Heaven neighborhood is considered an historic resource based on city, state and federal designations. Bungalow Heaven was designated as the City's first Landmark District in 1989, "with the goal of preserving the unique historical and environmental qualities of a residential neighborhood in the City of Pasadena..." (City of Pasadena, Oct- 5, 1993: Bungalow Heaven Landmark District Conservation Plan). The plan describes the character as follows:

"While the majority of homes in Bungalow Heaven are Craftsman style bungalows, hence the name of the district, many fine residences of significant historic design, including Spanish Colonial Revival and Tudor Revival, populate the neighborhood. The neighborhood retains a distinct single-family quantity. The character of the district is enhanced by mature street trees and attractive landscaping, which are important elements of the overall streetscape."

A1-17

In addition to being a City-designated Landmark District, the neighborhood was listed in the National Register of Historic places as "Bungalow Heaven Historic District" in 2008, and was thus automatically listed in the California Register of Historical Resources. In the *National Register of Historic Places Registration Form*, the neighborhood's significance statement includes the following:

"...the historic district is significant in local history as the largest intact grouping of working class housing constructed during the late nineteenth and early twentieth centuries that reflects the influences of the Arts and Crafts movement in Pasadena. There are few such neighborhoods remaining in the city that retain their physical integrity to the same degree as the Bungalow Heaven Historic District."

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<p>As an historic residential district, a number of elements contribute to the historic single-family character of Bungalow Heaven. The broader landscape of the neighborhood, including its public spaces and streetscapes, as well as the visual connection to the neighborhood's surroundings, including views of the San Gabriel Mountains, all contribute to this character.</p>	<p>A1-17 cont'd</p>
<p>A number of City-adopted design guidelines support the protection of historic neighborhoods like Bungalow Heaven. However, the potential exceptions from local land use regulations for mixed-use projects that utilize California's density bonus law could make these guidelines moot. Of particular note are the goals for Bungalow Heaven identified in the <i>Design Guidelines for Historic Districts in the City of Pasadena, California-with the Secretary of the Interior's Standards for Historic Preservation</i> (April 2002):</p>	<p>A1-18</p>
<p style="padding-left: 40px;"><i>"The Bungalow Heaven Landmark District should continue to develop in a coordinated manner so that an overall sense of visual continuity is achieved. Preservation of the integrity of this area is a primary goal of the Historic Preservation Commission."</i></p>	
<p>While the City's design guidelines support the protection of Bungalow Heaven, the effects of housing density bonus laws could override these protections and impact the neighborhood should North Lake Avenue include mixed-use development.</p>	
<p>The following outlines BHNA's continuing concerns about this issue in response to the <i>Draft Land Use Element</i> and DEIR.</p>	
<p><u>Inconsistencies within the Draft Land Use Element</u></p>	
<p>The <i>Draft Land Use Element</i> fails to consider that some of the guiding principles and draft goals and policies may not be achievable on the portions of North Lake Avenue proposed for mixed-use designation, particularly where these proposed mixed-use designations are adjacent to single-family residential neighborhoods in landmark districts. The requirements of California density bonus law and the potential for associated waivers of development standards in mixed-use projects incorporating affordable housing could result in development that conflicts with the <i>Draft Land Use Element</i>. Single family residential landmark districts could be negatively affected.</p>	<p>A1-19</p>
<p>Inconsistent elements include:</p>	
<ul style="list-style-type: none"> • The <i>Draft Land Use Element</i> identifies a number of Guiding Principles, <i>"that cumulatively represent the community's vision for the future."</i> The first two guiding principles state (<u>underline below added for emphasis</u>): <ul style="list-style-type: none"> o <i>"Growth will be targeted to serve community needs and enhance the quality of life. <u>Higher density development will be directed away from residential neighborhoods and into the Central District, Transit Villages, and Neighborhood Villages. These areas will have a diverse housing stock, job opportunities, exciting districts with commercial and recreational uses, and transit</u></i> 	<p>A1-20</p>
<p>7</p>	

3. Response to Comments

opportunities. New development will build upon Pasadena's tradition of strong sense of place, great neighborhoods, gardens, plazas, parks, and trees.

- o Pasadena's historic resources will be preserved. Citywide, new development will be in harmony with and enhance Pasadena's unique character and sense of place. New construction that could affect the integrity of historic resources will be compatible with, and differentiated from, the existing resource."

The Draft Land Use Element fails to address the potential conflicts between these guiding principles cited above and mixed-use projects that obtain waivers associated with the California density bonus law.

- The Draft Land Use Element includes the following goals and policies that are in conflict with potential mixed-use on North Lake Avenue. They once again do not include provisions to address the potential conflicts between these goals and policies and mixed-use projects that obtain waivers associated with California density bonus law (**underline below added for emphasis**):

1.1. Basic Growth Policy. Accommodate growth that is consistent with community values and that complements the scale and character of Pasadena's unique residential neighborhoods, business districts, and open space.

1.1. Targeted Growth. Target growth and new construction in infill areas and away from Pasadena's residential neighborhoods and open spaces by redeveloping underutilized commercial and industrial properties, especially within the Central District, Transit Villages, Neighborhood Villages, and along selected corridors.

4.11 Development that is Compatible [Urban Form and Placemaking]. Require that development demonstrates a contextual relationship with neighboring structures and sites addressing such elements as building scale, massing, orientation, setbacks, buffering, the arrangement of shared and private open spaces, visibility, privacy, automobile and truck access, impacts of noise and lighting, landscape quality, infrastructure, and aesthetics.

4.12 Transitions in Scale [Urban Form and Placemaking]. Require that the scale and massing of new development in higher-density centers and corridors provide appropriate transitions in building height and bulk and are sensitive to the physical and visual character of adjoining lower-density neighborhoods.

GOAL 6. Character and Scale of Pasadena. A built environment that evolves while maintaining Pasadena's unique sense of place, character, and the urban fabric.

6.1 Sense of Place and History. Require new development and changes to existing development to be located and designed to respect the defining elements of Pasadena's character and history such as its grid street pattern, block scale, public realm, neighborhoods and districts, building massing and heights, significant architecture, and relationship to the mountains and Arroyo Seco.

6.2 Established Neighborhoods. Preserve, protect, and enhance established residential neighborhoods by providing sensitive transitions between these and adjoining areas. Require

A1-20
cont'd

3. Response to Comments

new development to respect and respond to the existing physical characteristics that contribute to the overall character and livability of the neighborhood.

7.3 Compatibility [Sense of Place]. Require that new and adaptively re-used buildings are designed to respect and complement the defining built form, massing, scale, modulation, and architectural detailing of their contextual setting.

GOAL 8. Historic Preservation. Preservation and enhancement of Pasadena’s cultural and historic buildings, landscapes, streets and districts as reminders of its past and a source of community identity, and social, ecological, and economic vitality.

8.1 Identify and Protect Historic Resources. Identify and protect historic resources that represent significant examples of the City’s history.

8.5 Scale and Character of New Construction in a Designated Landmark and Historic Districts. Promote an architecturally sensitive approach to new construction in Landmark and Historic districts. Demonstrate the proposed project’s contextual relationship with land uses and patterns, spatial organization, visual relationships, cultural and historic values, and relationships in height, massing, modulation, and materials.

21.3 Neighborhood Character [Residential Neighborhoods]. Maintain elements of residential streets that unify and enhance the character of the neighborhood, including parkways, street trees, and compatible setbacks.

GOAL 22. Single-Family Neighborhoods. Distinct and quality single-family residential neighborhoods distinguished by their identity, scale, and character.

25.4 Architecture and Site Design [Commercial Corridors and Districts]. Require that new development protect community character by providing architecture, landscaping, and urban design of equal or greater quality than existing and by respecting the architectural character and scale of adjacent buildings...

36.4 Neighborhood Compatibility [North Lake]. Require that the types of use and location, scale, and design of development buffer commercial and mixed-use development on Lake Avenue from adjoining lower density residential neighborhoods.

A1-20
cont'd

Draft Environmental Impact Report

The DEIR fails to adequately address the concerns outlined in the October 10, 2013 letter from BHNA.

A1-21

Objectives:

The proposed *Land Use Element* as it relates to Bungalow Heaven as outlined above does not meet several of the objectives of the General Plan Update. Specifically, the DEIR identifies the following objectives:

A1-22

“Objective 1: Provide a new Land Use Element that targets growth to serve community needs and enhance the quality of life. Direct higher density development away from residential neighborhoods and into the Central District, Transit Villages, and Neighborhood Villages.

3. Response to Comments

Objective 3: Ensure new development builds upon Pasadena's tradition of strong sense of place, great neighborhoods, gardens, plazas, parks, and trees.

Objective 4: Preserve Pasadena's historic resources by ensuring that new development is compatible with and differentiated from existing historic resources."

The proposed Land Use Element would site higher density, mixed-use development directly adjacent to Bungalow Heaven's single family residential neighborhood in conflict with Objective 1. This type of development is incompatible with the "strong sense of place" and "great neighborhood" that is characterized by Bungalow Heaven, and thus not consistent with Objective 3. With the potential for waivers from development standards for mixed-use project on North Lake Avenue, there is potential for new development that is not compatible with existing historic resources (Bungalow Heaven), and thus in conflict with Objective 4.

A1-22
cont'd

Environmental Analysis - Aesthetics:

This analysis identifies Bungalow Heaven as an "unique scenic resource." According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- AE-1 Have a substantial adverse effect on a scenic vista.
- AE-3 Substantially degrade the existing visual character or quality of the site and its surroundings.

The analysis of Impact 5.1-1 concludes that, "the proposed General Plan Update anticipates that most changes to the appearance and character of Pasadena will occur in its eight specific plan area" and that, "Most areas outside the specific plan areas are dominated by single-family residential neighborhoods, whose character and scale are protected by both existing City regulations and proposed policies in the General Plan Update." However, this analysis fails to consider and analyze the effects of waivers from development standards due to California density bonus law.

A1-23

Further, the visual simulation analysis fails to illustrate the visual appearance of mixed-use development along North Lake Avenue from East Mountain St. to East Washington Blvd. The analysis also states, "The introduction of this kind of infill development along Pasadena's arterial corridors would not create a substantial adverse change in the overall visual appearance of the neighborhood, especially because it would not affect single-family residential uses on surrounding streets. Furthermore, implementation of proposed Land Use Element Policies 4.11, 4.12, 6.2, and 36.4 would ensure that new commercial uses would be designed to be compatible with surrounding existing uses. Development consistent with the General Plan Update will improve the neighborhood character." However, this analysis and the proposed Land Use Element Policies cited fail to consider and analyze the effects of waivers from development standards due to California density bonus law.

The impact analysis of "Changes in Community Character by Specific Plan Area" identifies that, "implementation of Land Use Policy 36.4 would ensure that the visual character and quality of established residential neighborhoods to the east and west of North Lake Avenue would not be adversely affected by new mixed-use and commercial projects. The policy requires buffers to be created between new

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3. Response to Comments

<p><i>development and adjacent single-family residential homes.” However, this analysis and proposed land Use Policy 36.4 fail to consider and analyze the effects of waivers from development standards due to California density bonus law.</i></p>	<p>A1-23 cont'd</p>
<p>The conclusion in the DEIR is that <i>“Aesthetic impacts would be less than significant”</i> but this conclusion is based on incomplete information and inadequate impact analysis. As a result, there are no mitigation measures to address the potential impacts to Bungalow Heaven as an aesthetic resource.</p>	<p>A1-24</p>
<p><u><i>Environmental Analysis – Cultural Resources:</i></u></p>	
<p>In “Appendix E: Paleontological and Cultural Resources Report” of the DEIR, it is noted that, <i>“the proposed changes to Land Use Maps have potential to adversely impact Landmark Districts as follows...Bungalow Heaven Landmark District may be adversely impacted along Lake by proposed change to low commercial (Orange Grove to Mountain) and low mixed-use (Mountain to Washington). Bungalow Heaven National Register District has no changes proposed.”</i></p>	
<p>According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:</p>	
<ul style="list-style-type: none"> • <i>C-1 Cause a substantial adverse change in the significance of an historical resource pursuant to Section 15064.5.</i> 	<p>A1-25</p>
<p>The DEIR further states that:</p>	
<p><i>“a project has a significant impact on a historic resource if it ‘would result in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resources would be materially impaired’ (CEQA Guidelines Section 15064.5(b)(1)). Material impairment would occur if the project would result in demolition or material alteration of those physical characteristics that convey the resource’s historical significance (CEQA Guidelines Section 15064.5(b)(2)).”</i></p>	
<p>Bungalow Heaven is considered “historically significant” per CEQA Guidelines Section 15064.5 because the district meets the criteria for listing in the California Register of Historical Resources.</p>	
<p>The environmental analysis notes that, <i>“Although the scale and character of new development may affect an adjacent resource, the Land Use Element proposes goals and policies to protect and maintain historic properties and places. With regard to historic and landmark districts, proposed General Plan Policy LU 8.5 considers the scale and character of new construction in landmark and historic districts.”</i> However, Policy LU 8.5 does not address the effects of waivers from development standards due to California density bonus law. As such, the environmental impact analysis is inadequate and fails to disclose potential impacts to residential landmark districts such as Bungalow Heaven that are adjacent to areas proposed for mixed-use designation.</p>	<p>A1-26</p>
<p>Additionally, there is general concern that these impacts would have a domino effect that could adversely affect the neighborhood’s historic integrity east of North Mentor Avenue. There is a pattern common in historic neighborhoods that has been observed in Bungalow Heaven. When incompatible development affects a portion of the neighborhood’s single family historic character, the desirability of affected single</p>	<p>A1-27</p>

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family homes as historic properties is reduced. Often, these properties then become rentals or sold to new owners who are not as concerned about historic integrity of the property. This results in a decline in historically sensitive maintenance and alterations, which in turn then reduces the desirability of adjacent properties and creates pockets of properties that are not adequately maintained for historic integrity.

A1-27
cont'd

Alternatives:

CEQA requires that an EIR include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6).

A1-28

Because the environmental analysis fails to identify potential impacts to single family residential landmark districts adjacent to proposed mixed-use areas, the DEIR fails to identify and consider alternatives that would avoid or substantially lessen such significant effects of the General Plan Update.

CONCLUSION

BHNA has identified that the inclusion of mixed-use land use designations for N. Lake Avenue between E. Mountain Street and E. Washington Boulevard would result in impacts to Bungalow Heaven as an aesthetic and historic resource. As such, BHNA requests that the Draft Land Use Element change the proposed land use designation along North Lake Avenue between East Mountain Street and East Washington Boulevard to low density commercial use.

A1-29

Thank you for your consideration of our comments.

Sincerely,

Board of Directors of Bungalow Heaven Neighborhood Association and
General Plan Update Committee

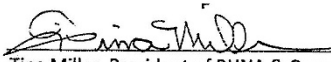
Cc: Mayor Bill Bogaard
Council Member Margaret McAustin
Council Member Victor Gordo
Margo Morales
Vannia DeLaCuba
Sue Mossman, Executive Director, Pasadena Heritage
Historic Highlands Neighborhood Association
Washington Square Neighborhood Association

Attachments:

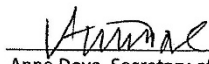
Board of Directors of BHNA and General Plan Update Committee Signature Page
April 2013 N. Mentor Residents Petition

3. Response to Comments

Dated: March 20, 2015

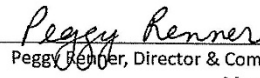

Tina Miller, President of BHNA & Committee Member


Scott Harden, Vice President of BHNA

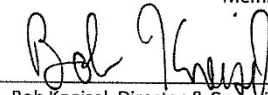

Anne Dove, Secretary of BHNA & Committee


Cindy Rice, Treasurer of BHNA

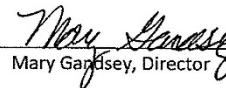

Garth Garrett, Director & Committee Member


Peggy Renner, Director & Committee Member

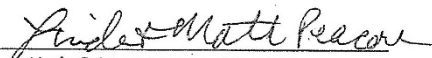

Bo Thoreen, Director & Committee Member


Bob Kneisel, Director & Committee Member

ABSENT - UNABLE TO SIGN
Andrea & Mike Townsend, Directors

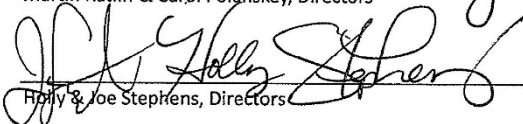

Mary Gansley, Director


Nicole Dowling, Director


Linda & Matt Peacore, Directors


Martin Ratliff & Carol Polanskey, Directors

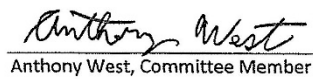

Monique Welland, Director


Holly & Joe Stephens, Directors


Tim Holdener, Director


Brian Marchetti, Committee Member


Richard Luczynski, Committee Member


Anthony West, Committee Member

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3. Response to Comments

A1. Response to Comments from Bungalow Heaven Neighborhood Association, dated March 20, 2015.

A1-1 This comment describes the purpose and mission of the Bungalow Heaven Neighborhood Association and provides comments on the General Plan Update DEIR, Draft Land Use Element, and Draft Mobility Element. Specific comments and concerns are addressed below.

A1-2 Please refer to Section 2.3, *Air Quality*. The EIR focuses on the potential direct and indirect physical impacts of the General Plan Update on the environment. The California Environmental Quality Act (CEQA) does not require a quality of life analysis. In addition, social and economic effects shall not be considered “significant effects on the environment” for purposes of the EIR (CEQA Guidelines §15131). However, the City may take these considerations into account when deciding on adoption of the General Plan Update.

Section 5.2 of the EIR analyzed the air quality impacts of the General Plan Update. Air pollutants of concern and associated health effects are provided in Section 5.2.1.2 of the EIR. The City is within the South Coast Air Basin and is subject to the rules and regulations imposed by the South Coast Air Quality Management District (SCAQMD). The project was analyzed with respect to SCAQMD guidelines and thresholds. As a function of the CEQA air quality analysis methodology established by SCAQMD, additional air quality monitoring would not affect the analysis conducted or conclusions reached in this EIR. It was determined that buildout of the General Plan Update would exceed SCAQMD thresholds and would result in significant unavoidable effects from construction and long-term operational emissions.

The EIR also provided the existing levels of ambient air quality in Table 5.2-3. Data was collected from two monitoring stations, including one in Pasadena located approximately 1.3 miles from the I-210 Freeway. There are also several air monitoring stations along the freeway in the South Coast Air Basin. SCAQMD is responsible for citing and relocating air monitoring stations and are required to conduct an annual review of the air quality monitoring network. Placement of a new air quality station would not result in any new significant impacts for purposes of the EIR. However, the City is willing to cooperate in locating a new air quality monitoring site within the City for informational purposes. Refer also to Section 2.3, *Air Quality*.

A1-3 The commenter states that General Plan buildout would result in new residents that would exceed the population growth projected for Pasadena by the Southern California Association of Governments (SCAG). Under CEQA, a Program EIR must analyze the environmental effects of “buildout” of a specific plan or general plan, which represents the maximum allowable development intensity of all affected parcels as established by zoning or development caps. The City of Pasadena calculated buildout using

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development caps and the total number of affordable housing units expected to be constructed. This is a conservative analysis of buildout potential because it does not factor in market demand, individual site constraints, or more restrictive development standards. Combined, these factors are expected to limit development potential below what is contemplated in the analysis. While the capacity generated in each of the specific plan areas and citywide exceeds growth forecasts, the General Plan Update accommodates SCAG and Department of Finance (DOF) projections for the City while providing flexibility as to where this growth can be accommodated. Population growth in Pasadena under the General Plan Update would likely be much closer to the Department of Finance (DOF) and SCAG projections for the City than under a theoretical buildout scenario.

Furthermore, SCAG growth forecasts are benchmarks calculated using overall demographic trends and growth patterns available at the time of their publication; they do not consider local infrastructure planning, changes in household size or land values, or other factors that allow a planning document generated for a more specific geographic area—such as the General Plan Update—to consider. Some such factors change substantially after publication of SCAG growth projections. As cities update their General Plans, they may adjust their own projections related to housing units, population, and employment based on demographic trends, housing needs, and employment growth occurring in the local community. Such adjustments are then coordinated with SCAG as they prepare their next round of city-level growth projections. Development caps that allow modest increases or decreases in growth compared to SCAG projections are not fundamentally in conflict with regional planning processes. Furthermore, the City’s proposed net increase of 12,312 dwelling units is consistent and slightly less than historical trends that show an increase in approximately 5,400 over a ten year period from 2000 to 2010 (see Table 5.10-1 in the DEIR).

Additionally, as the commenter correctly indicates, the General Plan Update has the potential to provide affordable units well in excess of its Regional Housing Needs Assessment (RHNA) target of 1,332 units for the 2014–2021 period. However, the City’s RHNA target is based on the affordability needs of certain economic segments of the population. The RHNA is an estimation of a jurisdiction’s housing need for a specific period of time, which uses a different horizon year than General Plan buildout. As discussed in Section 5.10.3, *Population and Housing*, of the DEIR, the EIR analyzed growth with respect to balancing jobs and housing in the City and the region and determined that impacts related to population growth would be less than significant. Refer also to response to Comment A1-4.

- A1-4 The EIR analysis is required to analyze buildout of the General Plan. Buildout includes development allowed by the development caps for each specific plan area, development allowed in areas outside of the specific plans, and buildout of projects approved but not

3. Response to Comments

yet built. In addition, the City added additional units to account for affordable units that may be developed based on historical trends.

See response to Comment A1-3. Although the EIR is required to analyze buildout, actual development is based on various development constraints including but not limited to market demand at the time of development, lot configuration, environmental constraints, more restrictive development standards, parking limitations, among other factors. Therefore, actual growth is anticipated to be less than what was assumed for buildout.

However, even assuming the worst case growth analyzed in the EIR, population increases would not result in a significant environmental impact. As discussed in Section 5.10.3, *Population and Housing*, of the DEIR, buildout of the General Plan Update accommodates the growth projected for the San Gabriel Valley region. As stated, buildout would result in an increase of 27,473 residents. Although this exceeds population projections for the City, it is within the overall growth assumed in the San Gabriel Valley. Accommodating regional growth within Pasadena's specific plan areas is supportive of State legislation (AB 32, SB 375, and SB 743) and SCAG's 2012 Regional Transportation Plan/Sustainable Communities Strategy which aims to place residents near employment centers and transit areas. The General Plan Update places higher density development and mixed use opportunities along major transportation corridors, near transit and employment centers. Furthermore, population growth would provide a more balanced jobs and housing ratio for the region. The environmental impacts of growth in the City are adequately evaluated throughout the DEIR.

A1-5 The commenter states that the General Plan Update allows more growth than current trends and is more growth friendly than the existing General Plan. This comment is noted and will be provided to the decision-making body as part of the consideration of the General Plan Update adoption, as this is not a comment on the adequacy of the environmental analysis.

A1-6 Although Policy 1.4 allows transfer of development capacity, it does not allow exceedance of development caps. If a project transfers development capacity in the form of residential units to another site, that transfer is subject to the development caps and respective Specific Plan requirements and would not be permitted if the caps were to be exceeded.

The General Plan Update is not proposing to relax parking requirements and cannot tie the hands of future legislative action as a matter of law. The parking goals and policies in the proposed Land Use Element are intended to support walkability, healthy and sustainable communities, transit support, and protection of residential neighborhoods, among other goals. These policies will not result in an exceedance of development caps. Further, this is not a comment on the adequacy of the environmental analysis.

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A1-7 The EIR does not mask the environmental impacts of growth associated with the General Plan Update. A comparison of the adopted general plan with the General Plan Update (Preferred Project) was provided as an alternative in Section 7.4 of the EIR, as required by CEQA. The primary source of greenhouse gas (GHG) emissions from project buildout is due to transportation emissions. Mobile source GHG emissions are based on vehicle miles traveled (VMT). Although the no project alternative would result in a reduction in overall building intensity, it would result in an increase in overall VMT as modeled by Fehr & Peers in the Traffic Analysis Report for the General Plan Update (see Appendix I of the EIR).

VMT is a measure of the total distance traveled by automobile, reflecting both the number of auto trips and the length of each auto trip made. Trip length is dependent on a number of factors that are included in the travel demand model, including but not limited to proximity of homes to job generating land uses, proximity to transit centers, socio-economic characteristics, and provision of multimodal transportation infrastructure. The proposed land use diagram and mobility element were developed to allow growth while reducing trip length and overall VMT.

The travel demand model was used to assess the interaction between land uses and the resulting automobile trips. The results of VMT Per Capita and VT Per Capita analysis, presented in the transportation section of the DEIR, were computed using the City of Pasadena's Citywide Travel Demand Model with different land use inputs for each scenario. This model has been calibrated and validated to Caltrans Travel Forecasting Guidelines and exceeded all of the validation standards, resulting in a locally valid model for Pasadena. Travel demand model documentation for the Pasadena model was included in the DEIR appendix.

Additionally, the VMT Per Capita, VT Per Capita CEQA, Bicycle, Pedestrian and Transit metrics and thresholds were adopted by City Council on November 3, 2014. Because these transportation and traffic thresholds are expressed per unit of population and employment, it is reasonable for an increase in residents and employment to result in decreased per-capita values.

Impacts related to hazards and hazardous materials, hydrology and water quality, land use and planning, and population and housing would be similar to the project but slightly greater due to the reasons set forth in Sections 7.4.6, 7.4.7, 7.4.8, and 7.4.10, respectively.

A comparison of air quality impacts are analyzed in Section 7.4.2 of the EIR. As discussed, the No Project/Adopted General Plan Alternative would result in a reduction of air quality emissions from construction and operation emissions. The summary provided in 7.4.15, *Conclusion* and Table 7-19 of the EIR was incorrect. These typographical errors have been corrected as follows:

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Section 7.4.15, *Conclusion*, 1st paragraph (Page 7-15 of the DEIR):

The No Project/Adopted General Plan Alternative would have similar impacts for aesthetics, biological resources, cultural resources, and noise. Impacts would be reduced for air quality, public services, recreation, and utilities and service systems. This alternative would result in an increase in impacts to ~~air quality~~, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, and transportation and traffic. Significant unavoidable adverse impacts identified by the proposed project for air quality, GHG emissions, and noise would not be eliminated. Although this alternative would eliminate the CMP arterial intersection impact at Pasadena Avenue and California Boulevard, it would create a new significant impact at Rosemead Boulevard and Foothill Boulevard. This alternative would also create a new significant impact by increasing VMT per capita over existing.

Table 7-19 on page 7-39 of the DEIR:

Table 7-19 Comparison of Alternatives to the Proposed Project

Environmental Resource Area	Project	No Project/Adopted General Plan Alternative	Central District, South Fair Oaks, and Lincoln Avenue Alternative	Efficient Transportation Alternative	Reduced Air Quality and Noise Impact Alternative
Aesthetics	LTS	0	0	0	0
Air Quality	S/U	+ ₂	-	-	-
Biological Resources	LTSM	0	0	0	0
Cultural Resources	LTSM	0	-	0	0
GHG	S/U	+	-	-	+
Hazards and Hazardous Materials	LTS	+	-	0	+
Hydrology and Water Quality	LTS	+	0	0	0
Land Use and Planning	LTS	+	0	0	-
Noise	S/U	-	-	-	0
Population and Housing	LTS	+	0	0	0
Public Services	LTS	-	-	-	+
Recreation	LTS	-	-	-	+
Transportation and Traffic	S/U	+ ¹	0	0	- ²
Utilities and Service Systems	LTS	-	-	-	+

LTS – Less Than Significant

LTSM – Less Than Significant with Mitigation

S/U – Significant and Unavoidable

(+) = Impact considered greater when compared with the proposed project.

(0) = Impact considered neutral when compared with the proposed project.

(-) = Impact considered less when compared with the proposed project.

¹ The No Project/Adopted General Plan Alternative eliminates one significant unavoidable CMP arterial intersection impact at Pasadena Avenue and California Boulevard. However, it would create a new significant unavoidable CMP impact at Rosemead Boulevard and Foothill Boulevard and a new significant impact by increasing VMT per capita over existing.

² The Reduced Air Quality and Noise Impact Alternative eliminates one significant unavoidable CMP arterial intersection at Pasadena Avenue and California Boulevard. However, like the proposed project this alternative would result in the following significant CMP impacts: a significant impact on I-210 w/o Rte 134/710 in the PM peak hour for westbound lanes and on I-210 w/o Rosemead Boulevard in the AM peak hour for westbound lanes.

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- A1-8 Refer to Section 2.1, *Transportation Metrics*. Further, the City must abide by the thresholds of significance approved by the Council and based on the evidence presented by staff throughout the required public review process.
- A1-9 Refer to response to Comment A1-7. Although the vehicle miles traveled (VMT) result calculated for the proposed General Plan Update is approximately 0.6 percent less than the VMT result for No Project/Adopted General Plan Alternative, the number of vehicle trips (VT) for the proposed General Plan Update is approximately 1.3 percent greater. The larger population and employment of the proposed General Plan Update would generate more vehicle trips than the No Project/Adopted General Plan, but because more trips can be accomplished within closer proximity, the average trip length for the proposed General Plan Update would be shorter, resulting in fewer total VMT. No Project/Adopted General Plan is not an intermediate state between present conditions (2014) and the buildout of General Plan Update because the proposed General Plan Update represents a different mix, intensity, and spatial distribution of land uses from No Project/Adopted General Plan.
- A1-10 The commenter states that the proposed land uses are more pro-development than the majority of Pasadena residents prefer. This comment relates to the land uses, mobility improvements, and policies proposed by the General Plan Update, not the potential environmental impacts of the project. However, the comment is noted and will be provided to the advisory and decision-making bodies as part of the consideration of the General Plan Update adoption.
- A1-11 The City prepared a Draft Bicycle Transportation Action Plan in April 2015, which is anticipated to be adopted following approval of the General Plan Update. The City appreciates the commenter's observations and input related to improving the bicycle experience on Wilson Avenue. Specific treatments to manage vehicle speeds and volumes on Wilson have not yet been determined and will be the result of significant community input. The comment is noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.
- A1-12 The road diets and addition of bicycle lanes on Washington Boulevard, Orange Grove Boulevard, and Cordova Street are not inconsistent with the bikeway classifications presented on Figure 5.13-4. The commenter is correct that Figure 5.13-4 does not include a bicycle lane on Washington Boulevard between Altadena Drive and Sierra Madre Boulevard. Per the commenter's request, Figure 5.13-4, *Future Bicycle Network* has been revised to reflect this segment (shown below). Please note that this segment was not included in the Proximity and Quality of Bicycle Network calculations. However, adding this segment of Washington Boulevard would improve the value of the metric for all future scenarios and no new impacts would occur. This figure already includes

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Orange Grove Boulevard between Allen Avenue and Sierra Madre Villa Avenue as a Level 2 Facility, a category that includes Buffered Bike Lanes, Bike Lanes, and Bike Boulevards.

- A1-13 The commenter states that the categorization of facilities is confusing and should reconsider the use of standard Caltrans notation (i.e. Class I, Class II, etc). The focus of the proposed categories is to characterize the comfort of the facility for bicyclists, which provides a measure of the quality of the facility for bicyclists. For purposes of the Proximity and Quality of Bicycle Network metric, bicycle facilities are categorized according to the quality of the bicycling environment that they afford people riding bicycles. Bike Paths, Multipurpose Paths, and Cycle Tracks or Protected Bike Lanes are assigned to Level 1 because they offer more protection and amenities to people riding bicycles than Level 2 or Level 3 facilities do. Buffered Bike Lanes, Bike Lanes, and Bike Boulevards are assigned to Level 2 because they provide less separation from traffic than the Level 1 facilities do, but provide a higher-quality bicycling environment than Level 3 facilities (Bike Routes, Enhanced Bike Routes, and Emphasized Bikeways).
- A1-14 The commenter is requesting additional information on the City's plans for east-west bicycle facilities along Orange Grove Boulevard and Washington Boulevard. The proposed General Plan Update includes buffered bike lanes on Orange Grove Boulevard from Sierra Madre Boulevard to the south city limits. To accommodate a buffered bike lane in each direction of Orange Grove Boulevard, a road diet (removal of one vehicle travel lane in each direction) would be implemented along this stretch of Orange Grove Boulevard. The General Plan Update also includes buffered bike lanes on Washington Boulevard between El Molino Avenue and Forest Avenue. To accommodate a buffered bike lane in each direction along this portion of Washington Boulevard a road diet (removal of one vehicle travel lane in each direction) would be implemented along this stretch of Orange Grove Boulevard. See also response to Comment A1-12.
- A1-15 The evaluation of aesthetic and historic resources impacts related to land uses changes adjacent to Bungalow Heaven was provided in Sections 5.1 .3 and 5.4.3 of the DEIR. For example, Page 5.1-44 of Section 5.1.3 discusses how development capacity in the North Lake Specific Plan Area—which is adjacent to Bungalow Heaven—would allow redevelopment in the corridor but at a scale that would not drastically change the neighborhood's character, overall appearance, or views of the San Gabriel Mountains. Proposed Land Use Element Policies 4.11, 4.12, 6.2, and 36.4 would ensure that new projects along North Lake Avenue would be designed to be context sensitive. In particular, Land Use Policy 36.4 would require project applicants to design their projects to respond to the character of adjoining lower density residential neighborhoods.

Section 5.4.3 of the DEIR discloses that there would be potential redevelopment near the Bungalow Heaven Landmark District, but also that existing City procedures and proposed Land Use policies would minimize any visual effects on existing historic

3. Response to Comments

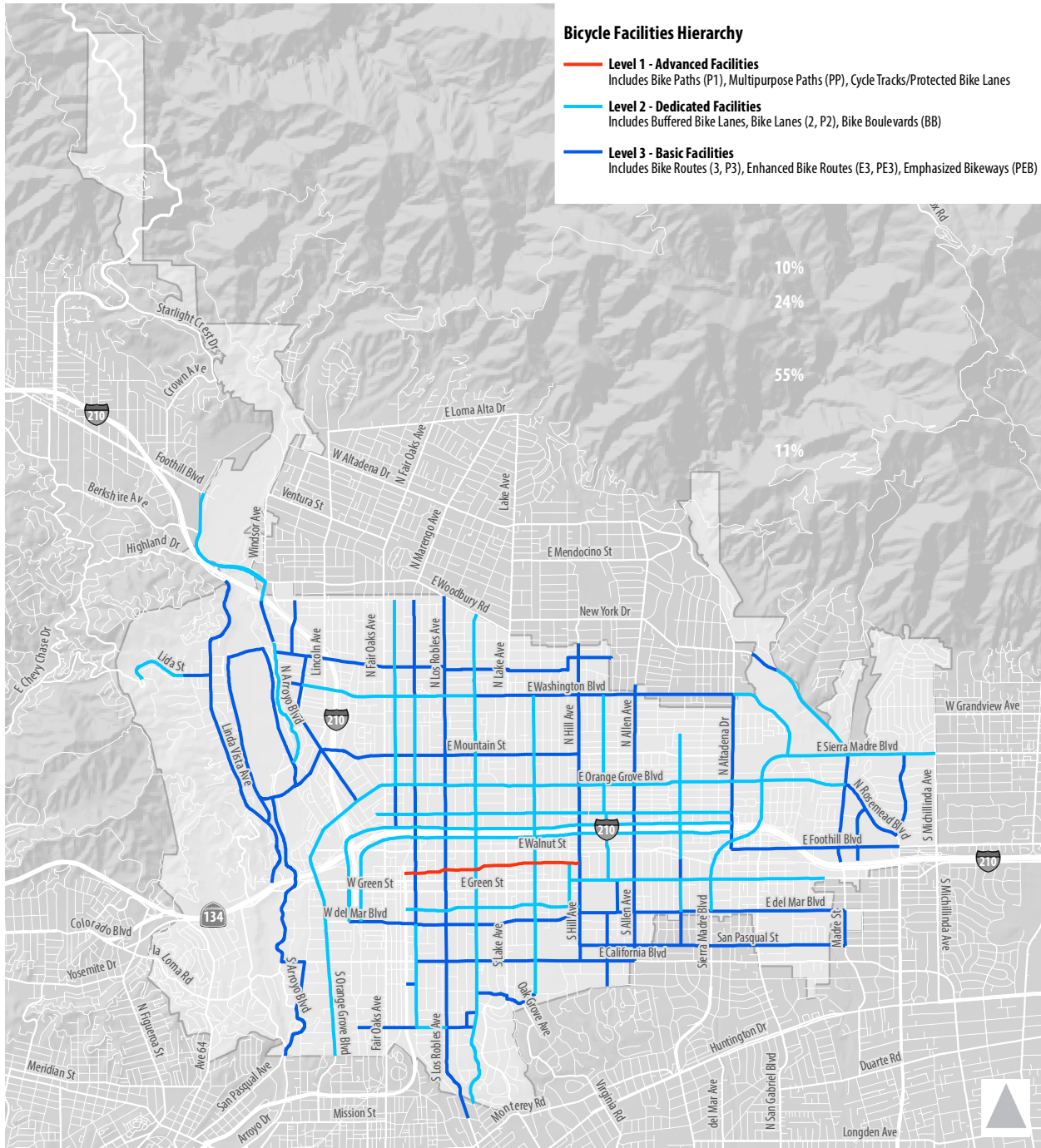
resources. In addition to the aforementioned policy regarding compatibility between new projects and adjacent low density residential neighborhoods (Policy 36.4), implementation of Land Use Policy 8.5 would ensure that new structures within landmark and historic districts also are designed to be context-sensitive. The policy requires project applicants to demonstrate that their project is sensitive to its contextual relationship with “land uses and patterns, spatial organization, visual relationships, cultural and historic values, and relationships in height, massing, modulation, and materials.” New development would be required to comply with the City’s Design Guidelines for Historic Districts and new projects in the North Lake corridor would be required to adhere to provisions of the North Lake Specific Plan, which address height, massing, and setbacks via design guidelines and development standards.

- A1-16 Refer to Section 2.2, *Density Bonus*. A significant impact to a historic district would result if the project would result in a substantial adverse change (physical demolition, destruction, relocation, or alteration) such that it would be materially impaired. An impact to a historic district would not occur unless it would destroy the district’s collective integrity. Therefore, even if a new development were constructed adjacent to a historic district or if development affected one element (or building) within a historic district, it would not result in a significant impact unless the project made the district ineligible for historic listing. As discussed in response to Comment A1-15 and DEIR Section 5.4.3, buildout of the General Plan Update in accordance with the proposed Land Use Diagram would not result in a significant impact to a historic district.
- A1-17 The City agrees with the commenter’s statement that Bungalow Heaven is a historic resource and Landmark District, as documented throughout the DEIR. No further response is necessary.
- A1-18 Impacts to historic resources are well defined in CEQA Guidelines Section 15064.5(b). A project has a significant impact on a historic resource if it “would result in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resources would be materially impaired” (CEQA Guidelines Section 15064.5(b)(1)). Material impairment would occur if the project would result in demolition or material alteration of those physical characteristics that convey the resource’s historical significance (CEQA Guidelines Section 15064.5(b)(2)). The integrity of a resource is evaluated based on a number of factors, including location, design, setting, materials, feeling, association, and workmanship.

5. Environmental Analysis

Figure 5.13-4

Future Bicycle Network



Source: Fehr & Peers, 2015



CITY OF PASADENA
GENERAL PLAN UPDATE
DRAFT EIR



PRA-06.0L

7/9/2015

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Bungalow heaven is a landmark district that qualifies as a historic resource pursuant to Section 15064.5. When evaluating whether a new project would impact a historic district a number of factors are considered, including but not limited to, the criteria for its listing on the National or State Register, its boundaries and context, architectural design, and its contributing elements. The City's Design Guidelines for Historic Districts would address impacts related to the district's integrity – visual setting, feeling, and association –and policies would ensure that no new project would destroy an essential existing element. Furthermore, SB 1818 concessions cannot be granted if a project impairs a historic resource as set forth in Section 2.2, *Density Bonus* and response to Comment A1-20.

A1-19 Land use changes allowing mixed uses and affordable housing has been adequately analyzed throughout the entire DEIR and support the proposed Land Use Element goals and policies. The application of the Low and Medium Mixed Use General Plan designations to the North Lake Specific Plan area is designed to provide designations consistent with the existing specific plan development standards. The proposed land use change along North Lake Avenue between East Washington Boulevard and East Mountain Street is not expected to result in a change in the number of affordable housing units from what is currently allowed. This area is currently zoned in the North Lake Specific Plan as SP-1a and SP-1b, which already allows for mixed-use and work/live units.

The proposed General Plan Update does not change the development standards, including height limits in the North Lake Specific Plan. Current zoning and land use categories permit by right mixed use and multi-family development in the two subareas between East Mountain and East Washington. These projects can currently utilize the development concession described in SB1818. Therefore, the General Plan Update is not providing new opportunities for density bonus for these areas that does not already exist. Instead it is supporting the continued use of mixed use and multi-family projects to provide affordable housing, attract investment to create facilities and infrastructure improvements, while imposing a series of strict design and compatibility standards and public participation through the discretionary review and approval process. Impacts related to aesthetics, historic resources, and land use have been adequately analyzed in the DEIR.

A1-20 The commenter states that allowing mixed uses within the North Lake Specific Plan area is inconsistent with many proposed general plan goals and policies. Goals and policies that direct development to specific plan areas and corridors and protect historic neighborhoods are not mutually exclusive and do not conflict. The table below demonstrates the internal consistency between the guiding principles, goals, and policies identified by the commenter.

3. Response to Comments

Table A1.1 Internal Consistency of Proposed Land Use Element and Land Use Diagram

Principle, Goal, or Policy Identified by Commenter	Response to Comments Regarding Internal Consistency
Guiding Principles	
<p>Land Use Principle 1: Growth will be targeted to serve community needs and enhance the quality of life. Higher density development will be directed away from residential neighborhoods and into the Central District, Transit Villages, and Neighborhood Villages. These areas will have a diverse housing stock, job opportunities, exciting districts with commercial and recreational uses, and transit opportunities. New development will build upon Pasadena's tradition of strong sense of place, great neighborhoods, gardens, plazas, parks, and trees.</p>	<p>Consistent. Despite the fact that the Central District comprises only 5.4 percent of Pasadena's 14,803-acre area, the Central District Specific Plan area would accommodate 50 percent of the City's net growth at buildout under the General Plan Update. This deliberate targeting of growth into the Central District and adjacent transit villages was designed to direct growth away from lower-density residential neighborhoods such as Bungalow Heaven.</p> <p>At buildout, the North Lake Specific Plan area would represent a small percentage of the City's projected growth and does not represent a major intensification of uses in north-central Pasadena.</p>
<p>Land Use Principle 2: Pasadena's historic resources will be preserved. Citywide, new development will be in harmony with and enhance Pasadena's unique character and sense of place. New construction that could affect the integrity of historic resources will be compatible with, and differentiated from, the existing resource.</p>	<p>Consistent. As discussed in Section 5.4, <i>Cultural Resources</i>, of the DEIR, the City's historic resources, including those in Bungalow Heaven, are protected by an extensive collection of federal, state, and local regulations. Redevelopment along the North Lake Avenue corridor would be required to comply with design guidelines found in the North Lake Specific Plan, citywide design guidelines, and General Plan policies related to community compatibility. Furthermore, the City has a robust design review process that takes into consideration the historic and aesthetic integrity of existing neighborhoods. The General Plan Update's proposal to encourage existing Mixed Use opportunities along North Lake Avenue does not, alone, represent a substantial threat to the preservation or integrity of an adjacent historic neighborhood.</p>
Goals and Policies	
<p>Policy 1.1: Basic Growth Policy. Accommodate growth that is consistent with community values and that complements the scale and character of Pasadena's unique residential neighborhoods, business districts, and open spaces.</p>	<p>Consistent. See responses to Land Use Principles 1 and 2. The General Plan Update seeks to align its proposed development intensities and uses with the existing regulations in the Specific Plan. Most of the North Lake Avenue corridor, especially those areas outside of Neighborhood Villages at major intersections, would only accommodate development at an intensity and scale that is compatible with the surrounding neighborhood. The proposed General Plan encourages existing Mixed Use opportunities at scales that are generally consistent with the existing Specific Plan Development Standards.</p>
<p>Policy 1.2: Targeted Growth. Target growth and new construction in infill areas and away from Pasadena's residential neighborhoods and open spaces by redeveloping underutilized commercial and industrial properties, especially within the Central District, Transit Villages, Neighborhood Villages, and along selected corridors.</p>	<p>Consistent. As indicated in the response to Land Use Principle 1, the General Plan Update heavily targets growth in areas of the Pasadena that are already heavily urbanized and/or currently dominated by nonresidential uses. Approximately 84 percent of the growth allowed under the General Plan Update would occur in Specific Plan areas, which are almost entirely mutually exclusive from single-family residential neighborhoods. The modest growth allowed in the North Lake Specific Plan area under the proposed General Plan is consistent with Policy 2.1, which clearly states that some growth would be targeted toward underutilized properties "along selected corridors."</p>
<p>Policy 4.11: Development that is Compatible. Require that development demonstrates a contextual relationship with neighboring structures and sites addressing such elements as building scale,</p>	<p>Consistent. As indicated in previous responses, the scale and type of redevelopment allowed in the North Lake Specific Plan area under the General Plan Update is not a substantial departure</p>

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<p>massing, orientation, setbacks, buffering, the arrangement of shared and private open spaces, visibility, privacy, automobile and truck access, impacts of noise and lighting, landscape quality, infrastructure, and aesthetics.</p>	<p>from existing Specific Plan development standards along the corridor. Furthermore, development and redevelopment would be required to comply with applicable design guidelines and development standards enforced by the City, which devote considerable attention to issues of community compatibility, content-sensitive design, and the other design considerations listed under Policy 4.11.</p>
<p>Policy 4.12: Transitions in Scale. Require that the scale and massing of new development in higher-density centers and corridors provide appropriate transitions in building height and bulk and are sensitive to the physical and visual character of adjoining lower-density neighborhoods.</p>	<p>Consistent. Under the General Plan Update, higher-density development is concentrated in the Central District and a handful of other nodes that are already heavily urbanized. As shown in the proposed Land Use Diagram, commercial and mixed uses allowed in the North Lake corridor deliberately step down from Medium Mixed Use (at Villa Street and Washington Boulevard) to Low Commercial and Low Mixed Use along the middle stretch of the corridor as a response to the character of adjoining lower-density neighborhoods. Appropriate transitions in building height and bulk between the North Lake interface and the rear of each applicable parcel would be evaluated by the City on a project-level basis as redevelopment projects are proposed.</p>
<p>Goal 6: Character and Scale of Pasadena. A built environment that evolves while maintaining Pasadena's unique sense of place, character, and the urban fabric.</p>	<p>Consistent. Throughout the proposed Land Use Element, great attention is devoted to character and scale, as demonstrated by the comprehensiveness of the policies identified in this table. The proposed Land Use Diagram is consistent with these policies by proposing no land use changes in Bungalow Heaven. New development proposed in the North Lake corridor under the General Plan Update would only result in infill along an existing commercial corridor. It would not dramatically alter the character or urban fabric of the North Lake Avenue Specific Plan area.</p>
<p>Policy 6.1: Sense of Place and History. Require new development and changes to existing development to be located and designed to respect the defining elements of Pasadena's character and history such as its grid street pattern, block scale, public realm, neighborhoods and districts, building massing and heights, significant architecture, and relationship to the mountains and Arroyo Seco.</p>	<p>Consistent. The North Lake Specific Plan area generally consists of a single row of parcels on either side of North Lake Avenue. Infill development along the corridor would not alter the street pattern, block scale, or neighborhood fabric of the area. Furthermore, the maximum FARs allowed along the corridor would not be expected to affect existing views north to the San Gabriel Mountains.</p>
<p>Policy 6.2: Established Neighborhoods. Preserve, protect, and enhance established residential neighborhoods by providing sensitive transitions between these and adjoining areas. Require new development to respect and respond to the existing physical characteristics that contribute to the overall character and livability of the neighborhood.</p>	<p>Consistent. See response to Policy 4.12, above.</p>
<p>Policy 7.3: Compatibility. Require that new and adaptively re-used buildings are designed to respect and complement the defining built form, massing, scale, modulation, and architectural detailing of their contextual setting.</p>	<p>Consistent. Adoption of the General Plan Update does not involve the approval of specific development projects. Accordingly, the proposed Land Use Diagram itself does not affect the architectural character of the corridor or surrounding neighborhoods. The built form, massing, scale, modulation, and architectural details of individual projects would be evaluated by the City on a project-level basis.</p>
<p>Goal 8: Historic Preservation. Preservation and enhancement of Pasadena's cultural and historic buildings, landscapes, streets and districts as reminders of its past and a source of community identity, and social, ecological, and economic vitality.</p>	<p>Consistent. The General Plan Update does not propose land use changes—or other changes to the urban fabric—in Bungalow Heaven precisely to preserve the community identity of the area as a historically and aesthetically important neighborhood.</p>
<p>Policy 8.1: Identify and Protect Historic Resources. Identify and protect historic resources that represent significant examples of the City's history.</p>	<p>Consistent. The General Plan Update and the DEIR both identify Bungalow Heaven as an important historic resource. No land use changes are proposed for the district in the proposed Land Use Diagram. Furthermore, as demonstrated by the policies listed in this table, the text of the proposed Land Use Element gives</p>

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	considerable attention to the protection of historic resources.
Policy 8.5 Scale and Character of New Construction in a Designated Landmark and Historic Districts. Promote an architecturally sensitive approach to new construction in Landmark and Historic districts. Demonstrate the proposed project's contextual relationship with land uses and patterns, spatial organization, visual relationships, cultural and historic values, and relationships in height, massing, modulation, and materials.	Consistent. The General Plan Update does not propose new construction projects or increase in development capacity within Bungalow Heaven. Individual projects pursued in the district under the General Plan Update would be evaluated by the City on a project-level basis for their consistency with Policy 8.5 and the broad range of applicable federal, state, and local regulations regarding development in landmark and historic districts.
Policy 21.3: Neighborhood Character. Maintain elements of residential streets that unify and enhance the character of the neighborhood, including parkways, street trees, and compatible setbacks.	Consistent. There are no changes to the physical elements of local streets in Bungalow Heaven proposed in the General Plan Update. Because there is no street widening, reconfiguring of right-of-way, or additional development capacity planned on the streets that traverse the historic district, the parkways, street trees, and setbacks are expected to remain unchanged during the planning period of the General Plan Update.
Goal 22: Single-Family Neighborhoods. Distinct and quality single-family residential neighborhoods distinguished by their identity, scale, and character.	Consistent. The General Plan Update was built around the idea of preserving the identity, scale, and character single-family neighborhoods. Accordingly, no land use changes or additional development capacity are planned for Bungalow Heaven.
Policy 25.4: Architecture and Site Design. Require that new development protect community character by providing architecture, landscaping, and urban design of equal or greater quality than existing and by respecting the architectural character and scale of adjacent buildings.	Consistent. The premise of Policy 25.4 is specifically aimed at requiring the design of new projects to be respectful of their surroundings. The General Plan Update does not propose—or involve the approval of—any specific development projects. The proposed Land Use Diagram merely prescribes the overall type and scale of land uses that would be allowed along the North Lake Avenue corridor. The architecture, landscaping, and urban design of new projects would be evaluated by the City on a project-level basis for their consistency with Policy 25.4 and other design guidelines and standards.
Policy 36.4: Neighborhood Compatibility. Require that the types of use and location, scale, and design of development buffer commercial and mixed-use development on Lake Avenue from adjoining lower density residential neighborhoods.	Consistent. The types of uses allowed in the North Lake Specific Plan area were specifically chosen to respond to the character of lower density residential neighborhoods on either side of the corridor. For example, while Medium Mixed Use development is allowed at the major intersections of North Lake/Villa Street and North Lake/Washington Boulevard, most of the 1-mile stretch of corridor between these intersections (which travels between Bungalow Heaven and other single-family residential neighborhoods to the west) allows lower-scaled development in the Low Mixed Use and Low Commercial land use categories. Although the proposed Land Use Diagram would allow new uses with specific FARs adjacent to landmark and historic districts, new development would still need to comply with the North Lake Specific Plan and development standards (e.g., height, massing, and setback limitations) in Municipal Code Section 17.34.040 and the Urban Design, Sense of Place, and Architectural policies in the Land Use Element.

A1-21 BHNA submitted a comment letter during the 30-day public review period for the Notice of Preparation (NOP). Formal responses to NOP comment letters were not prepared and are not required by CEQA. Table 1-4 in the DEIR identifies that the BHNA letter dated October 10, 2013 was received, summarizes the issues, and indicates where those issues are addressed in the DEIR. The commenter states that the DEIR

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fails to address the concerns in the October 10, 2013 but does not explain how. This letter brings up the same issues as discussed in Comment Letter A1, which are being addressed herein. No further response is necessary.

A1-22 Please refer to Section 2.2. The commenter states that allowing higher density, mixed-uses within North Lake Specific Plan is inconsistent with General Plan Objectives 1, 3 and 4. However, the proposed land uses is not inconsistent with these objectives because it directs growth near transit opportunities and corridors while preserving established neighborhoods. It is not clear from the comment how the proposed land uses would affect the sense of place or great neighborhoods characterized by Bungalow Heaven. This comment relates to the General Plan Update and Draft Land Use Element, not the potential environmental impacts of the project. However, the comment is noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.

The commenter appears to state that State Density Bonus Law conflicts with Pasadena's General Plan. State Density Bonus Law applies to all cities in California, including charter cities. In that way, State Density Bonus Law overrides local development plans, goals, policies, and standards for applicable density bonus projects. The City cannot, pursuant to state law and rules of statutory construction, elevate its General Plan goals and policies over State Density Bonus Law.

A1-23 Please refer to Section 2.2, *State Density Bonus Law*.

A1-24 The General Plan Update would not change land uses within Bungalow Heaven. The aesthetic impacts associated with land use changes along North Lake Avenue were adequately analyzed at Page 5.1-41 and 5.1-44 of the DEIR. Impacts were found to be less than significant; therefore no mitigation measures were required.

A1-25 The commenter is correct in stating that Bungalow Heaven is considered a historical resource according to CEQA Guidelines Section 15064.5.

A1-26 Please refer to Section 2.2, *State Density Bonus Law*.

A1-27 The proposed Land Use Element contains a number of goals and policies to protect historic resources, including Goal 8 and Policies 8.1 through 8.10. It is the City's intent to protect historic resources and to ensure that new construction is consistent with the scale and character of designated landmark and historic districts. There is no evidence to show that these policies or the allowance of mixed use in the North Lake Specific Plan would result in a decline in historic integrity or value in Bungalow Heaven. The purpose of the proposed General Plan Policies are to allow development to occur in the higher density areas, corridors, and transit areas, while creating compatibility with established single family residential neighborhoods. Specifically, proposed General Plan Policy 36.4 requires that the type of land use, location, and scale within North Lake Specific Plan

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buffers the commercial and mixed-use development from lower density residential neighborhoods.

A1-28 Section 15126.6(a) of the CEQA Guidelines indicates that the purpose of analyzing project alternatives is to identify alternatives that would "...avoid or substantially lessen any of the significant effects of the project." The DEIR found that aesthetic and historic impacts of the proposed project would be less than significant. Therefore, the range of project alternatives was developed based on their potential ability to reduce impacts to documented potentially significant impacts. For the proposed project, these included impacts related to air quality, greenhouse gas emissions, noise, and traffic (see Chapter 6 of the DEIR for a list of the project's significant unavoidable adverse impacts). For a comprehensive response to concerns regarding SB 1818, see Section 2.2 of this FEIR.

A1-29 For the reasons enumerated above and the analysis provided in the DEIR and Section 2.2 of this FEIR, the City disagrees that the General Plan Update would result in significant aesthetic and historic impacts to Bungalow Heaven. However, the recommendation to change land uses in the North Lake Specific Plan will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.


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LETTER A2 –CalTrans (3 pages)

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

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!*

March 23, 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
SCH # 2013091009
Ref. IGR/CEQA No. 130909AL-NOP
IGR/CEQA No. 150144AL-DEIR

Dear Mr. Chima:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is the adoption and implementation of an update to the City of Pasadena General Plan and Specific Plan amendments to update the development caps and boundaries within each specific plan area. The proposed project focuses on the Land Use and Mobility Elements and Land Use Diagram. A2-1

On page 17 of the Draft Transportation Analysis Report (Appendix I Mobility Report), Table 5 summarizes the transportation performance measures adopted by City Council, including the threshold established for determining a CEQA impact and the existing value of the metric. The metric include VMT Per Capita, VT Per Capita, Proximity and Quality of Bicycle Network, Proximity and Quality of Transit Network, and Pedestrian Accessibility. A brief discuss of the Existing Value and the regional average value should be provided to clarify reasons using Existing Value instead of the regional average value. A2-2

From CEQA New Section 15064.3, Subdivision (b): Criteria for Analyzing Transportation Impacts, this subdivision focuses four specific criteria for determining the significance of transportation impacts: 1) vehicle miles traveled and land use projects, 2) induced travel and transportation projects, 3) safety, and 4) methodology. A2-3

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Caltrans is concerned that when an excessive amount of vehicles are expected to use an off-ramp they may potentially back up onto the mainline, which in turn may lead to rear-end accidents. For the General Plan, a safety analysis for the off-ramps within the City should be included for all scenarios. Caltrans consultation is highly recommended.

A2-3
cont'd

On page 49, Table 13-LOS Thresholds for CMP Freeway Mainline Segments, LOS ranges from LOS A to LOS F only according to Congestion Management Program. LOS F(0), F(1), F(2), F(3) should be removed from the Table. Table 14-CMP Analysis Results for Freeway Mainline Segments scenarios should be revised accordingly.

A2-4

On page 57, the study identifies 2 freeway segments that will have significant impact on the I-210 with mitigation measure of adding another lane to the freeway. However, "a mitigation resulting in increased automobile capacity through roadway widening is inconsistent with the General Plan's goals and policies. Therefore, this impact would remain significant and unavoidable." Caltrans would like to work with the City search for innovative solutions on the freeway system such as identifying alternative routes to the I-210 corridor during peak hours, upgrading the directional signs, installing Intelligent Transportation System, proposing other modes of commuting, etc. The City and Caltrans should work together to develop mitigating alternative strategies that would be mutually acceptable and benefiting to both agencies.

A2-5

As a reminder, Caltrans encourages the City to work with neighboring developing cities such as City of Arcadia, South Pasadena, Altadena, and Sierra Madre to resolve any cumulative significant traffic impacts on the State facilities. The plan to work with the neighboring cities should be discussed in the Circulation Element of the General Plan or a suggested Resolution/Policy should be passed such as follows:

- The City will work with neighboring cities to address cumulative significant traffic impact on freeway I-210 and SR-134, and on/off ramps as a result of build out of the General Plan.
- The City will work with Caltrans to identify potential cumulative traffic impact and mitigation measures on the mainline and on/off ramps.
- The City will form a fair share fee program working with neighboring cities to improve the State facilities.
- The City's existing traffic impact fees will include any State facility improvement as part of the cumulative traffic impact. Procuring funds toward freeway segments, freeway interchanges, freeway on/off-ramps, as well as for bus and rail transit facilities will be in the goals of the City.

A2-6

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Senate Bill 743 preserves the City authority to plan the circulation system that is right for their community. The City may continue to require new projects to contribute to transportation enhancements in connection with project approvals. To the extent that the City adopts policies that have environmental impacts, those impacts would need to be studied. Once addressed in an environmental impact report for a General Plan, such impacts would not normally need to be re-evaluated for later projects. (Public Resources Code section 21083.3).

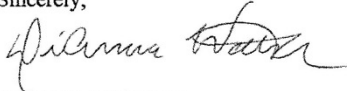
A2-7

Caltrans would like to extend an invitation to meet with City staff and traffic consultants to discuss potential cumulative traffic impact and mitigation on the State facilities within the City jurisdiction.

A2-8

Caltrans is committed in working with the City to solve traffic congestion on the State facilities. 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. 150144AL.

Sincerely,



DIANNA WATSON
Branch Chief
Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

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A2. Response to Comments from Caltrans, dated March 23, 2015.

A2-1 Caltrans reviewed the General Plan Update and EIR and provided comments related to traffic. Responses are detailed in A2-2 through A2-8 below.

A2-2 Prior to the release of the General Plan Update, the City of Pasadena undertook an extensive process to develop new transportation metrics and CEQA thresholds of significance (refer to Section 2.1). As part of this process, the City evaluated a number of different metrics and thresholds and received community input through a series of public meetings. The City Council subsequently approved a set of CEQA thresholds that were developed to evaluate a wide range of transportation-related impacts. Those CEQA thresholds define what constitutes a significant impact in the City of Pasadena and require land use development not to exceed existing thresholds based on VMT Per Capita, VT Per Capita, service population within a ¼ mile of bicycle or transit facilities, and citywide pedestrian accessibility score.

The VMT Per Capita calculations were based on the use of a locally validated travel demand model (developed per the Caltrans travel demand modeling guidelines) that provides a finer level of detail than a regional model for VMT traveling on Pasadena facilities both for internal trip making and external trips that begin or end in Pasadena. The regional VMT per Capita is based on a much larger six County area (Los Angeles County, Orange County, Riverside County, Imperial County, San Bernardino County and Ventura County) and as a result the Pasadena Existing VMT Per Capita is more accurate at a local level.

By comparing VMT per capita and VT per capita changes against the existing values for the City, the City is committing to improving its own VMT per capita and VT per capita outcomes, rather than relying on comparisons to regional values, which are influenced by external land use and transportation decisions that are largely beyond the City's ability to control. Improving the City's values for these metrics will contribute to improving the regional values.

In order to address Caltrans concerns, the City proposed new General Plan policies as follows:

New Policy *City of Pasadena will monitor and evaluate the development and adoption of future VMT per capita 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 involving Caltrans owned intersections at freeway ramp termini in the development of the*

3. Response to Comments

future transportation impact fee, including but not limited to the I-210 Connected Corridors project.

A2-3 The State Office of Planning and Research (OPR) is proposing to add a new Section 15064.3 in the CEQA Guidelines. However, the language is in the draft stage, OPR is in the process of evaluating numerous public comments, and the new guidelines have not yet been adopted. The DEIR was evaluated based on the City's adopted thresholds of significance, as described in response to Comment A2-2.

The DEIR for the Pasadena General Plan Update is a program level analysis that evaluates transportation impacts associated with a future land use plan. The detail provided in this document is less detailed than a Project EIR, which evaluates impacts of a specific land use development. The program level EIR focuses on the secondary effects that can be expected to follow the adoption of the General Plan, but is not required to be as detailed as individual development project EIRs in its analysis, including queuing on all freeway off-ramps. In order to address Caltrans' concern that future developments should assess any impacts to increased queuing on freeway off-ramps, the city will administratively amend the Transportation Analysis Guidelines (see Appendix A of this FEIR) 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 may lead to conditions of approval being placed on the project to reduce the queuing length on the off-ramps.

A2-4 Level of Service (LOS) thresholds F(0), F(1), F(2), and F(3) are reported in the Congestion Management Program (CMP) analysis in accordance with the 2010 Congestion Management Program for Los Angeles County Exhibit D-6 "General Procedure for Freeway Segment (Mainline) Analysis" (page D-39). Therefore, Table 13 will remain as is consistent with the CMP.

A2-5 The City appreciates Caltrans input on innovative strategies to solve transportation impacts on freeways. The City met with Caltrans on May 13, 2015 to address this issue and the City expects ongoing coordination between the jurisdictions.

The City of Pasadena's Draft Mobility Element has three main objectives:

1. Enhance livability
2. Encourage walking, biking, transit and other alternatives to motor vehicles
3. Create a supportive climate for economic viability

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The analysis undertaken for the City of Pasadena's General Plan Update, Draft Mobility Element, and Land Use Element has shown that Vehicle Trips Per Capita and VMT Per Capita are reduced when compared to existing levels. The Mobility Element has a series of policies that are aimed at the promotion and use of alternatives to the automobile, as well as trip reducing policies such as car sharing. The objectives and policies have been developed to provide alternatives for both local and regional trip making, where possible, reducing trips.

Regarding the specific comment on the I-210 congestion, the City will coordinate with Caltrans to explore transportation management measures to address these concerns. Please note that the Draft Mobility Element also has a specific policy that addresses this comment directly:

Policy 1.26 – Continue to coordinate with other governmental agencies in the area, including municipalities, SCAG, MTA and the San Gabriel Council of Governments to address mutual issues of concern related to the transportation system.

As discussed at the meeting on May 13, 2015, 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.*

A2-6 Please refer to response to Comments A2-2, A2-3, and A2-5. Additionally, the Draft Mobility Element includes a policy to coordinate with neighboring cities to address cumulative traffic impacts, as follows:

Policy 1.26 – Continue to coordinate with other governmental agencies in the area, including municipalities, SCAG, MTA and the San Gabriel Council of Governments to address mutual issues of concern related to the transportation system.

A2-7 The commenter is correct. To the degree that general plan policies and goals have been evaluated and received CEQA clearance, further environmental processing on those items would not need to be reevaluated.

A2-8 On May 13, 2015 the City of Pasadena Department of Transportation and Fehr & Peers (the City's traffic consultant) met with Caltrans to address the issues discussed in this letter. The City is committed to working with Caltrans and continuing to coordinate on

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these important issues. Following the meeting staff from Caltrans and the City of Pasadena Department of Transportation have had numerous conversations and have worked collaboratively to develop responses to issues raised by Caltrans. Follow up letters detailing the City's response and Caltrans' concurrence with the responses is provided in Appendix B of this FEIR.

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LETTER A3– City of Pasadena Public Health Department (4 pages)

Chima, Vicrim

From: Redke, Erika
Sent: Tuesday, March 24, 2015 6:01 PM
To: Chima, Vicrim
Subject: Comment on Draft Land Use Element
Attachments: Community Gardens Language in Draft Land Use Element.docx

Hi Vicrim,

I reviewed the Draft Land Use Element (dated January 22, 2015) in order to identify language related to community and neighborhood gardens. As I mentioned to you before, the Nutrition and Physical Activity Program is interested in understanding the policies and procedures influencing the development of community or neighborhood gardens throughout Pasadena. Since community gardens greatly benefit the health of communities, we want to ensure that the process to start and maintain one is streamlined. Attached you will find a table with specific language from the Draft Land Use Element that explicitly refers to or relates to community gardens. I was pleased to find “community gardens” and “access to locally grown foods” in several parts of the draft element.

A3-1

As “Section 2: Draft Land Use Implementation Plan” proposes, the Zoning Code will be reviewed and amended to achieve consistency with the General Plan’s Land Use Diagram and goals and policies. Unfortunately, I found some aspects of the existing Zoning Code that doesn’t support - and instead discourages - the development of community gardens in Pasadena.

- 1) Of all the zoning districts, only Residential Districts list “neighborhood garden” as an allowable use, and only with a Minor Conditional Use Permit. (Table 12-2 of the Zoning Code)
- 2) Of all the specific plans, only the Lincoln Avenue Specific Plan lists “neighborhood garden” as an allowable use only in RM-16 and with a Minor Conditional Use Permit. (Table 3-16 of the Zoning Code)

A3-2

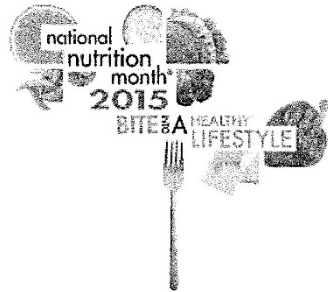
I am wondering what kind of amendments to the Zoning Code can be made to better support the proposed goals and policies of the Draft Land Use Element. I recognize that this may be a separate process and requires time, but the N/PA Program staff would be able to help. We could research best practices and even draft some language. I’d be happy to set up a time to discuss this further.

Please advise.

Erika Redke

Community Services Representative
Nutrition Education & Obesity Prevention
City of Pasadena Public Health Department
1845 North Fair Oaks Avenue
Pasadena, CA 91103
office: (626)744-6136

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3. Response to Comments

Upon review of the Draft Land Use Element, dated January 22, 2015, the following table was created with the purpose of identifying language related to community gardens.

Community Garden-Related Language in Draft Land Use Element dated January 22, 2015			
Page	Section Title	Language	Notes
9	Land Use Goals and Policies – Goal 2 (Land Use Diversity)	2.10. Healthy Foods. Promote the development of uses providing healthy and locally-grown food choices for Pasadena’s residents (i.e. brick and mortar facilities, community gardens, and farmers markets).	
9	Land Use Goals and Policies – Goal 2 (Land Use Diversity)	2.12. Health and Wellness. Adopt a framework of policies that characterize and encourage the connections between access to locally grown foods, nutritional education, the encouragement of physical activity, and an overall commitment to health and wellness of Pasadena’s youth, adults, and seniors.	There is currently no definition for “locally grown foods” or “access” in Zoning Code. What does access mean?
12	Land Use Goals and Policies – Goal 5 (Pedestrian-Oriented Places)	5.3. Community Greenways. Improve Pasadena’s public sidewalks as “greenway” corridors with extensive tree canopies, connecting its neighborhoods, Transit Villages, Neighborhood Villages, neighborhoods, parks, schools, and open spaces.	Is edible landscaping allowed in on “community greenways”?
12	Land Use Goals and Policies – Goal 6 (A Sense of Place/Character and Scale of Pasadena)	6.7. Public Safety and Community Design. Require that neighborhoods, centers, streets, and public spaces be designed to enhance public safety and discourage crime by providing street-fronting uses (“eyes on the street”), adequate lighting and sight lines, and features that cultivate a sense of community ownership.	Neighborhood/community gardens could be considered a feature that cultivates a sense of ownership.
16	Land Use Goals and Policies – Goal 10 (A Sustainable Environment/City Sustained and Renewed)	10.12. Urban Open Spaces. Preserve and develop urban open spaces such as landscaped parklets, paseos, courtyards, and community gardens. Ensure adequate public access to these open	

3. Response to Comments

A3. Response to Comments from City of Pasadena Public Health Department, dated March 24, 2015.

A3-1 The commenter is in support of General Plan Update policies that promote community gardens and access to locally grown foods. Such policies include Policies 2.10, 2.12, 5.3, 6.7, and 10.12. No further response is necessary.

A3-2 The commenter states that the existing zoning code and Lincoln Avenue Specific Plan do not support community gardens. The proposed project is updating the General Plan and does not include an update to the zoning code. The City will begin the process to update the zoning code consistent with the General Plan upon General Plan adoption. These comments, including the suggestions outlined in the table provided will be forwarded to the decision makers for consideration.

3. Response to Comments

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3. Response to Comments

LETTER A4 – County of Los Angeles Fire Department (3 pages)



COUNTY OF LOS ANGELES
FIRE DEPARTMENT
1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

February 3, 2015

Vicrim Chima, Planner
City of Pasadena
Planning and Community Development Department
175 N. Garfield Avenue
Pasadena, CA 91109

Dear Mr. Chima:

DRAFT ENVIRONMENTAL IMPACT REPORT, DRAFT LAND USE ELEMENT, AND DRAFT MOBILITY ELEMENT, PROJECT NO: PRA.06; SCH NO. 2013091009, "PASADENA GENERAL PLAN UPDATE," THE PROPOSED PROJECT IS THE ADOPTION AND IMPLEMENTATION OF AN UPDATE TO THE CITY OF PASADENA GENERAL PLAN AND SPECIFIC PLAN AMENDMENTS TO UPDATE THE DEVELOPMENT CAPS AND BOUNDARIES WITHIN EACH SPECIFIC PLAN AREA, PASADENA (FFER 201500020)

The Draft Environmental Impact, Draft Land use Element, and Draft Mobility Element has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

A4-1

PLANNING DIVISION:

1. The subject property is entirely within the City of Pasadena, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CARSON	DUARTE	HUNTINGTON PARK	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CERRITOS	EL MONTE	INDUSTRY	LAKEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CLAREMONT	GARDENA	INGLEWOOD	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	COMMERCE	GLENORA	IRVINDALE	LAWNDALE	PALOS VERDES ESTATES	ROSEMead	WALNUT
BELL GARDENS	COVINA	HAWAIIAN GARDENS	LA CANADA FLINTRIDGE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	CUDAHY	HAWTHORNE	LA HABRA	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAG
BRADBURY							WHITTIER

3. Response to Comments

Vicrim Chima, Planner
February 3, 2015
Page 2

LAND DEVELOPMENT UNIT:

1. This project is located entirely in the City of Pasadena. Therefore, the City of Pasadena's Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the Los Angeles County Fire Department. However, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the Los Angeles County Fire Department.
2. The statutory responsibilities of the County of Los Angeles Fire Department's Land Development Unit are to review and comment on all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for firefighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities located within non-contract cities. The County of Los Angeles Fire Department's Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.
3. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department's Land Development Unit's Inspector Claudia Soiza at (323) 890-4243.
4. The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment on this project.

A4-1
cont'd

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.

A4-2

3. Response to Comments

Vicim Chima, Planner
February 3, 2015
Page 3

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division has no objection.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

KTJ:ad

A4-3

3. Response to Comments

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3. Response to Comments

A4. Response to Comments from County of Los Angeles Fire Department, dated February 3, 2015.

A4-1 The County of Los Angeles Fire Department reviewed the Pasadena General Plan Update Draft Environmental Impact Report, Draft Land Use Element, and Draft Mobility Element. The Planning Division stated that that project does not impact emergency responsibilities of the department. The Land Development Unit states that since City is within the jurisdiction of the Pasadena Fire Department, there is unlikely to be impacts to the county. Contact information was provided if further correspondence is needed. No further response is necessary.

A4-2 The Forestry Division has no comments. No further response is necessary.

A4-3 The Health Hazardous Materials Division has not comments. No further response is necessary.

3. Response to Comments

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3. Response to Comments

LETTER A5 – County of Los Angeles Fire Department (2 pages)



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

February 25, 2015

Vicrim Chima, General Plan Manager
City of Pasadena
Planning and Community Development
175 N. Garfield Avenue
Pasadena, CA 91109

Dear Ms. Chima:

**NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT,
SCH NO. 2013091009, "PASADENA GENERAL PLAN UPDATE," THE ADOPTION
AND IMPLEMENTATION OF AN UPDATE TO THE CITY OF PASADENA GENERAL
PLAN AND SPECIFIC PLAN AMENDMENTS TO UPDATE THE DEVELOPMENT
CAPS AND BOUNDARIES WITHIN EACH SPECIFIC PLAN AREA, CITYWIDE,
PASADENA (FFER 201500030)**

The Notice of Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

A5-1

PLANNING DIVISION:

1. The subject property is entirely within the City of Pasadena, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CARSON	DUARTE	HUNTINGTON PARK	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CERRITOS	EL MONTE	INDUSTRY	LAKEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CLAREMONT	GARDENA	INGLEWOOD	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	COMMERCE	GLENDDORA	IRVINDALE	LAWDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COVINA	HAWAIIAN GARDENS	LA CANADA FLINTRIDGE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	CUDAHY	HAWTHORNE	LA HABRA	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
BRADBURY							WHITTIER

3. Response to Comments

Vicrim Chima, General Plan Manager
February 25, 2015
Page 2

LAND DEVELOPMENT UNIT:

1. The Fire Prevention Division's Land Development Unit has no additional comments regarding this project. The conditions that were addressed in EIR 201300156, dated September 24, 2013, have not been changed at this time

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

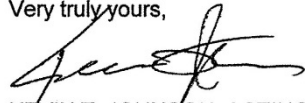
A5-1
cont'd

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division has no objection.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

KTJ:ad

3. Response to Comments

A5. Response to Comments from County of Los Angeles Fire Department, dated February 25, 2015.

A5-1 Two letters were sent from the County of Los Angeles Fire Department. All comments in this letter were addressed in Responses to Comments A4-1 through A4-3. No further response is necessary.

3. Response to Comments

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3. Response to Comments

LETTER A6 – Pasadena Chamber of Commerce (1 page)



March 20, 2015

Planning & Community Development Department
175 N. Garfield Avenue
Pasadena, CA, 91109
Att: Vikrim Chima
VIA E-mail

Re: General Plan EIR comments from the Pasadena Chamber of Commerce

To Whom It May Concern,

The Pasadena Chamber of Commerce has been involved in the update of the Pasadena General Plan from the beginning of the process many years ago. We are very familiar with the outreach and development of the preferred alternative, as well as the various proposals studied.

We continue to be disappointed that no real and detailed economic analysis was done to accompany the update of the General Plan. As one of the objectives of the plan is to, "Achieve economic vitality and fiscal responsibility by providing jobs, services, revenues and opportunities with a diverse economic base" we would have anticipated a more than cursory assumption that the proposed plan does that.

As we have experienced, there is a great demand for housing in downtown Pasadena. While we believe Pasadena's downtown can support more housing than anticipated in the proposed General Plan, we do appreciate the additional housing allowed in downtown.

The Chamber also supports utilizing underused properties in our city to encourage economic development. We would like to see adaptive reuse of properties in east Pasadena, especially problem properties along east Colorado Boulevard, for technology and research and development incubators.

That said, the Chamber of Commerce supports the proposed project. Of those studied, the proposed project provides for economic growth while maintaining the quality of life and livability of our neighborhoods.

Thank you,

A handwritten signature in black ink, appearing to read "Paul Little".

Paul Little
President and CEO

A6-1

3. Response to Comments

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3. Response to Comments

A6. Response to Comments from Pasadena Chamber of Commerce, dated March 20, 2015.

A6-1 The Pasadena Chamber of Commerce expressed their disappointment that an economic analysis was not conducted and an opinion that Pasadena's downtown can support more housing than proposed in the General Plan Update. In accordance with the California Environmental Quality Act (CEQA), economic effects shall not be treated as significant effects on the environment (CEQA Guidelines Section 15131). However, the City is preparing an economic analysis under a separate process apart from CEQA. The economic analysis will be provided to City Council in its consideration of the General Plan Update adoption.


This comment relates to the land uses and policies proposed by the General Plan Update, not the potential environmental impacts of the project. However, the comment is noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.

3. Response to Comments

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3. Response to Comments

LETTER A7– Pasadena Heritage (5 pages)



**PASADENA
HERITAGE**
PRESERVATION | ADVOCACY | EDUCATION

651 SOUTH ST. JOHN AVENUE
PASADENA, CALIFORNIA 91105-2913

P 626.441.6333 F 626.441.2917
WWW.PASADENAHERITAGE.ORG

City of Pasadena
Design and Historic Preservation Planning Department
Attn: Vicrim Chima
175 N. Garfield Ave.
Pasadena, CA 91101

March 23, 2015

Pasadena General Plan Update - Draft Environmental Impact Report

Dear Mr. Chima:

We commend you and the team for producing a well-organized and readable document, despite the complexities of the project and required analysis. We also appreciate the decision to consolidate the Historic Preservation Element into the Land Use Element, which we believe will better guide architecturally compatible development. Since our previous feedback last spring, we note several revisions and submit the following feedback and recommendations. Additionally, we offer comments on the Draft EIR for your consideration.

The impact of affordable housing bonuses and development caps

The question of affordable housing bonuses complicates the evaluation of the impacts of the proposed development caps. Caps should be set so that the maximum acceptable densities, considering all their implications, will not be exceeded all or some calculated percentage of housing projects utilize the affordable bonuses. Given that the State's Density Bonus Law SB1818 allows for up to 35% in some cases, the factor of 17% used for the 2035 buildout projections is far too conservative, as stated in footnote 1 in Section 3 Project Description of the Draft EIR. Furthermore, this is contradicted in Policy 1.3 Development Caps, which states that the City's development caps for Fair Oaks/Orange Grove area do apply to affordable housing units. More clarity and illustration is needed to demonstrate the full potential impact of the Density Bonus on the development caps and where and how the additional development mandated for affordable housing is to be realized.

A7-1

4.3.1 – LOCATION AND LAND USE

Central District (page 4-4)

Although numerous historic and culturally important sites are mentioned in these paragraphs, the Central District has a particularly high concentration of historic districts and sites. Specific mention should be made of the Old Pasadena Historic District, Civic Center Historic District, Civic Center Financial Historic District, Pasadena Playhouse Historic District, as well as individual landmarks and historic sites. This area also includes Pasadena's first two public parks, Central Park and Memorial Park. The summary of land uses seems deficient here without a clearer description of these important items.

A7-2

PRESERVATION | ADVOCACY | EDUCATION

3. Response to Comments

General Plan Update DEIR March 23, 2015 Page 2	
<p>South Fair Oaks (page 4-5) This description should include the Glenarm Steam Plant and Electric Fountain (an historic monument) as well as the rest of the PWP complex, which is a major land use in the area. The presence of Art Center College of Design on South Raymond is also an important institutional/educational use and should be included.</p>	A7-3
<p>(page 4-6) – First paragraph The description of the Arroyo should include the fact that the Central and Lower Arroyo areas are listed on the National Register of Historic Places and that the Rose Bowl is a National Historic Landmark.</p>	A7-4
<p>Figure 4-1 High Quality Transit Areas... This title seems confusing (to the lay person at least). Why is “high quality” the descriptor? Unless this is a transportation term, it seems like “high intensity” would be a better title.</p>	A7-5
<p>4.3.4 CULTURAL RESOURCES (page 4-9) This general description is overall acceptable, however, in the last paragraph there are several corrections needed:</p> <ul style="list-style-type: none"> • The number of City-designated Landmark Districts should be corrected • It was omitted that there are three National Historic Landmarks in the City of Pasadena • The name of the Pasadena Freeway should be corrected to the Arroyo Seco Parkway 	A7-6
<p>(page 4-10) - First paragraph Only Craftsman (correct spelling) style bungalows are mentioned. There are also numerous and important Victorian-era buildings, Period Revival style buildings, and Modern buildings. Highlighting only one period or style does not represent the breadth and depth of Pasadena’s architectural legacy.</p>	A7-7
<p>4.3.8 Scenic Features and Visual Resources (page 4-12) This brief description does not include highly visible landmarks such as Pasadena City Hall, Castle Green, St. Andrew’s bell tower, and many historic neighborhoods (including Bungalow Heaven).</p>	A7-8
<p>4.3.9 Transportation and Traffic (page 4-12) Second paragraph – the correct name of the ARTS bus system is Pasadena Area Rapid Transit Systems, thus ARTS.</p>	A7-9
<p>5.1 AESTHETICS East Colorado (page 5.1-2) This description should include mention of the multiple distinctive historic buildings.</p>	A7-10
<p>Fair Oaks/Orange Grove (page 5.1-3) This description should include mention of many remaining historic residential properties.</p>	A7-11

3. Response to Comments

		General Plan Update DEIR March 23, 2015 Page 3
<p>South Fair Oaks (page 5.1.3) The end of this paragraph should include “as well as several important historic structures.”</p>		A7-12
<p>Table 5.1-1 (page 5.1-4 - 5) South Fair Oaks – Visual Resources Should be stated as Glenarm Power Plant <u>and</u> Electric Fountain.</p>		A7-13
<p>Northwest In addition to the Rose Bowl, Brookside Golf Course should be named as an historic resource, or the Arroyo Seco/Brookside Park Corridor should be identified as an historic resource as well as for its open space and landscaping.</p>		A7-14
<p>5.1.1 Regulatory Setting Design Commission (page 5.1-9) The description of the Design Commission’s authority should include its responsibility to serve as the Historic Preservation Commission for properties within the Central District.</p>		A7-15
<p>Visual Simulations The Visual Simulations are helpful in understanding what build-out at these key intersections might look like. If the specifications used to create these drawings do not include the additional percentages for local and state affordable housing bonuses, please add a dotted line or shaded area illustrating what additional height or massing would be allowed if the imagined projects included that additional square footage.</p>		A7-16
<p>Scenic Highways Element (page 5.1-48) Program 1-2: Should this read <u>Complete</u> Streets Concepts?</p>		A7-17
<p>5.1.4 Relevant General Plan Policies - Proposed Land Use Element (page 5.1-48) In general, these policy statements are well thought-out, direct and specific and Pasadena Heritage supports them. We have some specific recommended additions or changes as follows:</p>		
<p>Policy 3.1 High-Impact Uses (page 5.1-48) Suggest replacing the first word “Avoid” with “Prevent.”</p>		A7-18
<p>Policy 5.5 Civic Open Space (page 5.1-49) Suggest renaming this <u>Civic Center Open Space</u> (there could be other civic open spaces such as around the Glenarm Steam Plant Fountain). Add at the end of this section, “and demonstrate respect for the original Bennett Plan.”</p>		
<p>5.4 CULTURAL RESOURCES 5.4.3 Environmental Impacts (page 5.4-23) List of specific examples incorrectly states Pasadena Civic Center as a local Landmark District when in fact it is a National Register Historic District.</p>		A7-19

3. Response to Comments

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March 23, 2015
Page 4

Policy LU 8.5: Scale and Character of New Construction in Designated Landmark and Historic Districts (page 5.4-23)

Second paragraph listing of National Register Districts omits Pasadena Civic Center Financial District.

A7-20

5.4.4 Relevant General Plan Policies and Actions

Goal 8: Historic Preservation. (page 5.4-27)

Change the word “reminders” to “valued assets and important representations...”

Policy LU 8.4 Adaptive Reuse (page 5.4-27)

Reword as follows: “Encourage continued historic use(s) and support sensitive adaptive re-use...” The point is that the original use of a building is typically the most compatible with its design and construction. Adaptive re-use should be supported when original uses are no longer appropriate or feasible, but often requires greater change to an historic structure to accommodate the new use.

A7-21

Policy LU 8.6 Infrastructure and Street Design Compatibility (page 5.4-27)

Delete the word “be” in the second line.

Policy LU 8.9 Maintenance. (page 5.4-27)

Reword to read “Support, encourage, and enforce maintenance and upkeep of historic resources...” after Support

Policy LU 8.10: Enforcement (page 5.4-27)

Delete the “s” in the word fosters; should be “foster.”

Policy LU 14.1 Tourism and Hospitality (page 5.4-28)

Reword as follows: “Encourage the preservation of existing historic and cultural assets and encourage the creation of new ones that provide entertainment and tourism attractions for visitors and conventioners.”

5.5 GREENHOUSE GAS EMISSIONS

5.5.1.1 Regulatory Setting

Regulation of GHG Emissions on Local Level: City Green City Action Plan (page 5.5-13)

Add a new Action or add language to Action 4 that says: “encourage the retention of existing structures and foster the reclamation and re-use of building materials” since demolition is one of the greatest landfill contributors.

A7-22

NOISE

5.9.4 Relevant General Plan Policies (pages 5.9-32 - 34)

Objective 2

Policy 2a. Change the word “encourage” to “require”

Policy 2b. Change the word “encourage” to “require”

A7-23

Objective 6

Policy 6a. Change the word “encourage” to “require”

Policy 6c. Change the words “encourage limitations on” to “limit”

3. Response to Comments

General Plan Update DEIR
March 23, 2015
Page 5

5.9.7 Mitigation Measures (pages 5.9-36 - 37)

Impact 5.9-3

The mitigation measures described should all include the requirement of a monitoring plan with inspections to be performed by qualified professionals on a regular basis during the construction period. This is critically important because plans can be submitted and approved but monitoring must take place on a regular basis during the construction process or there is no guarantee that the agreed-upon mitigation measures will be implemented. There have been several examples of excavation near historic buildings where unforeseen conditions were found or vibration had unanticipated negative consequences that needed to be addressed immediately.

A7-24

7.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Based on the information provided in the Alternatives Analysis, we agree that the "Central District, South Fair Oaks and Lincoln Ave. Alternative" is the environmentally superior alternative.

A7-25

Thank you for this opportunity to comment.

Sincerely,



Susan N. Mossman
Executive Director



Jesse Lattig
Preservation Director

3. Response to Comments

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3. Response to Comments

A7. Response to Comments from Pasadena Heritage, dated March 23, 2015.

A7-1 The City appreciates Pasadena Heritage comments on the quality of the analysis and Land Use Element. The commenter provides feedback and recommendations on the General Plan Update and EIR, which are addressed in the following responses.

The response to the comment related to the State's Density Bonus Law (SB 1818) is provided in Section 2.2, *State Density Bonus Law*. The City of Pasadena determined the number of affordable housing units that could be developed based on historical trends in the City. The City calculated the number of affordable housing units that have been constructed since 2005, took an average of additional density bonus units constructed per project, and applied that percentage (17 percent) of potential affordable units to the proposed General Plan Update development caps. Using the past 10 years of data to project a reasonable and fact-based potential number of future affordable units provides an accurate methodology for analysis and is not far too conservative as the commenter suggests.

A7-2 Subsection 4.3.1 of Chapter 4 has been revised to reference the historic districts and important sites mentioned by the commenter.

- **Central District.** Pasadena's Central District is the City's urban core and includes downtown Pasadena, Old Pasadena, the Civic Center/Midtown area, and the Playhouse District. Colorado Boulevard, which runs east-west through the Central District, is one of the region's premier retail destinations. The specific plan area features numerous historic and culturally important sites, including City Hall, ~~and the Pasadena Playhouse, Central Park, and Memorial Park.~~ Historic districts include the Old Pasadena, Pasadena Civic Center, Civic Center-Financial, and Pasadena Playhouse historic districts. The Central District is a dense, vibrant, and walkable mix of commercial, residential, and civic land uses. It is divided into seven subdistricts in the Central District Specific Plan.

In general, this subsection is meant to describe Pasadena's land use pattern, not offer an exhaustive inventory of the land uses found in each area of the City. Additional discussion of aesthetic and cultural resources can be found in Sections 5.1 and 5.4 of the DEIR, respectively.

A7-3 Subsection 4.3.1 of the DEIR has been revised, as follows, to include the facilities and sites mentioned by the commenter:

- **South Fair Oaks.** The South Fair Oaks Specific Plan area is south of downtown Pasadena between South Pasadena Avenue to the west and South Arroyo Parkway (SR-110) to the east. The area is dominated by industrial uses and Huntington Hospital. However, it also features the Glenarm Power Plant with the historic

3. Response to Comments

Electric Fountain, and Art Center College of Design's south campus on South Raymond Avenue.

A7-4 Subsection 4.3.1 of the DEIR has been revised as requested:

Unlike most of the City, which is dominated by urban development, the western portion of Pasadena is characterized by a sequence of open space areas that are oriented to the Arroyo Seco waterway. From north to south, they include Hahamongna Watershed Park, Central Arroyo Park (including Brookside Park), and Lower Arroyo Seco Park. Recreational and cultural amenities include the Brookside Golf Course, Rose Bowl stadium, Kidspace Children's Museum, and Rose Bowl Aquatics Center. As with the Arroyo Seco on the west side of the City, Eaton Wash in eastern Pasadena is a seasonal waterway that drains runoff from the San Gabriel Mountains to lower elevations in the City. The Central and Lower Arroyo areas are largely part of the Pasadena Arroyo Parks and Recreation District, which is listed on the National Register of Historic Places under the Cultural Landscape category. In addition, the Rose Bowl is a National Historic Landmark.

A7-5 Please refer to Section 4.2.2.2 of the DEIR on Page 4-3, which describes "High Quality Transit Areas." This is a defined term used in the Southern California Association of Government's 2012 Regional Transportation Plan/Sustainable Communities Strategy.

A7-6 The commenter is correct in noting that the following paragraph omits mention of Pasadena's National Historic Landmarks. A review of the federal database for such resources found that Pasadena has three National Historic Landmarks within the City (the Gamble House, Hale Solar Observatory, and Rose Bowl) and two just outside Pasadena on the Jet Propulsion Laboratory campus (the Space Flight Operations Facility and Twenty-Five-Foot Space Simulator).

Subsection 4.3.4 of the DEIR has been modified, as follows, to 1) mention the three National Historic Landmarks within Pasadena, 2) refer to the Arroyo Seco Parkway by its correct name, 3) correctly spell Craftsman, and 3) clarify that historic buildings in Pasadena represent a wide diversity of architectural styles:

There are three known prehistoric resources in Pasadena, including two sites and a trail. There are also two historic archaeological sites, including an early 20th Century tourist camp and a trash deposit possibly associated with the San Rafael Ranch. Existing designated historic resources in the City include 131 resources listed on the National Register of Historic Places, including ~~2046~~ National Historic Districts and 3 National Historic Landmarks (NPS 2013); 1 State Point of Historical Interest; 2 State Historic Landmarks (OHP 2013); numerous City-designated landmarks, memorials, and monuments (Pasadena 2010); and ~~2047~~ City-designated Landmark Districts (Pasadena 2010). Part of SR-110, the Arroyo Seco Parkway Pasadena Freeway, is designated a National Scenic Byway (FHWA 2013). The City is well

3. Response to Comments

known for its large inventory of historic buildings, which include historic estates of early 20th Century business magnates, hundreds of Craftsman-style bungalows, and numerous private and public buildings of note representing a wide diversity of architecture styles, including Victorian-era buildings, Period Revival style buildings, and Modern buildings.

A7-7 See above response and associated DEIR revisions. Subsection 4.3.4 of the DEIR has been modified to clarify that historic buildings in Pasadena represent a wide diversity of architectural styles. Pasadena's cultural resources are discussed in more detail in Section 5.4 of the DEIR. Chapter 4 of the DEIR is intended to provide a brief overview of the City's existing environmental setting; no additional detail regarding cultural resources is necessary.

A7-8 Subsection 4.3.8 has been modified, as follows, to mention the specific resources indicated by the commenter:

The City of Pasadena affords a variety of views of scenic landscapes and built environments. The San Gabriel Mountains, near the north City boundary, dominate the skyline from most of the City. The San Rafael Hills are along the western City boundary, and the Verdugo Mountains are further to the west. In addition, the Arroyo Seco corridor and Eaton Canyon traverse the western and eastern portions of the City, respectively. The City also offers scenic views of distinct architecture in the built environment, such as the Old Pasadena Historic District, Pasadena City Hall, Castle Green, St. Andrew Catholic Church bell tower, and Bungalow Heaven.

The above paragraph is intended to list only a few examples of how the City's built environment offers scenic views. Section 5.1, *Aesthetics*, of the DEIR provides a detailed analysis of the City's scenic vistas, visual resources, and aesthetic character.

A7-9 The full name of the Pasadena ARTS has been corrected as requested in Section 4.3.9 as follows:

The City is served by numerous bus lines operated by Pasadena ARTS (Pasadena Area Rapid Transit System), Foothill Transit, and Metro. Other alternative modes of transportation in the City include services offered by the Los Angeles Department of Transportation (e.g. park-and-ride lots); Dial-A-Ride; the Gold Line (light rail line that links Pasadena to Union Station in Los Angeles); the LAX FlyAway bus service from Pasadena to LAX; and the City of Sierra Madre Gateway Coach. The Gold Line light-rail line (Metro Rail Service Line 804) extends north-south through the southwestern part of the City and continues eastward in the median of I-210, terminating near the eastern City boundary. The City also provides ample opportunities for bicycling via a network of bikeways, bicycle parking, links to transit, and other accommodations, as detailed in the City's Bicycle Transportation Plan (adopted in 2000 and last updated in 2011).

3. Response to Comments

A7-10 The bullet mentioned by the commenter has been modified as requested in Section 5.1 as follows:

- **East Colorado.** This area is a three-mile-long corridor extending eastward from Catalina Avenue to the eastern City boundary. It includes Allen Avenue from Colorado Boulevard to the Gold Line station at I-210. East Colorado Boulevard features a broad variety of commercial land uses. The visual character of the corridor varies widely, including auto-oriented areas with deficient pedestrian infrastructure and areas with wide sidewalks and businesses that front the sidewalk. Colorado Boulevard offers substantial eastward and westward views through the Specific Plan area and Pasadena. The area also includes multiple distinctive historic buildings, including the Holliston Avenue Methodist Church, H.G. Loud Auto Building, Howard Motor Company Building, Kindel Building, Saga Motor Hotel, and other auto-oriented uses associated with historic Route 66.

A7-11 The bullet mentioned by the commenter has been modified as requested in Section 5.1 as follows:

- **Fair Oaks/Orange Grove.** The Fair Oaks/Orange Grove Specific Plan corridor encompasses approximately 171 acres in northwest Pasadena and is considered the “gateway” to northwest Pasadena. The specific plan divides the area into the La Pintoresca Neighborhood Corridor, Robinson Park, and Renaissance Commercial districts. All three subdistricts feature residential and neighborhood-serving commercial land uses. The Robinson Park district also features an important cluster of civic and community-serving institutions. The area’s character is varied and has many historic residential properties.

A7-12 The bullet mentioned by the commenter has been modified as requested in Section 5.1 as follows:

- **South Fair Oaks.** The South Fair Oaks Specific Plan area is south of downtown Pasadena between South Pasadena Avenue to the west and South Arroyo Parkway (SR-110) to the east. The area is dominated by industrial uses and Huntington Memorial Hospital. Interspersed between industrial uses are commercial and public uses of varying building types and styles, giving the area an eclectic appearance and character. This varied visual environment includes some of the City’s more adventurous and atypical architecture, as well as several important historic structures.

3. Response to Comments

A7-13 Table 5.1-1 has been modified as requested:

South Fair Oaks	<ul style="list-style-type: none"> • Industrial/warehouse buildings • Glenarm Power Plant <u>and Electric Fountain</u> 	<ul style="list-style-type: none"> • Unique visual character • Historic resource
-----------------	--	--

A7-14 In Section 5.1, the bullet indicated by the commenter has been modified, as follows, to mention the Arroyo Seco’s historic value:

- **Northwest Pasadena.** Outside of the Lincoln Avenue Specific Plan area, this section of Pasadena is characterized by a suburban, residential character. The area is bisected from north to south by the portion of the Arroyo Seco that contains the Rose Bowl, Brookside Golf Course, and other recreational amenities. The Rose Bowl, golf course, and Arroyo Seco corridor as a whole have historic value in addition to their recreational and aesthetic value. East of the Arroyo Seco and west of I-210 are residential neighborhoods that are mostly oriented to an orthogonal street grid. This grid and the regular placement of street trees give the area an orderly and modest small-town aesthetic. West of the Arroyo Seco are residential neighborhoods featuring larger homes on larger lots, many in the San Rafael Hills. The topography, scenic vistas, and mature tree canopy distinguish these homes and neighborhoods from other areas of the city.

A7-15 In Section 5.1.1, the bullet mentioned by the commenter has been modified as requested:

- **Design Commission (Chapter 2.80).** This section of the Municipal Code establishes the City’s Design Commission. The Design Commission is tasked with fulfilling the Pasadena City Council’s declaration that the “achievement of quality in the architecture and urban design of the City is required in the interest of the prosperity, social and cultural enrichment, and general welfare of the people” (Pasadena 2014). The Commission is given the authority to develop City policies and standards related to community design, review development and redevelopment projects regarding aesthetic concerns, and make recommendations regarding environmental review documents.

A subsection of Chapter 2.80 establishes the City’s Urban Forestry Advisory Committee. The code gives authority to the Design Commission to delegate review of matters pertaining to trees to the Urban Forestry Advisory Committee. The Design Commission also serves as the Historic Preservation Commission for properties within the Central District.

3. Response to Comments

- A7-16 Refer to Section 2.2, *State Density Bonus Law*. In addition, given the small number of SB 1818 concessions granted in the City and the unique circumstances that must be analyzed for a particular project and site to identify what concession or waiver of development standards would apply, it is not feasible to incorporate these assumptions on to the visual simulations.
- A7-17 This language is taken from the adopted Scenic Highways Element and should not be changed.
- A7-18 This comment relates to the land use policies proposed by the General Plan Update, not the potential environmental impacts of the project. These suggested changes are noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.
- A7-19 Analysis under Impact 5.4-1 has been modified, as follows, to correct the stated status of the Pasadena Civic Center as a National Register Historic District.

As shown in Table 5.4-3, there are a number of landmark and historic districts within and adjacent to the specific plan areas. Careful consideration of site specific development must occur within and adjacent to these districts to ensure that there are no conflicts or impacts to the resource's immediately surrounding area. Specific examples include the potential for new commercial and mixed uses near the Bungalow Heaven and Historic Highlands Landmark Districts; medium mixed use, high density mixed use, and institutional classifications in the Pasadena Playhouse Districts; medium mixed use, high density mixed use, institutional, and high density residential in the Pasadena Civic Center National Register Historic ~~Landmark~~ District; and medium density residential uses in the Ross Grove Landmark District.

- A7-20 Analysis under Impact 5.4-1 has been modified as requested:

In addition to compliance with Policy LU 8.5, new development would be required to comply with the City's Design Guidelines for Historic Districts, which are based on the Secretary of the Interior's Standards for Historic Preservation. For example, areas along North Lake Avenue adjacent to the Bungalow Heaven National Register District and the Historic Highlands Landmark District would allow for Low Mixed Use (1-1.0 FAR), Low-Medium Mixed Use (0-1.75 FAR), and Low Commercial (0-1.0 FAR). Although the proposed Land Use Diagram would allow new uses with specific FARs adjacent to these landmark and historic districts, new development in this area would still need to comply with the North Lake Specific Plan and development standards (e.g., height, massing, and setback limitations) in Municipal Code Section 17.34.040 and the Urban Design, Sense of Place, and Architectural policies in the land use element. New development in the Pasadena Playhouse, Civic Center-Financial, and Pasadena Civic Center National Register Districts would be required to comply with the Central District Specific Plan

3. Response to Comments

and Design Guidelines for Historic Districts. Adherence to these development standards and design guidelines would ensure that infill development would maintain the character and context of the area, incorporate high quality architectural design, and be compatible with adjacent historical structures. Elements of the historic resources and landmarks that are character defining and convey the resources' significance, including all seven aspects of the resources integrity, would not be altered.

- A7-21 This comment relates to the land use policies proposed by the General Plan Update, not the potential environmental impacts of the project. These suggested changes are noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.
- A7-22 The commenter recommends changes to the Pasadena Green City Action Plan. Since this plan was adopted in 2006, the language cannot be changed as part of this DEIR process. However, this comment is noted and will be provided to the decision makers for consideration.
- A7-23 The Noise Element has been adopted and is not being updated as part of the proposed General Plan Update. Therefore, the changes to Noise Element policies are not being contemplated at this time. Nonetheless, this comment is noted and will be provided to the decision makers for consideration.
- A7-24 Pursuant to CEQA Guidelines Section 15097, the City will be required to adopt a Mitigation Monitoring and Reporting Program for the Pasadena General Plan Update.
- A7-25 The commenter states that they agree with the DEIR analysis that the Central District, South Fair Oaks, and Lincoln Avenue Alternative is the environmentally superior alternative. No further response is necessary.

3. Response to Comments

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3. Response to Comments

LETTER A8– Playhouse District Association (3 pages)



Culture, Commerce and Community in the Heart of Pasadena

March 24, 2015

Vicrim Chima
General Plan Manager
Planning Community Development
City of Pasadena
175 N Garfield Avenue
Pasadena, CA 91109

RE: General Plan Update Draft EIR

Dear Mr. Chima:

As City Council moves toward a final draft General Plan Update, the Playhouse District Association (PDA) continues to support future growth and development in the Central District to assure that Pasadena continues to be an economically strong city through 2035, with a great Central District where people can live and work in a walkable area that is the hub of Pasadena. This letter provides the city with comments based upon our study of the Draft EIR.

A8-1

The PDA finds that the Central District development levels associated with three Draft EIR alternatives are sufficient for the future:

- Proposed Project
- Efficient Transportation
- Reduced Air Quality and Noise Impact

Residential Positive Impacts: These three alternatives provide adequate residential growth of approximately 6,000 units to reduce the vehicles miles traveled by building density where there are over 80,000 existing jobs. The compact nature of the Central District's amenities will expand the livability of the area with shops, restaurants, services and entertainment steps away from one another which will keep the local dollars in Pasadena. The new residents will also benefit from the Central District's transit hub which is served by the Gold Line, Metro Buses, Foothill Transit, and ARTS buses. The Draft EIR alternatives discussion substantiates these benefits for the City.

A8-2

Commercial Development Positive Impacts: Pasadena's economic vitality is linked to the ability to accommodate for infill development through 2035. These three alternatives provide for potential development capping at just over 3.8 million square feet of non-residential development. With over 1 million square feet of non-residential square feet of development in the pipeline it is imperative to provide 20 years of potential growth. The infill development will enhance the walkability of the area by creating new commercial establishments in Pasadena's commercial center, build space for new jobs, and provide the City more economic activity. The Draft EIR substantiates that these three alternatives result

A8-3

PDA GP EIR Comments

Page 1

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www.playhousedistrict.org • www.facebook.com/playhousedistrict

3. Response to Comments

<p>in lower Vehicle Miles Traveled (VMT) per capita than the remaining No Project alternative and the alternative that proposes reduced growth in the Central District, South Fair Oaks and Lincoln Avenue.</p>	<p>A8-3 cont'd</p>
<p>If compact development under any of the growth scenarios is to work from an environmental standpoint, special focus should be given in the General Plan to "walkability".</p>	<p>A8-4</p>
<ul style="list-style-type: none"> • Identify and organize all policies that relate to walkability and to pedestrian improvements that are proposed in the current General Plan Update and to create a new policy section entitled "Walkability" which includes a detailed list of policies. • Develop a map to show emphasis areas for "walking" showing existing and planned compact areas of the city that are multi-use and multi-density and that are most conducive to walkability. • Implementation measures should be developed, including pedestrian improvements, in order to carry out walkability policies. 	<p>A8-4</p>
<p>Significant Impact: There are four areas of Significant Impact: Air Quality, Green House Gas Emissions, Noise, and Transportation and Traffic. The Draft EIR finds that the "environmentally superior" alternative is the Central District, South Fair Oaks and Lincoln Avenue alternative -- despite the fact that the Proposed Project, Efficient Transportation and Reduced Air Quality and Noise alternatives all result in lower VMT per capita and very similar impacts stated in the draft EIR. The Central District, South Fair Oaks and Lincoln Avenue alternative does not eliminate the significant impact as stated in the Draft EIR:</p>	<p>A8-5</p>
<ul style="list-style-type: none"> • Air Quality: This alternative would reduce some air quality impacts, but not eliminate any significant impacts. • Green House Gas Emissions: Although there would be a reduction in GG emissions overall, impacts would remain significant and unavoidable. Similar to the project, this alternative would result in a reduction of GHG emissions per service population, but there would be a substantial increase in GHG emissions compared to existing conditions. Additionally, community-wide GHG emissions would not meet the long-term GHG reductions goal under Executive Order S-03-05. • Noise: Overall, this alternative would reduce short-term construction-related and long-term noise impacts. However, this alternative would not eliminate the construction-related significant unavoidable impacts of the proposed project. • Traffic and Transportation: Overall, impacts are the same as the proposed project. Impacts related to CMP mainline segments and arterial intersections would remain significant and unavoidable. 	<p>A8-5</p>
<p>Although not considered an environmental impact, and therefore not discussed in the Draft EIR, reduced growth in the Central District, South Fair Oaks and Lincoln Avenue Alternative will also not provide the economic support the city needs which are listed in the General Plans Objectives.</p>	<p>A8-6</p>
<p>In contrast to the Draft EIR conclusion, the PDA recommends that the three alternatives that provide for compact growth in the Central District are all superior overall choices because they meet all 11 Objectives of the General Plan Update. The No Project Alternative and reduced growth in the Central</p>	<p>A8-7</p>
<p>PDA GP EIR Comments</p>	<p>Page 2</p>

3. Response to Comments

District, South Fair Oaks and Lincoln Avenue fail to meet more than half of the City's adopted General Plan Update Objectives, including the following objectives important to all residents and all areas within the City:

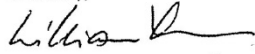
- **Objective 1:** Provide higher density development away from residential neighborhoods and into the Central District, Transit Villages (South Fair Oaks) and Neighborhood Villages (Lincoln Avenue)
- **Objective 2:** Reduce vehicle miles traveled for the City and region by providing a diverse housing stock, job opportunities and exciting districts with commercial and recreational uses, and transit opportunities in the Central District, Transit Villages and Neighborhood Villages
- **Objective 5:** Achieve economic vitality and fiscal responsibility by providing jobs, services, revenues and opportunities with a diverse economic base
- **Objective 6:** Establish goals and policies to create a socially, economically and environmentally sustainable community
- **Objective 8:** Incorporate new goals, policies, and programs that balance multiple modes of transportation and meet the requirements of the Complete Streets Act
- **Objective 9:** Reduce greenhouse gas emissions and encourage walking, biking, transit and other alternatives to motor vehicles consistent with AB 32, SB 375 and SB 743.
- **Objective 10:** Reconcile General Plan buildout projections with regional and sub-regional estimates for growth creating consistency with SCAG
- **Objective 11:** Incorporate housing sites identified in the adopted Housing Element with the Land Use Element

A8-7
cont'd

We urge the City Council to recognize the pivotal role that Central District growth plays in realizing both the City's environmental and economic goals, and to select a final General Plan alternative that provides 6,000 units and at least 3.8 million square feet of non-residential capacity in the Central District. The Central District, South Fair Oaks and Lincoln Avenue alternative should be eliminated since there is *failure to meet most of the project objectives, and for its inability to avoid significant environmental impacts as per Guidelines Sec. 15126.6[c]*. In fact, the PDA's position is that this alternative does not meet 8 out of the 11 project objectives.

A8-8

Sincerely,



William Chu
Chair



Erlinda Romo
Executive Director

3. Response to Comments

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3. Response to Comments

A8. Response to Comments from Playhouse District Association, dated March 24, 2015.

- A8-1 The Playhouse District Association (PDA) supports future growth and development in the Central District to ensure a walkable and economically strong City. Responses to the comments on the DEIR are provided below.
- A8-2 The PDA supports the growth assumed in the Central District for the General Plan Update, the Efficient Transportation Alternative, and the Reduced Air Quality and Noise Impact Alternative. No further response is necessary.
- A8-3 The PDA is correct that all of the alternatives analyzed show lower VMT and VMT per capita than the No Project/Adopted General Plan Alternative. The Central District, South Fair Oaks, Lincoln Avenue Alternative shows a reduction in VMT but a slight increase in VMT per capita compared to the proposed project and the Efficient Transportation Alternative. No further response is necessary.
- A8-4 Following adoption of the General Plan Update, the City will implement measures to support the general plan goals and policies. References to pedestrian improvements, in addition to those provided for in the City's Pedestrian Plan adopted in 2006, may be incorporated. The City's pedestrian metric requires that future development analyze pedestrian impacts. Additionally, pedestrian improvements will be included as part of the update to the City's transportation fee.
- Please refer to Figures 18 and 20 in the Transportation Analysis Report (Appendix D of the FEIR) for maps showing the quality of pedestrian accessibility under existing and proposed conditions.
- The suggestion to create a new policy section entitled "Walkability" is a land use policy issue that will be forwarded to the decision makers for their consideration.
- A8-5 The California Environmental Quality Act (CEQA) requires the lead agency to select an environmentally superior alternative (to the proposed project). The proposed project is not one of the options that can be selected as the environmentally superior alternative. For the reasons stated in Section 7.8 of the DEIR, the Central District, South Fair Oaks, and Lincoln Avenue Alternative would result in reduced impacts in the greatest number of categories of significant effects. The commenter is correct that this alternative does not eliminate any significant and unavoidable adverse effects of the proposed project. Additionally, the commenter is correct that the Efficient Transportation Alternative would also reduce many of the proposed project's significant effects. Comments on the prepared alternative will be forwarded to the decision-making body (City Council) for their consideration.
- A8-6 The commenter's opinion regarding the inadequacy of the economic support provided by the Central District, South Fair Oaks and Lincoln Avenue Alternative is duly noted.

3. Response to Comments

The City prepared an economic analysis under a separate process apart from the CEQA process. The economic analysis will be available to the decision makers when deciding whether to adopt the General Plan and will support the Findings of the Final Environmental Impact Report, as necessary.

- A8-7 The DEIR must first select the alternative that is environmentally superior to the proposed project. However, once the environmentally superior alternative is selected, the decision-making body (City Council) must decide whether to accept or reject that alternative. Among the factors that may be used to reject an alternative is the inability to meet the project objectives. The commenter's opinion that the No Project Alternative and the Central District, South Fair Oaks, and Lincoln Avenue Alternative would not meet certain project objectives to the same degree as the proposed General Plan Update or other analyzed alternatives is duly noted.
- A8-8 The comment regarding the pivotal role of growth in the Central District, along with the commenter's opinions and recommendations will be forwarded to the City Council for consideration of the project merits.

3. Response to Comments

LETTER R1 –Joyce Dillard (1 page)

Chima, Vicrim

From: Joyce Dillard <dillardjoyce@yahoo.com>
Sent: Tuesday, March 24, 2015 4:34 PM
To: Chima, Vicrim
Subject: Comments to DEIR Pasadena General Plan Update due 3.24.2015

YOU STATE:

4.2.2.3 REGIONAL WATER QUALITY CONTROL BOARD

The City of Pasadena and its sphere of influence are in the jurisdictional area of the Los Angeles Regional Water Quality Control Board (LARWQCB). Requirements for avoiding or minimizing stormwater pollution from operation of development projects are in the LARWQCB's Order No. 01-182, Waste Discharge Requirements for Municipal Storm Water and Urban Runoff Discharges in the County of Los Angeles ("MS4 Permit"), most recently amended on April 14, 2011. MS4 permit requirements meet the National Pollution Discharge Elimination System (NPDES) regulations authorized by Section 402 of the Clean Water Act. The City of Pasadena is a co-permittee on the MS4 Permit and has adopted a Standard Urban Stormwater Mitigation Plan ordinance (Municipal Code Chapter 8.70) to ensure new developments comply with the MS4 Permit.

R1-1

COMMENTS:

We find a reference to the LA Regional Board MS4 permit to be incorrect. The correct permit is ORDER NO. R4-2012-0175 with the terms and responsibilities of the permit changed.

Please address in responsibility/plans to increase water supply to the Los Angeles River from the Arroyo Seco. LA River Ecosystem Feasibility Study with the Arbor Alternative and the City of Los Angeles River Revitalization Plans demand more water into the river.

R1-2

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

3. Response to Comments

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3. Response to Comments

R1. Response to Comments from Joyce Dillard, dated March 24, 2015.

R1-1 Chapter 4, *Environmental Setting*, of the DEIR has been modified to be consistent with revisions suggested by the commenter:

4.2.2.3 REGIONAL WATER QUALITY CONTROL BOARD

The City of Pasadena and its sphere of influence are in the jurisdictional area of the Los Angeles Regional Water Quality Control Board (LARWQCB). Requirements for avoiding or minimizing stormwater pollution from operation of development projects are in the LARWQCB's Order No. ~~04-182~~ R4-2012-0175, Waste Discharge Requirements for Municipal Separate Storm Sewer System Water and Urban Runoff Discharges in the County of within the Coastal Watersheds of Los Angeles County ("MS4 Permit") and National Pollution Discharge Elimination System (NPDES) Permit No. CAS004001, most recently amended on April 14, 2011. MS4 permit requirements meet the ~~National Pollution Discharge Elimination System (NPDES)~~ regulations authorized by Section 402 of the Clean Water Act. The City of Pasadena is a co-permittee on the MS4 Permit and has adopted a Standard Urban Stormwater Mitigation Plan ordinance (Municipal Code Chapter 8.70) to ensure new developments comply with the MS4 Permit.

Information and analysis in Section 5.7, *Hydrology and Water Quality*, of the DEIR references the correct water quality permit.

R1-2 The commenter refers to the Area with Restoration Benefits and Opportunities for Revitalization (ARBOR) discussed in the Los Angeles River Ecosystem Restoration Integrated Feasibility Report prepared by the U.S. Army Corps of Engineers in 2013. Subsection 5.7.1.3 of the DEIR discusses the ongoing collaborative effort by multiple agencies to increase water in the Arroyo Seco, which discharges into the Los Angeles River.

As disclosed in Section 5.7, *Hydrology and Water Quality*, of the DEIR, buildout of the General Plan Update is anticipated to increase the amount of impervious surfaces in the City, which would increase surface water flows to drainage systems in the City, and ultimately to the Arroyo Seco and Los Angeles River. For this reason, and because the General Plan Update would not alter the course of the Arroyo Seco, result in significant erosion or siltation, or propose new development in the vicinity of the waterway, implementation of the proposed project would not conflict with regional goals to increase flow in the Los Angeles River. Furthermore, policies that address the health of the Los Angeles River watershed are included in the adopted Open Space and Conservation Element and in the proposed Land Use Element. In particular, Policy LU 10.11 seeks to "preserve and maintain the natural character of the Eaton Canyon Corridor and the Arroyo Seco as self-sustaining healthy ecosystems."

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3. Response to Comments

LETTER R2 –Laura Ellersieck (1 page)

Chima, Vicrim

From: Laura Ellersieck <eewna@earthlink.net>
Sent: Wednesday, January 28, 2015 10:22 PM
To: Chima, Vicrim
Subject: Draft Land Use Element has wrong street name

Page 32, East Pasadena, refers to "Electric Avenue".

There is no such place. The name of the street is "Electronic Drive".

"Electronic Drive" is a historically significant name. The original development on the north side was Burroughs Corporation and on the south side was Bell & Howell.

R2-1

3. Response to Comments

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3. Response to Comments

R2. Response to Comments from Laura Ellersieck, dated January 28, 2015.

R2-1 The DEIR makes no reference to Electric Avenue. However, the Land Use Element will be revised accordingly.

3. Response to Comments

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3. Response to Comments

LETTER R3 – Alon Friedman (1 page)

Chima, Vicrim

From: Alon Friedman <alonfriedman3159@sbcglobal.net>
Sent: Thursday, February 19, 2015 8:58 AM
To: Chima, Vicrim
Subject: comment to proposed plans

Hi Vikram,

Alon Friedman. I think we have met before when you were with design historic.

I wanted to ask if in all the proposed general plan changes, there is anything specifically addressing the issue of bicycle safety ie with regard to removing hazardous things on roadways which can cause harm to cyclists.

For example, the County bike plan talk about storm grates, and how the design of parallel bar grates are extremely hazardous to cyclists and should be changed out and for new work bie safe designs be used.

R3-1

See link below page F74

<http://dpw.lacounty.gov/pdd/bike/docs/bmp/Appendix%20F.pdf>

I understand the plans only are in the City proper, however it seems that if the goal is to encourage cycling the issue of safety should clearly be spelled out.

Thank you

3. Response to Comments

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3. Response to Comments

R3. Response to Comments from Alon Friedman, dated February 19, 2015.

R3-1 The Pasadena General Plan Update DEIR evaluated the impacts of the Mobility Element and a Transportation Analysis Report was prepared to analyze, among other issues, the quality of bike facilities citywide. The DEIR did not analyze to the level of detail of analyzing parallel bar grates in the roadway as a safety hazard. However, the City is in the process of updating its Bicycle Transportation Action Plan, which addresses the bicycle network and safety throughout the City. A draft plan is available on the City's website. Suggestions to improve bicycle safety will be forwarded to decision-making body (City Council) during consideration of the project.

3. Response to Comments

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3. Response to Comments

LETTER R4 – Lonnee Hamilton (3 pages)

Chima, Vicrim

From: Lonnee Hamilton <lonneeh@gmail.com>
Sent: Sunday, February 08, 2015 10:29 AM
To: Chima, Vicrim
Cc: Anthony Palazzo
Subject: Effect of Rose Bowl needed for EIR
Attachments: swap meet traffic 2.8.15.JPG.JPG; 10am swap meet traffic 2.8.15.JPG

I am a resident at 890 Seco Street in Pasadena, and due to the amount of traffic and air pollution generated by Rose Bowl events, particularly on my street, it would be reasonable to require a study focused specifically on Rose Bowl events.

In addition, what needs to be studied is whether the Swap Meet events are actually displacement events and should be counted as such.

Attached are photos taken at 10am at today's Swap Meet. As you can see, the street is backed up to the 210 Freeway.

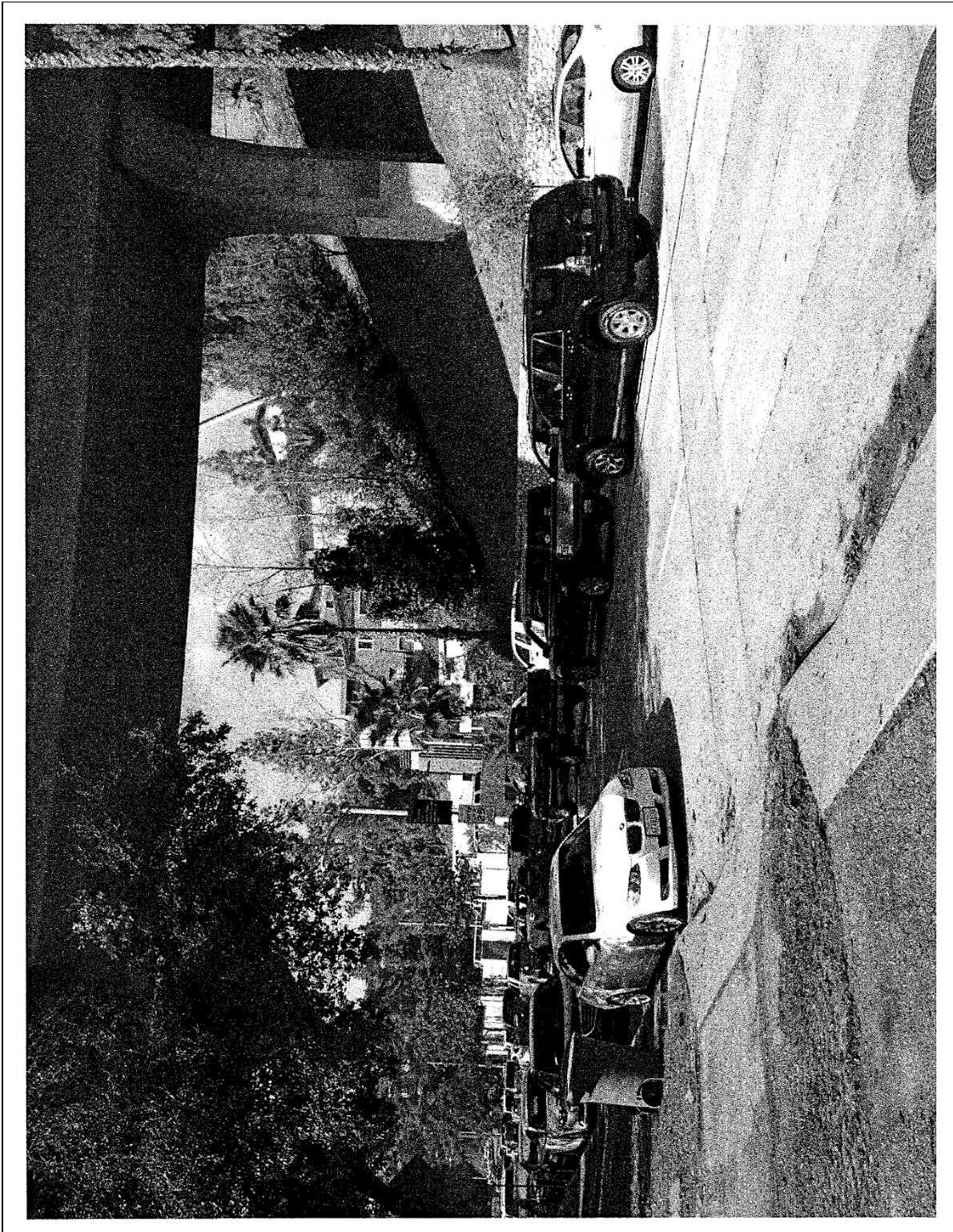
For more information on the effect of Rose Bowl traffic and air quality, please go to:
<http://www.secostreet.com/#!/about/ceu8>

Thank you,

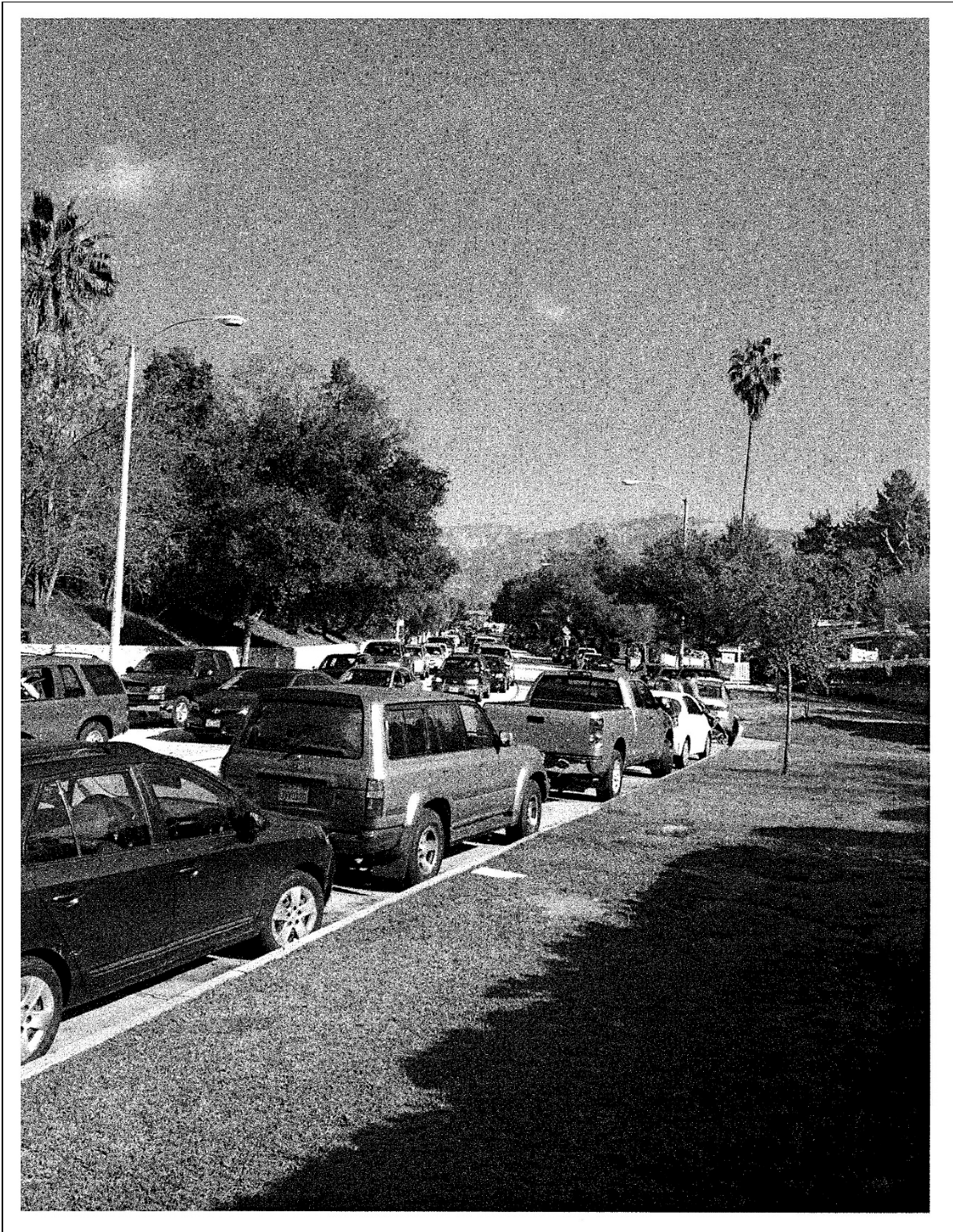
Lonnee Hamilton
890 Seco Street
Pasadena, CA 91103
(626) 755-5502

R4-1

3. Response to Comments



3. Response to Comments



3. Response to Comments

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3. Response to Comments

R4. Response to Comments from Lonnee Hamilton, dated February 8, 2015.

R4-1 The proposed General Plan Update does not include changes to the amount or type of events to be held at the Rose Bowl. Therefore, detailed traffic and air pollution studies associated with Rose Bowl events, including swap meets, are not appropriate for the programmatic EIR prepared for the General Plan Update. Citywide air quality, including impacts of the proposed project, is discussed in Section 5.2, *Air Quality*, of the DEIR. Traffic impacts are analyzed in Section 5.13, *Transportation and Traffic*. Because the traffic study and EIR provide program-level analysis for the City as a whole, traffic congestion is studied at key highway segments and roadway intersections identified by the Los Angeles County Congestion Management Program (CMP).

3. Response to Comments

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3. Response to Comments

LETTER R5 –Richard Hogge (2 pages)

Chima, Vicrim

From: richard@tremolocreative.com
Sent: Tuesday, February 10, 2015 5:50 PM
To: Chima, Vicrim
Subject: General Plan Update

Hello,

I'm a resident of Pasadena, and saw that you are accepting comments for the EIR of the city's general plan update.

R5-1

I live in Madison Heights, with my wife, near the Fillmore gold line stop. We both fully support more mixed use, creative offices, and mini-parks, as outlined in the South Fair Oaks district plan. We also support the addition of bike lanes and pedestrian improvements to the city (at large, and in our neighborhood.)

The plan seems to identify walking, cycling and mass transit as modes of travel the city would like to encourage. With that in mind, I have a couple of concerns that I don't see mentioned:

1) Can anything be done to improve the traffic signal syncing for pedestrians when crossing Arroyo Parkway to access the gold line stops?

A) Why make pedestrians push a button to cross at any of the intersections directly surrounding the train stops? To me, it makes sense to just give pedestrians a default green hand in locations like this, where foot traffic is a given. Otherwise, I often find myself jaywalking because, although I clearly have the right of way, the hand signal stays red if you don't get to the light and tap it before the light changes (and I don't see the sense in sitting through two light cycles, and possibly missing the train.)

R5-2

B) When the trains roll by at California and Del Mar, vehicles are often stopped in all directions at the adjacent intersections, a block over in each direction. Why not sync the pedestrian hand signals to let pedestrians cross the street at Arroyo Parkway and Raymond, instead of sitting through an additional light cycle while no cars are moving?

2) Can anything be done to improve bicycle access to Old Pasadena from the surrounding western neighborhoods?

A) Marengo has great bike lanes in Madison Heights, as well as bike lanes north of the 210. However, they don't connect through Old Pasadena. Why not bridge this small gap with a short road diet, and connect two of Pasadena's residential neighborhoods to the city's main civic, shopping and entertainment district?

R5-3

B) Raymond Avenue has bike lanes north of the 210, and what seems to be a lot of underutilized road space south of there (in my experience, congestion is quite rare... even at rush hour.) Why not connect the northern lanes to and through Old Pasadena to the gold line stops, central park, and on south to Art Center's Design School with a road diet and bike lanes? It would certainly seem to make the area more attractive to developers if the street was activated with more foot traffic and people on bikes.

Otherwise, I think the plan looks very promising and I look forward to seeing much of it come to fruition over the next few years.

3. Response to Comments

Thank you for your time!

Richard Hogge
Tremolo Creative
(805) 630-1786
tremolocreative.com
[@teetotalerr](https://www.instagram.com/teetotalerr)
[facebook.com/richard.hogge.1](https://www.facebook.com/richard.hogge.1)

3. Response to Comments

R5. Response to Comments from Richard Hogge, dated February 10, 2015.

R5-1 The commenter expresses support for components of the General Plan Update. No response is necessary.

R5-2 The commenter supports pedestrian traffic signal syncing at Arroyo Parkway to access the Metro Gold Line stops. The pedestrian pushbuttons are used to change traffic signal timing to accommodate pedestrian street crossings with enough time for pedestrians to cross the street. Pushbuttons are needed at some crossings as traffic signals become more complex. In higher pedestrian zones, pedestrian walk signals are programmed to “pedestrian recall” which means that the pedestrian phase automatically turns on without having to push the button. These signals operate in pedestrian recall mode during high pedestrian peak times. In areas where there is minimal to no pedestrian activity the standard wait time for pedestrian crossing is not needed. Recent traffic signal improvements at at-grade Gold Line crossings led to the adjustment of pedestrian signals which allow pedestrians to cross when the gates are down. Prior to the adjustments the intersections needed to be clear for safety precautions. This comment relates to pedestrian improvements, not the sufficiency of the DEIR. However, the comment is noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.

R5-3 Marengo Boulevard currently offers a sharrow, a shared-lane marking for bicyclists, connecting Villa to Cordova. Consideration to add a bicycle lane to connect the gap will be taken into consideration.

Raymond Avenue does not cross the freeway to connect the northern bike lanes to Old Pasadena and Civic Center, because most bicyclist use the bike sharrow on Marengo to connect into Old Pasadena or the Civic Center. South of Del Mar, Raymond Avenue was widened to accommodate four standard width travel lanes as part of State Route 710 Mitigation Project. The project was constructed using federal funding to improve mobility in areas identified as impacted by the gap in the 710 freeway. The receipt of these funds precludes the City from adding any bicycle facilities on Raymond Avenue.

These comments are noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.

3. Response to Comments

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3. Response to Comments

LETTER R6 – Richard Luczynski (Letter 1 of 2) (4 pages)

Chima, Vicrim

From: richard luczynski <rluczynski@hotmail.com>
Sent: Wednesday, February 11, 2015 9:55 PM
To: Chima, Vicrim
Cc: McAustin, Margaret; Terry Tornek
Subject: RE: Draft General Plan Update & Draft EIR Public Meeting

Vicrim, It wasn't a very enlightening meeting tonight. I think you were preaching to the choir. Everyone there could have read your presentation. I'm really surprised that more questions weren't asked about the body of every study. I came prepared to ask questions on every sentence of the mobility and land use documents. But I did want to get my main point across that your document is not mentioning one thing about public health of Pasadena residents or visitors for multiple reasons concerns Air Quality, actual measurements at the Freeway as well as parallel streets north and south that could have similar readings. But we won't know until we put language in the Land Use Document making it so. I'm also surprised that I was the only one there speaking on this issue. What does this say about important issues in Pasadena with the public. I still would like a definition of what your Documents mean, concerning Quality Of Life and Air Quality?
Richard Luczynski

R6-1

From: rluczynski@hotmail.com
To: vchrima@cityofpasadena.net
Subject: RE: Draft General Plan Update & Draft EIR Public Meeting
Date: Thu, 5 Feb 2015 06:06:56 +0000

Vicrim, I was just looking at the Air Quality information of the DEIR. I would ask that you go over this information again and spend much more time at the upcoming comment hearing to explain what is said in this document. Everything in it says we will not meet the Air Quality that we seek, with every conclusion page. But still I didn't see any mention of having Air Quality Monitors installed near the Freeway, just to let us all know what we are breathing. Still a lot of this information talks about the construction phase air quality but need to be specific about the Freeway Air Quality. I will go over each paragraph and try to point out what I consider to be important for the health of our citizens of Pasadena and those who come to visit us daily. I would also like to see project studies done that talks about what contractors have summited about air quality as a cumulative impact. Somewhere in all these pages I read something about their responsibilities. I'll find the wording as I go through the document.

R6-2

The meeting on the 11th I believe is still on even though I got something today from J Garzon talking about meetings on the 19th. and 21st. Michael Beck said the dual meeting between the Mayor's race and Planning is out of his control. I'll be back in touch as I read the DEIR ,Air Quality portion and try to brake it down to make more sense before the completed Plan is put in place.
Richard

R6-3

From: vchrima@cityofpasadena.net
To: rluczynski@hotmail.com
Subject: RE: Draft General Plan Update & Draft EIR Public Meeting
Date: Mon, 2 Feb 2015 18:35:56 +0000

3. Response to Comments

Mr. Luczynski,

I think that is a reasonable approach. We'll be recording verbal comments, and accepting written comments, and responding to both. If you'd like to prepare a written statement after the meeting, that is acceptable. Just submit it to me before the conclusion of the public comment period on March 24, 2015.

Vicrim Chima
626-744-6791

From: richard luczynski [mailto:rluczynski@hotmail.com]
Sent: Monday, February 02, 2015 10:14 AM
To: Chima, Vicrim
Subject: RE: Draft General Plan Update & Draft EIR Public Meeting

Vicrim, So the best bet is to come to the meetings and follow up with a written Acknowledgement? Can e-mails to You be classified as written responses?
Richard Luczynski

From: vchrima@cityofpasadena.net
To: rluczynski@hotmail.com
CC: mlmorales@cityofpasadena.net
Subject: RE: Draft General Plan Update & Draft EIR Public Meeting
Date: Mon, 2 Feb 2015 17:12:56 +0000
Good Morning Mr. Luczynski,

The public will be able to comment on the content of the Draft EIR (DEIR), Land Use Element (LUE), and Mobility Element (ME). Statements that are related to environmental issues will be recorded and be responded to in the Final EIR. Comments on the policies in the LUE and ME will also be recorded and responded to, but separately from environmental comments.

Thank you for your interest,
Vicrim Chima, Planner
Design & Historic Preservation
General Plan Manager
626-744-6791

From: Morales, Margo
Sent: Friday, January 30, 2015 11:31 AM
To: Chima, Vicrim
Cc: 'richard luczynski'
Subject: FW: Draft General Plan Update & Draft EIR Public Meeting

Hello,
Please respond to Mr. Luczynski's question below.

Margo Morales
District 2 Field Representative
(626) 744-4742

3. Response to Comments

(626) 744-3814 fax
To Join Our Mailing list go to www.cityofpasadena.net/district2

From: richard luczyski [mailto:rluczyski@hotmail.com]
Sent: Thursday, January 29, 2015 8:46 PM
To: Morales, Margo
Subject: RE: Draft General Plan Update & Draft EIR Public Meeting

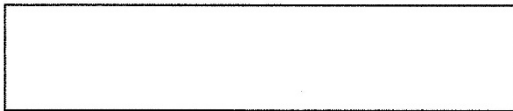
Margo, I did and I'm looking it over. Will this meeting talk only about the mobility element and the Land use or the entire EIRRichard

From: mimorales@cityofpasadena.net
To: rluczyski@hotmail.com
Subject: FW: Draft General Plan Update & Draft EIR Public Meeting
Date: Thu, 29 Jan 2015 22:03:53 +0000
Hi Richard,

Did you get this?

Margo Morales
District 2 Field Representative
(626) 744-4742
(626) 744-3814 fax
To Join Our Mailing list go to www.cityofpasadena.net/district2

From: City of Pasadena - Planning & Community Development
Sent: Wednesday, January 28, 2015 5:38 PM
To: Morales, Margo
Subject: Draft General Plan Update & Draft EIR Public Meeting



**CITY OF PASADENA
NOTICE OF PLANNING COMMISSION PUBLIC MEETING TO PROVIDE COMMENTS**

SUBJECT: Review of a Draft Environmental Impact Report related to the Draft Land Use Element and Draft Mobility Element for the Pasadena General Plan Update.

NOTICE IS HEREBY GIVEN that the Planning Commission will hold a public meeting to receive input from the public and provide comments on the Draft EIR. This is an informational meeting only. No formal decision will be made at this time, and an official public hearing where formal action is taken will be held at a future date to be determined.

Date: Wednesday, February 11, 2015

Time: 6:30 p.m.

Place: Council Chambers, Room S249 (100 N. Garfield Avenue, Pasadena, CA 91101)

3. Response to Comments

PROJECT DESCRIPTION: The proposed project is the adoption and implementation of an update to the City of Pasadena General Plan and specific plan amendments to update the development caps and boundaries within each specific plan area. The proposed project focuses on the Land Use and Mobility Elements and Land Use Diagram. The update also includes the consolidation of optional elements into required elements of the General Plan. The Land use and Mobility Elements, together with the other General Plan elements, would guide the overall physical development and circulation of the entire City through horizon year 2035.

ENVIRONMENTAL DETERMINATION: The City of Pasadena has completed a Draft Environmental Impact Report (Draft EIR) for the Pasadena General Plan Update. The Draft EIR analyzed the environmental impacts to 14 study areas, and determined that the proposed project would result in significant environmental impacts in the areas of Air Quality, Greenhouse Gas Emissions, Noise, and Transportation/Traffic even with the implementation of mitigation measures. However, impacts related to the other 10 study areas were determined to be less than significant either with or without incorporation of mitigation measures.

COMMENTS: Comments on the Draft EIR, Land Use and Mobility Elements may be received in writing between **January 22, 2015 and March 24, 2015**. Please send your written comments to: Vicrim Chima, Planner, General Plan Manager, Phone: (626) 744-6791, E-mail: vchima@cityofpasadena.net, Mailing Address: Planning & Community Development Department, 175 N. Garfield Avenue, Pasadena, CA, 91101. If you are commenting on behalf of an agency or organization, please indicate a contact person for your agency or organization. If you wish to challenge the EIR in court, you may be limited to raising those issues that you or someone else raised at any public hearing or meetings where these documents were considered.

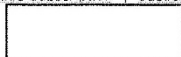
AVAILABILITY OF ENVIRONMENTAL DOCUMENTATION: The Draft EIR, Land Use and Mobility Elements are available for review during regular business hours at:

- Office of the City Clerk, 100 N. Garfield Avenue, Room S228, Pasadena, CA.
- City of Pasadena, Permit Center (Window 3), 175 N. Garfield Avenue, Pasadena, CA.
- All ten (10) branches of public library (locations and hours for each branch can be found on the City's website at: http://cityofpasadena.net/library/about_the_library/locations_and_hours/)

The Draft EIR, Land Use and Mobility Elements are also located on the City's website at: http://www.cityofpasadena.net/2015_Draft_Documents/.

ADA: *In compliance with the Americans with Disabilities Act (ADA) of 1990, listening assistive devices are available with a 24-hour advance notice. Please call (626) 744-4009 or (626) 744-4371 (TDD) to request use of a listening device. Language translation services may be requested with 48-hour advance notice by calling (626) 744-4009.*

You are currently subscribed to plandevmeetings as: mfuller@cityofpasadena.net
Add jgarzon@cityofpasadena.net to your email address book to ensure delivery.
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3. Response to Comments

R6. Response to Comments Richard Luczynski (1 of 2), dated February 11, 2015.

R6-1 Please refer to Section 2.3, *Air Quality*, of this FEIR. Air quality impacts are analyzed in Section 5.2, *Air Quality*, of the DEIR. The section discusses the connection between air quality and public health, including the rationale behind adopted ambient air quality standards, which emphasize protection of sensitive receptors—such as young children and the elderly—from negative health outcomes. Air pollutants of concern and related adverse health effects are defined in Subsection 5.2.1.2 of the DEIR.

In any community, multiyear air quality monitoring data is only available from a finite number of sources. CEQA documentation must utilize the most geographically- and chronologically-appropriate data available. For the proposed project, the data that best represents the ambient air quality within the City is data collected by the South Coast Air Quality Management District (SCQAMD) at its Pasadena – North Wilson Avenue and Burbank – West Palm Avenue monitoring stations. For a project the size of the General Plan Update, collecting localized data at or near all major roadways is not feasible. Furthermore, the DEIR discloses that during the planning period of the General Plan Update, major roadways and intersections throughout the City would generate significant air quality impacts, with or without the proposed project. These impacts are largely a function of regional transportation and land use patterns, which affect the entire basin's air quality. Although data from additional monitoring stations might reveal minor variations in localized air quality, it would not change conclusions about Pasadena's overall air quality disclosed in the DEIR.

As described in Section 5.2 of the DEIR and in the response to Comment R7-5 in this FEIR, mitigation has been identified in the EIR (Mitigation Measure 2-4) requiring that health risk assessments (HRAs) be prepared for projects that introduce sensitive receptors in specific air quality buffer zones (as defined by the California Air Resources Board). Preparation of HRAs and implementation of design measures found in those HRAs would substantially reduce localized air quality impacts associated with freeway adjacency.

R6-2 Please refer to Section 2.3, *Air Quality*, of this FEIR. Section 15370 of the state CEQA Guidelines defines mitigation as 1) avoiding the impact altogether; 2) minimizing any significant impacts by limiting the degree or magnitude of the action and its implementation; or 3) or rectifying those impacts by repairing, rehabilitating, or restoring the impacted environment. In other words, the purpose of mitigation measures is to tangibly reduce or avoid significant adverse impacts. Although additional air quality monitoring stations in the City—including new sites near freeways, as suggested—would increase the amount of localized air quality data available, this information alone would not mitigate air quality impacts.

3. Response to Comments

However, the City is committed to finding new ways to improve air quality in Pasadena. The proposed Land Use and Mobility Elements include policies and implementation measures that would promote air quality improvement. For example, see Land Use Policies 10.1, 10.2, and 27.5; Mobility Policy 1.9; and Mobility Implementation Measure 1.7.

- R6-3 This comment and subsequent including emails relate to public meetings that were responded to by email. No further response is necessary.

3. Response to Comments

LETTER R7 – Richard Luczynski (Letter 2 of 2) (2 pages)

Chima, Vicrim

From: richard luczynski <rluczynski@hotmail.com>
Sent: Tuesday, March 24, 2015 8:35 AM
To: Chima, Vicrim
Subject: Comments for the Draft EIR and other comments

Vicrim, I would hope that all my other comments in past meeting and e-mails would also be added to my response to the DEIR and the General Plan elements.

R7-1

I have worked with my neighborhood association with issues that are important to all of us. I'll let that be a further comment on the new General Plan.

I do want to re-iterate my issue on Air Quality which in the DEIR is listed as "significant and unavoidable" This theme run through 5.2, 5.2-2,5.2-3, 5.-4. Why is it so unavoidable? !.5 lists mitigation measures but doesn't refer to any road side /freeway air monitoring on a daily basic. Real values of the Air Quality is never mentioned. As a progressive city that Pasadena talks about, where have we reached out to help solve our air quality problem? We have had no education on this problem and we just wish it would go away so that we wouldn't have those words of" Significant and Unavoidable" in all our planning documents. Where is the research the city has done on this problem? The City passes the buck and relies only on regional values that may not be or shouldn't be Pasadena values. Burbank has a air monitor and then we move down the 134 freeway to the 210 freeway all the way to Azusa before another air monitor is present. A very wide gap in the Air Monitoring system. I wonder whether Pasadena has ever asked the SCAQMD for some roadside monitoring equipment? If not then why not? We are the jewel of the valley but care little for our citizens health. It's time to add a Health Element to the New General Plan that has taken forever to developed. We do have a ambient air station at Cal-Tech, but that station is 1.3 miles south of the 210 freeway and I have read that the data isn't current or complete. This is another reason we need to look for better actual readings closer to the heavy traffic areas.

R7-2

The cost of the Air Monitoring equipment is very reasonable when considering health issues. The City of Pasadena spends million of dollars for its employees health issues and I'll bet some have respiratory problems that may be due to their jobs in the city. Why is it an omission to talk about good health when Planning for a better city for all?

R7-3

Pasadena health department has created a CHIP program. Exercise is one issue in the program. Exercise for all of us creates a need to breathe more deeper air into our lungs. The General Plan Mobility element wants us to walk and ride bikes more to curtail driving. This is a fairy tail dream that will only happen when all other sources of energy have been depleted.

How do we start to mitigate something that is "Significant and Unavoidable" We start by letting people know what they are really breathing daily that gives them and their families the knowledge of health risks that they don't understand currently. When more people understand those risks they are more likely to work together and solve the problem faster. I never see any mention of AIR Quality issues in Pasadena City literature , Such as "In focus" maybe a reminder once in awhile from other departments as well, to understand what we all breathe when 325,000 cars and trucks a day pass by on the 210 Freeway.

R7-4

3. Response to Comments

I still want to put Pasadena on Notice that when property sell or rent and the City Planners give permits to build along the freeway corridor a disclosure document of possible Health Risk associated with living next to a Freeway needs to be provided with each transaction. | R7-5

Lastly, the presentations given by the Planning Department and friends was of no real value when the presentation didn't include any/all the comments from the community meetings. The people's wants and needs I believe have been set aside in the final drafting of the upcoming General Plan Update. It was hard for me to believe that after asking at meetings, you did not include any of our thoughts, suggestions, concerns. Clearly, a snub to the people who came out to give their time and inpute. | R7-6

I look forward to the final draft and hope for some changes to be made.

Thank You for my chance to comment:

Richard Luczynski

3. Response to Comments

R7. Response to Comments from Richard Luczynski, dated March 24, 2015.

- R7-1 The commenter's previous comments from February 5, 2015 and February 11, 2015, as well as the community forums are included in this FEIR (see response to Comments R6-1 through R6-3, F1-6, F1-7, F-9, F2-8, and F2-12).
- R7-2 Per Section 15126.2(b) of the CEQA Guidelines, "significant and unavoidable" impacts are those that cannot be avoided or reduced to a level that is less than significant, even after incorporation of feasible mitigation measures. As discussed in Section 2.3 of this FEIR and response to Comment R6-2, the installation of additional air quality monitoring stations in Pasadena could aid in the future analysis of local air quality. However, this information, alone, would not mitigate air quality impacts of the City's buildout. In particular, most of the significant and unavoidable air quality impacts of the proposed project are those related to the overall air basin's nonattainment of ambient air quality standards and the related SCAQMD's methodology and significance thresholds for evaluating a project's impact. The existence of additional air quality data for specific locations in Pasadena would neither have a tangible effect on the air quality of the South Coast Air Basin nor change the methodology or analysis for evaluating the proposed General Plan Update's impact on the Basin's air quality. Therefore, the existence of additional air quality monitoring data would not reduce the aforementioned impacts to less than "significant and unavoidable."
- R7-3 This comment relates to an analysis of healthy communities and the proposed Mobility Element policies proposed by the General Plan Update, not the potential environmental impacts of the project. However, the comment is noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.
- R7-4 As stated in the response to Comment R7-2, increased community and governmental awareness of air quality issues in Pasadena, while potentially beneficial, would not in itself constitute mitigation of a potentially significant impact because it would not result in a tangible reduction of the proposed project's significant impacts.
- R7-5 Mitigation Measure 2-4 identified in the DEIR requires that that City evaluate development proposals for sensitive land uses (such as residences, schools, and day care centers) for potential incompatibilities with regard to the California Air Resources Board's Air Quality and Land Use Handbook: A Community Health Perspective (April 2005). Mitigation Measure 2-4 requires that, when appropriate, project applicants of such projects prepare health risk assessments and implement project-level mitigation measures that are capable of reducing potential cancer and noncancer risks to acceptable levels. Suggested actions include those that reduce health risks due to air pollutants generated by high volume roadways (such as freeways).

3. Response to Comments

- R7-6 The purpose of the public meetings held during the DEIR public review period was to provide an overview of the project, the CEQA process, and to document comments and input from the community on the DEIR. Public comments were received, documented, and responded to in this FEIR, in accordance with CEQA Guidelines Sections 15088, 15088.5, and 15089.

3. Response to Comments

LETTER R8 – Steve Madison (1 page)

From: Madison, Steve
Sent: Thursday, March 12, 2015 11:38 AM
To: Bertoni, Vince; Reyes, David
Cc: Beck, Michael; Mermell, Steve
Subject: Request to Restore FAR in the Fair Oaks CD6 Area

This is a request to maintain the FAR in the Palmetto/Waverly area west of Fair Oaks Avenue at 1.25 rather than the proposed .9. Please let me know what further actions are needed.

R8-1

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3. Response to Comments

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3. Response to Comments

R8. Response to Comments from Steve Madison, dated March 12, 2015.

R8-1 This comment relates to the development intensities allowed under the General Plan Update, not the potential environmental impacts of the project. However, the comment is noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.

3. Response to Comments

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3. Response to Comments

LETTER R9 –Bryant Mathews (1 page)

Chima, Vicrim

From: Bryant Mathews <bryantm@gmail.com>
Sent: Sunday, March 08, 2015 9:56 PM
To: Chima, Vicrim
Subject: development of North Lake

Dear Mr. Chima,

I am writing to communicate my support for the North Lake Corridor section of the General Plan. I am a homeowner and resident in the proposed area and very gladly welcome mixed-use development along the North Lake Corridor. Its proximity to the Lake Ave station and many bus lines makes it an ideal location for development involving increased density and commercial activity. | R9-1

I also hope that development is in line with Pasadena's legacy of beautiful and timeless design, with green space, trees, and pedestrian-friendly sidewalks. For example, the building on the southwest corner of Los Robles and Orange Grove is really an eyesore and would have never been developed in the central district, whereas the new Playhouse building on El Molino and Colorado is turning out to be gorgeous. | R9-2

Thank you for your time,

Bryant Mathews

1

3. Response to Comments

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3. Response to Comments

R9. Response to Comments from Bryant Mathews, dated March 8, 2015.

R9-1 The commenter supports mixed use development along the North Lake Corridor. No further response is necessary.

R9-2 This comment relates to the design of future buildings and projects, not the potential environmental impacts of the project. However, the comment is noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.

3. Response to Comments

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3. Response to Comments

LETTER R10 – North Mentor Avenue Residents Group (6 pages)

March 23, 2015

VIA Electronic Transmission: vchima@cityofpasadena.net

Mr. Vicrim Chima
Planner
General Plan Manager
Planning & Community Development Department
City of Pasadena
175 N. Garfield Avenue, Pasadena, CA 91101

Re: Comments on General Plan Update for City of Pasadena

Dear Mr. Chima:

In response to the January 20, 2015 Notice of Availability (“NOA”) for an Environmental Impact Report (“EIR”) for the Pasadena General Plan Update, representatives for many of the homeowners and residents of North Mentor Avenue between E. Orange Grove Boulevard and E. Claremont Street (“North Mentor Avenue Residents”) submit the following comments. All of North Mentor Avenue from E. Orange Grove Boulevard to E. Washington Boulevard is part of the City’s first Landmark District – the Bungalow Heaven Landmark District.

R10-1

We reiterate the concerns expressed in our comments on the Notice of Preparation made on October 19, 2013. Our concerns were not adequately addressed in the draft General Plan EIR. We respectfully disagree with the response in the EIR that mere adherence to the Land Use Element Policies 4.11, 4.12, 6.2, and 36.4 would ensure that new projects along North Lake Avenue would be designed to be context-sensitive. There is nothing in the EIR that requires any particular action to implement these goals, and they are merely subjective expressions.

R10-2

Our residents are concerned with the proposed Land Use Diagram designations on North Lake Avenue and E. Orange Grove Boulevard. North Mentor Avenue is the street directly to the east of North Lake Avenue. Since our western residents’ backyards abut the rear of the structures on North Lake Avenue, the land use designations on North Lake Avenue directly impact residents on North Mentor Avenue.

R10-3

3. Response to Comments

Letter to Mr. Chima
March 23, 2015
Page 2

Currently, North Lake Avenue between E. Orange Grove Boulevard and E. Washington Boulevard is designated in the General Plan as "Specific Plan." A designation of "Low Commercial" is shown on the proposed General Plan Land Use Map for North Lake Avenue between E. Orange Grove Boulevard and E. Mountain Street. We appreciate that this proposal was changed from staff's original recommendation of "Mixed Use" in order to protect our neighborhood from SB 1818 (codified in Government Code Section 65915) and other negative impacts outlined in the petitions submitted by the North Mentor Avenue residents in March/April of 2013.

R10-4

The General Plan EIR in no place studied the foreseeable impacts of designating that portion of North Lake Avenue as Mixed use in light of SB 1818, a California state law adopted in 2004 that took effect in 2005. That law is an ill-conceived attempt to create more affordable housing in California that eviscerates long-established land use laws and local land use control. We are concerned that the North Mentor Avenue single-family houses from E. Mountain Street to E. Washington Boulevard are still vulnerable to SB1818 because that stretch of North Lake Avenue is still designated Mixed Use. We also are concerned with the impact of SB 1818 on the northwest lot at the corner of E. Orange Grove and North Mentor Avenue. Therefore, to protect our neighborhood from the negative significant impacts caused by this law, we respectfully make the following three requests.

R10-5

1. Request Study of Reasonable Alternative: Low Commercial Designation for North Lake Avenue from E. Mountain Street to E. Washington Boulevard

We previously requested, and renew our request, that a "Low Commercial" designation be studied in the EIR for North Lake Avenue from E. Mountain Street to E. Washington Boulevard as a reasonable alternative to the current proposed "Mixed Use" designation. This EIR is arguably inadequate without this alternative. "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or lessen any of the significant effects of the project." California Environmental Quality Act Guidelines, Section 15126.6(a). In this case, such a "Low Commercial" designation would achieve the stated objectives of the proposed General Plan, such as directing higher density development away from lower density development and preserving historic neighborhoods by building new construction compatible with historic resources. It would also avoid the negative impacts of a "Mixed Use" designation which would make this area vulnerable to structures 3, 4 or 5 stories high because of SB1818 (as explained below).

R10-6

In particular, "Low Commercial" designation should be studied for this area because when this area was originally designated "Mixed Use" in the North Lake Specific Plan, SB 1818 was not enacted yet. SB1818 grossly changed the impact of a

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"Mixed Use" designation because it allows developers "concessions" to violate height or other development standards. These concessions are only required to be offered "to multi-family residential and mixed-use development projects consisting of five or more dwelling units not including units granted as a density bonus." (Pasadena Municipal Code Section 17.43.020.) Thus, these concessions are not available in commercial zones. Now, with SB1818 in effect, the "Mixed Use" designation provides developers with the opportunity to obtain "concessions" to increase height over current limits (or obtain other variances from development standards) as long as developers can show the concessions are required to make an affordable housing project feasible. This was never what was intended by the original "Mixed Use" designation in the North Lake Specific Plan. Designating North Lake Avenue between E. Mountain Street and E. Washington Boulevard as "Low Commercial" will remove the possibility of too-tall structures adjacent to North Mentor Avenue and all of the negative significant impacts that such tall structures would bring to a single family residential historic neighborhood.

R10-6
cont'd

2. Request that the Foreseeable Significant Negative Impacts of Designating North Lake Avenue from E. Mountain Street to E. Washington Boulevard As "Mixed Use" Be Studied in the EIR, Including the Negative Impacts Caused by Permitting 3, 4 or 5 Story Mixed Use Structures Under SB 1818

SB 1818 is a one-size-fits-all approach. It overlays density everywhere — across entire cities — without regard for:

- The character of neighborhoods, including whether the scale and aesthetic of proposed projects are compatible with existing neighborhoods.
- The sufficiency of infrastructure, particularly transportation infrastructure, to adequately support it.
- Historical resources, as the statute is only concerned about the very few historical resources that are registered in the California Register of Historical Resources, and then only if there is a "severe" impact – which is not defined. (Government Code Section 65915(d).)

R10-7

This law invites developers to decimate current zoning protections under the guise of providing affordable housing. Specifically, variances that would not otherwise be permitted by a city's zoning, specific plan, historical overlay or adopted height-limit ordinances can be disregarded. These impacts must be studied and considered in the EIR.

Traditionally, courts and state law have very rarely allowed variances from development standards, only permitting them when the property owner can establish that special circumstances or unique characteristics justify a variance because a

R10-8

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property is deprived of the privileges enjoyed by other properties in the same zoning classification. (See Government Code Section 65906.) A triangular lot that cannot meet the setback requirements of its neighboring square-shaped lots is the perfect example. In that case, a variance from setback requirements is justified because of the unique characteristics of the property.

However, SB 1818 turns the law on variances upside down. SB 1818 *requires* that the City grant a variance – renamed a “concession” - unless the City can establish by substantial evidence that the concession is not required in order to provide for affordable housing costs or that the project would have a specific adverse impact related to public safety, the physical environment or a property registered on the California Register of Historical Resources. (Government Code section 65915 (d).) It is very hard for the City to establish these findings. The foreseeable reality is that if Mixed Use designation is granted, the City will not be able to resist granting these concessions.

R10-8
cont'd

The most likely concession a developer would seek under SB1818 is a variance from height limits because that is what allows more units and makes a project more profitable. Therefore, an increase in height and all of the negative impacts that follow must be studied in the EIR since the City has proposed to designate these areas “Mixed Use” rather than “Specific Plan.” A three-story or higher structure along North Lake Avenue adjacent to the homes will have significant negative impacts. In particular, the lots along the western side of North Mentor Avenue are shallow, so any Mixed Use structures over two-stories would result in a substantial loss of light and privacy. And for both sides of the street, it would create an urbanized landscape which would compromise the historical integrity of North Mentor Avenue and disrupt the single-family flavor of the street. Given that most of the homes in this area are low in height – in many cases only one story - - this area of North Lake Avenue requires very sensitive development and design standards. But SB 1818 would take many of these tools away from City planners where they are most needed because the developer could get to choose up to three “concessions.”

R10-9

Once North Lake Avenue is designated as “Mixed Use,” the City of Pasadena effectively allows too-tall structures on North Lake Avenue. This is because the City will not likely want to litigate whether 3, 4 or 5-story structures on North Lake Avenue will “have a specific adverse impact” on the Bungalow Heaven Landmark District, which is registered on the California Register of Historical Resources. Financially strapped cities cannot easily afford to engage developers in expensive fights over such issues. Thus, the impacts of a 3, 4 or 5-story building on North Lake Avenue on Aesthetics, Air Quality, Cultural (Historical) Resources, Noise, Traffic and Parking must be studied now – in this EIR - because these impacts are reasonably foreseeable results of the decision to designate this area Mixed Use. This decision on the designation in the EIR is the decision that matters. This is the City’s earliest, and only, opportunity to meaningfully

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study and consider the impacts of such a decision as required by the California Environmental Quality Act.

R10-9
cont'd

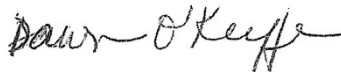
3. Request That The Lot on the Northwest Corner of E. Orange Grove Boulevard and North Mentor Avenue (currently an auto body shop) be Studied for Low Commercial or Low Density Residential Designation as a Reasonable Alternative to the Proposed Designation Medium Density Residential

A number of years ago, the auto-body shop at the northwest corner of E. Orange Grove Boulevard and North Mentor Avenue was zoned as RM-16. Now, the proposed Land Use Map designates this lot in the General Plan as Medium Density Residential. This lot is sensitively located at the southwest entrance to the Bungalow Heaven Landmark District. This Medium Density Residential designation leaves this area vulnerable to the use of SB 1818, which could result in the development of a structure incompatible with the scale and character of the neighborhood. Therefore, we urge the City to study other alternatives such as "Low Commercial" or "Low Density Residential" designations for this lot.

R10-10

Thank you very much for your consideration of the above.

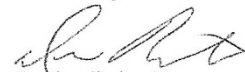
Respectfully submitted,



Dawn O'Keeffe



Samuel Ayvazian



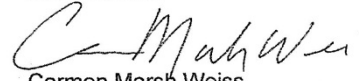
Denise Roberts



Elizabeth Fagan



Ross Rosario



Carmen Marsh Weiss



Julio Moravi

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cc: Victor Gordo, City Council Member
Margaret McAustin, City Council Member
Vincent P. Bertoni, Director of Planning Department

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R10. Response to Comments from North Mentor Avenue Residents Group, dated March 23, 2015.

R10-1 The City acknowledges the commenter's location within the Bungalow Heaven Landmark District. No further response is necessary.

R10-2 The DEIR is tasked with analyzing the environmental impacts of the General Plan Update, which is a programmatic document and does not analyze specific development proposals along North Lake Avenue or elsewhere in Pasadena. Accordingly, the commenter is correct that there are no particular actions to implement the General Plan goals in the EIR, because that is not the legal purpose of the EIR. Future projects would be required to show consistency with the General Plan Update. While the EIR for the General Plan Update can be used for future tiering (see Section 2.7 of the DEIR), it is not meant to provide full clearance for future site specific development projects within the City. Following adoption of the General Plan Update, the City will be updating the specific plans and zoning code to be consistent with the General Plan Update, which will also require future CEQA review. Furthermore, as discussed in Section 5.1-1 of the DEIR, the City implements a robust set of procedures, regulations, and guidelines related to development review of new projects in Pasadena, most of which require consistency with the General Plan. For example, the City evaluates the design of proposed projects for their consistency with its Citywide Design Principles and Design Guidelines, Design Guidelines for Neighborhood Commercial and Multifamily Districts, and the North Lake Specific Plan. These guidelines, as well as the City Municipal Code, address context-sensitive design and land use compatibility. For more information about the programmatic nature of the General Plan Update EIR, see Section 2.2 of this FEIR.

R10-3 This comment relates to the proposed Land Use Diagram and privacy issues, not the potential environmental impacts of the project. However, the comment is noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.

R10-4 The commenter expresses appreciation for changes to the Land Use Diagram made during the General Plan Update process. No response is necessary.

R10-5 For a comprehensive response to concerns regarding SB 1818, see Section 2.2 of this FEIR.

R10-6 It is important to note that the analysis of alternatives in the DEIR does not necessarily preclude other land use changes that may be considered or enacted by the decision-making body (City Council) during its consideration of project approval.

Section 15126.6(a) of the CEQA Guidelines, as quoted by the commenter, indicates that the purpose of analyzing project alternatives is to identify alternatives that would "...avoid or substantially lessen any of the significant effects of the project." The DEIR

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found that aesthetic impacts of the proposed project would be less than significant. In particular, the amount and scale of development allowed on North Lake Avenue under the General Plan update is not anticipated to “substantially damage scenic resources” or “substantially degrade the existing visual character or quality of the site and its surroundings” as stated by thresholds AE-1 and AE-3. Additionally, the DEIR determined that impacts to historic resources and districts would be less than significant with incorporation of Mitigation Measure 9-4, since the General Plan Update would not allow for development that would result in the material impairment of any historic resource. Therefore, the range of project alternatives was developed based on their potential ability to reduce documented potentially significant impacts. For the proposed project, these included impacts related to air quality, greenhouse gas emissions, noise, and traffic (see Chapter 6 of the DEIR for a list of the project’s significant unavoidable adverse impacts). For a comprehensive response to concerns regarding SB 1818, see Section 2.2 of this FEIR.

- R10-7 Since SB 1818 was enacted ten years ago, only eight projects (one of which was superseded by a later application) in Pasadena have received density bonus waivers and concessions under the law. For these projects, the majority of concessions were for minor changes to floor area ratios and setbacks. Continued implementation of SB 1818 is not anticipated to substantially alter the community character of the North Lake Avenue corridor or other area of Pasadena. Furthermore, SB 1818 does not exempt future projects from CEQA or from the City’s development review process. For a comprehensive response to concerns regarding SB 1818, see Section 2.2 of this FEIR.
- R10-8 Please refer to Section 2.2 of this FEIR. One point of clarification is that the City shall approve a concession, incentive, or waiver of development standards after it makes a finding that the concession, incentive or waiver is required in order for the designated units to be affordable (Pasadena Municipal Codes 17.43.050[D] and 17.43.060[D]). The onus is on the project applicant to provide evidence to support the applicable findings. If the findings cannot be supported then the Hearing Officer may deny the concession or waiver, as allowed by Government Code Section 65915.
- R10-9 Please refer to Section 2.2, *State Density Bonus Law*. It is not reasonably foreseeable that implementation of the General Plan Update would result in a significant increase in building height or would increase the number of stories allowed along North Lake Avenue due to implementation of the General Plan Update. First, the General Plan Update would not change the maximum building height allowed within the North Lake Specific Plan. In accordance with the North Lake Specific Plan, the maximum allowable height for buildings east of North Lake Avenue adjacent to Bungalow Heaven is 30 feet. Second, if a project applicant sought to build affordable housing in that location, there is no guarantee that they would receive a waiver of development standards to add an additional height. Pursuant to Pasadena Municipal Code Section 17.43.060, the project applicant must show that a waiver of development standards is required to construct the

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affordable housing. In practice, the City of Pasadena has not granted a waiver to maximum building height that would allow for the construction of an additional story since SB 1818 was enacted. Over the past 10 years there have only been eight approved development projects (one of which was superseded by a later application) that have received SB 1818 concessions, three of which included a concession for building height. The concessions for building height in one instance allowed a seven foot increase with height averaging, in another instance a four foot increase in the rear of the building, and the final permitted an increase of four feet six inches.

Finally, the North Lake Specific Plan allows work/live and mixed-uses adjacent to Bungalow Heaven under the current zoning. A project applicant could therefore seek concessions under SB 1818 under current conditions. Therefore, it is not expected that the General Plan Update allowing mixed use would trigger the influx of new affordable housing development with applicants seeking a waiver of development standards to increase building height.

Section 2.2, *State Density Bonus Law* in this FEIR addresses impacts related to aesthetics and cultural resources. Impacts related to light, air quality, noise, and traffic are analyzed in the DEIR in Sections 5.1, 5.2, 5.9, and 5.13, respectively. General Plan Update buildout would not result in increased day or nighttime light that would substantially affect views. The commenter alleges that the DEIR did not address air quality, noise and traffic impacts of the General Plan Update, however both construction and operational impacts of General Plan Update buildout were analyzed and mitigation measures were included. There are no new impacts anticipated. CEQA does not require the analysis of impacts related to privacy or parking, therefore these impacts were not addressed in the DEIR.

- R10-10 The parcel mentioned by the commenter is approximately 50 feet wide by 150 feet deep. Based on these dimensions, the site's allowed density under the General Plan Update, its narrow orientation, and parking requirements, the site could be realistically estimated to accommodate approximately three dwelling units if redeveloped. This scale of development would not be expected to "substantially damage scenic resources" or "substantially degrade the existing visual character or quality of the site and its surroundings." However, this comment will be forwarded to the decision-making body for consideration.

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LETTER F1 – Forum #1 (2 pages)

City of Pasadena General Plan Update and DEIR Community Forum #1, February 19, 2015

The City held two public forums on February 19, 2015 and February 21, 2015 as part of a larger public outreach program. It should be noted that the public outreach program included numerous opportunities for public input, including two pre-scoping and four scoping meetings. The purpose of the public forums in February 2015 was to gather additional feedback on the General Plan Update and accept DEIR comments as part of the CEQA process. At these public forums, staff presented the main components of the Draft Land Use Element, Mobility Element, and EIR. Staff described the project scope analyzed in the EIR, contents of the EIR, the CEQA process, and next steps required to certify the Final EIR.

Following the presentation, participants were encouraged to attend any of the three following stations: Land Use Element, Mobility Element, and/or Environmental Impact Report (EIR). In order to ensure that comments received on the DEIR were adequately addressed in this FEIR, the public was instructed to submit all environmentally related comments to the EIR station. Therefore, more detailed responses in this FEIR are provided below for comments that were received at the EIR station. However, all comments will be presented to City Council for consideration.

The following is a summary of key points discussed at the February 19, 2015 public forum. Several of the comments noted were supported by comment cards and notes included as Appendix C3, *Community Forum Comments*, to this FEIR.

- Land Use Element – one of main concerns raised with regard to land use was SB1818 and how it may lead to an increase in the number of residential dwelling units developed and the variances or concessions it allows (i.e., additional height). Participants were concerned that projects developed under SB1818 could potentially encroach on the privacy of adjacent residences. Participants expressed that they would like for the City to explore alternatives to the proposed low mixed-use development along specific areas in the City, in particular areas near historic single-family residential neighborhoods along Lake Avenue. Participants also expressed that they would like to see green space along Lake Avenue and some clean-up efforts take place in order to make it more pleasant for pedestrians. Other concerns raised or general topics discussed included reducing the overall growth potential, particularly in east Pasadena, and clarification of the implementation process once the General Plan Update gets adopted. F1-1
- Mobility Element – general comments included focusing density on secondary streets or adjacent nodes, encouraging live-work development in specific areas, the infrequent bus service, opposition to road diets/reduction on the number of travel lanes for vehicles, and the existing “un-walkability” condition along Lake Avenue and Washington Boulevard. F1-2
- Environmental Impact Report (EIR) – the main concern related to emissions from the I-210 Freeway and the resulting health effects on the existing and new residents in Pasadena. This and other specific comments included the following:
 - The CEQA process is difficult to follow because there are a lot of materials to review. F1-3
 - There needs to be an air quality station adjacent to the I-210 Freeway in the City of Pasadena so that the City and residents know the existing localized air pollutant concentrations. F1-4

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- The EIR needs to analyze the impact of adding residents near the Eaton Wash Dam and potential flooding issues. | F1-5
- The EIR should state how many cars per day travel on the I-210 Freeway. | F1-6
- The EIR needs to analyze air quality and how air pollution is dispersed from traffic on the freeway. | F1-7
- Noise issues need to be addressed in the EIR. | F1-8
- Health risk assessments should be included to study the impact of residential uses near the freeway and along the Gold Line. | F1-9

3. Response to Comments

F1. Response to Comments from Forum # 1, dated February 19, 2015

- F1-1 Please refer to Section 2.2, *State Density Bonus Law*. The comments relate to the proposed General Plan Update and Land Use Element, not the potential environmental impacts of the project. However, the comment is noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.
- F1-2 These comments relate to the proposed General Plan Update, Land Use Element, and Mobility Element, not the potential environmental impacts of the project. However, the comments are noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.
- F1-3 The EIR process for the General Plan Update has been conducted by the City and its consultants consistent with state law and the state's CEQA Guidelines. The DEIR was distributed for the maximum amount of time recommended under Section 15105 of the CEQA Guidelines (60 days). Furthermore, beginning on January 22, 2015, the General Plan Update and DEIR were available for review at the Office of the City Clerk, City of Pasadena Permit Center, Central Library, nine branch libraries, and the City's website. Above and beyond mandated requirements for public participation, the City held two public forums (February 19, 2015 and February 21, 2015) and collected input from ten City commissions (Arts and Culture, Design, Environment, Historic Preservation, Human Services, Northwest, Planning, Recreation and Parks, Senior, and Transportation) during the public review period of the DEIR. These formats for public participation were in addition to the traditional collection of written comments, which were received by the City of Pasadena via email and regular mail.
- F1-4 Table 5.2-3 in the DEIR identifies existing air pollutant concentrations in Pasadena during periods in which adopted pollutant thresholds were exceeded. Table 5.2-4 shows Pasadena's existing emissions inventory for criteria air pollutants, including ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, coarse particulate matter, and fine particulate matter. Also, please refer to Section 2.3, *Air Quality*.
- F1-5 No land use changes are proposed for the area near the Eaton Wash Reservoir and Dam. Under both the adopted General Plan and the General Plan Update, residential land uses are allowed near the reservoir. However, this area is largely built out and is not expected to experience substantial growth in dwelling units or population.

Additional development intensity (including that for residential land uses) is proposed downstream of the Eaton Wash Dam, primarily in the East Pasadena Specific Plan area. As shown in Figure 5.7-4 of the DEIR, this area is within the inundation area of the dam. However, as explained under Impact 5.7-3 (see page 5.7-23 of the DEIR), the probability that there would be significant water behind the dam coinciding with a dam breach is extremely low. Eaton Wash Reservoir typically contains water substantially

3. Response to Comments

below its capacity and the facility is specifically engineered to control water and debris generated by storm events. Continued implementation of existing monitoring programs and emergency/evacuation plans would reduce impacts related to failure of the Eaton Wash Dam to a less than significant level. Because this impact is not considered potentially significant, no mitigation is necessary.

- F1-6 The CMP congestion analysis in the EIR focuses on peak hour freeway traffic, not total vehicles per day. Table 5.13-9 in the DEIR identifies existing freeway traffic volumes for the three CMP freeway segments located in Pasadena. Table 5.13-10 projects future traffic volumes for the same three segments with implementation of the General Plan Update. As shown in these tables, freeway traffic volumes vary by segment and between AM and PM peak commute hours. Caltrans indicated that the I-210 freeway at Lake Avenue carried an Annual Average Daily Traffic count of 297,000 vehicles in 2013.
- F1-7 Section 5.2, *Air Quality*, of the DEIR, analyzes several different types of air quality impacts. Per CEQA, analysis in the EIR is primarily concerned with impacts of the proposed project on air quality. For this reason, the air pollutant emissions inventory in Section 5.2 (see Table 5.2-9) focuses on the impact of emissions generated by implementation of the General Plan Update, not the overall emissions generated in the City. However, through freeway traffic (including that not generated by land uses in Pasadena) is considered when analyzing the effect of placing sensitive receptors near area freeways. Under Impacts 5.2-4 and 5.2-5, the DEIR analyzes the impact of air pollutants on land uses allowed by the proposed land use plan, which include new residential uses near high-volume roadways.
- F1-8 The entirety of Section 5.9, *Noise*, of the DEIR analyzes the potential noise impacts of General Plan Update implementation. It should be noted that, due to the scale and programmatic nature of the proposed project, the DEIR contains program-level environmental analysis. Major development and infrastructure projects will be subject to project-specific CEQA compliance documents, which would include analysis of project-level noise impacts and associated mitigation.
- F1-9 Mitigation Measure 2-4 identified in Section 5.2, *Air Quality*, of the DEIR outlines requirements for the preparation of health risk assessments (HRAs) where sensitive receptors (including residential uses) would be placed near major sources of air pollutants. Mitigation Measure 2-4 lists examples of measures that could be identified in a project-level HRA, including measures that mitigate air quality impacts of high-volume roadways. Implementation of such measures would reduce health risks associated with living near major transportation facilities.

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LETTER F2 – Forum #2 (2 pages)

City of Pasadena General Plan Update and DEIR Community Forum #2, February 21, 2015

As noted under Forum #1, the City held two public forums on February 19, 2015 and February 21, 2015. The purpose of these public forums was to gather additional feedback on the General Plan Update and accept DEIR comments as part of the CEQA process. At these public forums, staff presented an overview of the General Plan Update and CEQA process and then participants were encouraged to attend any of the three following booths: Land Use Element, Mobility Element, and EIR tables. In order to ensure that comments received on the DEIR were adequately addressed in this FEIR, the public was instructed to submit all environmentally related comments to the EIR station. Therefore, more detailed responses in this FEIR are provided below for comments that were received at the EIR station. However, all comments will be presented to City Council for consideration.

The following is a summary of key points discussed at the February 21, 2015 public forum. Several of the comments noted were supported by comment cards included as Appendix C, Community Forum Comment Cards.

- Land Use Element – similar to the first public forum, the focus was on SB1818 and how it may lead to an increase in the number of residential dwelling units developed and the variances or concessions made (i.e., additional height) because of density bonus. Participants were concerned that the proposed plan did not take into account the additional dwelling units that could be built under SB1818. This group also noted that there are some potential issues with how density bonuses are implemented or granted. They also expressed concerns with how incentives are granted under density bonus. In general, participants wanted to know more about the application process, whether a policy could be included in the General Plan limiting SB1818, and eliminating several of the loopholes under SB1818. Additional comments noted included general support for density increases in the Central District in order to accommodate more housing units and reduce the cost of housing, encouraging granny flats and second dwelling units in all residential areas, preservation of industrial land uses in the South Fair Oaks Specific Plan, the lack of open space and parks, in particular in the Central District, reconsideration of setback requirements for fences within single-family residential neighborhoods, encouraging home-based businesses in all zones, unbundling of parking requirements to reduce cost of housing, and including form-based code in all specific plan areas based on historic and character of the area.
- Mobility Element – general discussion was that the Mobility Element should contain a strong Complete Streets program. One commenter noted that the Efficient Transportation Alternative is also superior to the Proposed Project. Other items discussed included recognition of peer-to-peer services (i.e., UBER) in the plan document in order to facilitate the expansion of such services and help minimize traffic congestion and address air quality, encouraging home-based businesses in all zones, ensuring that elements that are being collapsed still have commissions over them, including a discussion of implementing the I-710 corridor plan, and considering providing overlay maps to better understand why development is focused in certain areas.
- Environmental Impact Report (EIR) – the main concern related to emissions from the I-210 Freeway and the resulting health effects on the existing and new residents in Pasadena. This and other specific comments included the following:
 - There is a lack of noise enforcement in the City that the police need to address.

F2-1

F2-2

F2-3

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- The EIR should compare impacts to the adopted development cap. | F2-4
- Funding should be added to address create community connectivity by adding sustainable canopies over the I-210. | F2-5
- Explain what future actions trigger an EIR. For example, water supply has changed and should be addressed with future development. | F2-6
- The EIR fails to address impacts of eliminating thousands of non-conforming uses in Pasadena. The EIR needs to list all non-conforming uses and analyze the impacts of demolition, changing operations, and shift in employment. | F2-7
- There needs to be an air quality station adjacent to the I-210 Freeway. | F2-8
- Explain the difference between project and program EIRs. Explain what triggers a project EIR. | F2-9
- The main community issues are traffic, air quality, and noise. These need to be addressed in the EIR. | F2-10
- Explain the process of adopting EIR alternatives. | F2-11
- A health risk assessment is needed at Wilson and Corson. There are dust issues and lights out in the area. | F2-12
- Development caps should accommodate sufficient residential and nonresidential growth for the next 20 years. | F2-13
- The Central District, South Fair Oaks, Lincoln Avenue Alternative is the most conducive to allow comfortable absorption of additional people and cars. There is a tipping point where too many people reduce the quality of life. | F2-14

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F2. Response to Comments from Forum #2, dated February 21, 2015

- F2-1 Please refer to Section 2.2, *State Density Bonus Law*. General Plan policy comments relate to the proposed General Plan Update and Land Use Element, not the potential environmental impacts of the project. However, the comment is noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption. It is important to note that, since SB 1818 is a state law, the City could not adopt a General Plan goal or policy that would impede implementation of state law and the underlying public policy goals of that law.
- F2-2 These comments relate to the proposed General Plan Update, Land Use Element, and Mobility Element, not the potential environmental impacts of the project. However, the comments are noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.
- F2-3 The adopted Noise Element contains objectives, policies, and implementation programs related to unwanted noise, including noise generated by motor vehicles. Upon implementation of the General Plan Update, these objectives, policies, and programs would still apply. The proposed Land Use and Mobility elements are not the appropriate location for new or expanded police enforcement procedures related to noise. Furthermore, the DEIR determined that implementation of the General Plan Update would not result in long-term operational noise that would substantially elevate the existing noise environment (Impact 5.9-1) and would not expose noise-sensitive land uses to elevated noise levels from transportation sources (Impact 5.9-2). Therefore, no mitigation is needed.
- F2-4 It appears that the commenter suggests that the EIR should compare the proposed development caps with the existing development caps. Chapter 7 of the DEIR evaluates the “No Project/Adopted General Plan Alternative,” which is based on the policies, Land Use Diagram, and development caps of the Adopted General Plan. This alternative compares the General Plan Update with the Adopted General Plan. However, for purposes of analyzing environmental impacts and mitigation measures the DEIR must analyze impacts of the proposed project against the existing baseline conditions. Section 15125 of the CEQA Guidelines establishes the “baseline” conditions for CEQA analysis be the environmental conditions at the time the notice of preparation is published or at the time environmental analysis is commenced. For this reason, the body of the DEIR evaluates the effects of General Plan Update implementation as compared to existing conditions (2013).
- F2-5 The DEIR does not identify any potentially significant impacts related to canopies over the I-210 freeway or elsewhere. Therefore, no mitigation is needed.
- F2-6 Preparation of CEQA documentation for a development project is required when: 1) a development proposal has been submitted to a public agency, 2) that agency must make

3. Response to Comments

a discretionary action to approve the project, and 3) the project would result in a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment. An EIR is required when there is substantial evidence that a project may have a significant effect on the environment (CEQA Guidelines Section 15064). This determination is made by the lead agency.

Once a Program EIR has been certified for a project, subsequent projects within that program will be evaluated to determine whether additional CEQA documentation is required. A change in circumstances, such as the evaluation of water supply, will be considered at that time to determine whether there is the potential for new significant impacts requiring the preparation of an EIR.

With respect to water supply, Senate Bill 610 requires that water supply assessments (WSAs) be furnished to local governments for inclusion in any environmental documentation for certain projects subject to CEQA, as defined in Water Code Section 10912(a). Under SB 610, a WSA would be required for any project if it is a residential development of 500 units or more; a shopping center or business establishment project employing more than 1,000 persons or having more than 500,000 square feet of floor space; a commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space; or an industrial, manufacturing, or processing plant or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area. Individual development projects implemented under the proposed Land Use Diagram would be required to prepare a WSA if they meet these requirements.

Under Senate Bill 221, approval by a city or county of certain residential subdivisions requires an affirmative verification of sufficient water supply. SB 221 is intended as a fail-safe to ensure collaboration on finding the needed water supplies to serve a new large subdivision before construction begins. See Subsection 5.14.2 of the DEIR for additional information.

- F2-7 Implementation of the proposed project does not require nonconforming uses to be demolished or otherwise eliminated. Legal nonconforming uses and structures may remain. Land use designations identified on the proposed Land Use Diagram only restrict future entitlements on the affected parcels.
- F2-8 Please refer to Section 2.3, *Air Quality*.
- F2-9 Project EIRs are the most common type of EIR; they examine the impacts of a specific development or infrastructure project, such as a new building, housing tract, or highway improvement project. Project EIRs focus primarily on the changes in the environment that would result from implementation of that specific, well-defined project.

3. Response to Comments

A Program EIR is an EIR that covers a large project or policy document or a series of actions that work as one big project because they're related geographically, logically, by statute, or by similar impacts (CEQA Guidelines Section 15168). Comprehensive General Plan Updates are almost always processed using a Program EIR, since the details of individual development projects allowed under the proposed plan are not known and the impacts of proposed policies are general in nature. Analysis is generally programmatic and does not focus on localized environmental effects like in a Project EIR. Program EIRs are often used for "tiering," which is the practice of incorporating by reference the general environmental issues of a program EIR and concentrating on project-specific issues (either in a Project EIR or a more specific Program EIR). A "tiered" document is most often used for a project that implements the program covered by the broader EIR. See also response to Comment F2-6 for what constitutes a project under CEQA.

- F2-10 For a list of the proposed project's significant and unavoidable adverse impacts, see Chapter 6 of the DEIR. Implementation of the proposed project would result in significant unavoidable adverse impacts related to air quality, greenhouse gas emissions, noise, and traffic.
- F2-11 The lead agency's decision-making body, in this case the City of Pasadena City Council, may choose to adopt either the General Plan Update as proposed, something less than the project as proposed, or one of the project alternatives (if it finds that alternative feasible). The findings of fact prepared for the City Council's discretionary action must reflect 1) which scenario is being adopted, 2) applicable mitigation measures for that scenario, and 3) the status of potentially significant impacts after mitigation. The EIR's Statement of Overriding Considerations must also reflect the approved project/alternative. If a project alternative is approved, substantial evidence must be included in the administrative record documenting how the conclusions of the EIR remain valid.
- F2-12 The commenter refers to a site in the Central District of Pasadena that is currently vacant. The analysis and mitigation outlined in the EIR apply to new development potential under the general plan. Mitigation Measure 2-4 identified in Section 5.2, *Air Quality*, of the DEIR outlines requirements for the preparation of HRAs. Future entitlements on the site in question, and elsewhere in the City, would be subject to mitigation measures identified in Section 5.2 upon adoption of the General Plan Update.
- F2-13 The proposed project establishes new residential and nonresidential development caps for Pasadena's specific plan areas. See Chapter 3, *Project Description*, of the DEIR for more information.

3. Response to Comments

F2-14 The commenter endorses the adoption of a specific project alternative. No response is required.

3. Response to Comments

LETTER C1 – City Commissions (9 pages)

The following are verbal comments and questions received during the DEIR Comment Period from eleven Commission meetings held in February and March of 2015.

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3. Response to Comments

Arts & Culture Commission (3/11/15)

1. How are the Mobility Element and new street types related (if at all) to the Pasadena Passages project?

2. On the de-emphasized streets map, why was Villa Street chosen as a de-emphasized street over Green Street?

They later mentioned that they thought it was because Villa Street is largely residential.

3. Otherwise, no comments as a Commission. They may submit individual comments later.

C1-1

Design Commission (2/24/15)

1. Land Use Element Goal 7 – remove the word “some”:

GOAL 7. Architectural Design and Quality. An architecturally distinguished city with a diversity of building styles, including traditional and innovative and creative architecture. New development recognizes this by supporting a variety of building styles, materials, and construction techniques while demonstrating contextual relationship to its surroundings through traditional physical concepts (orientation, scale, materials) or non-physical concepts (cultural, climactic, economic).

2. Policy 4.9 “Gateways” – include “or engineering” to reference structures like the Colorado Street Bridge:

Gateways. Define prominent points of entry to the city with high quality, distinctive architecture or engineering (consider entry points like the intersection of South Orange Grove Boulevard and West Colorado Boulevard, or at North Fair Oaks at Woodbury, or structures such as the Colorado Street Bridge). Other elements, including art installations, landscaping, and light elements are also encouraged.

C1-2

3. Policy 6.1 “Sense of Place and History” – should include “courtyards, paseos, alleys”:

Sense of Place and History. Require new development and changes to existing development to be located and designed to respect the defining elements of Pasadena’s character and history such as its grid street pattern, block scale, public realm, courtyards, paseo, alleys, neighborhoods and districts, building massing and heights, significant architecture, and relationship to the mountains and Arroyo Seco.

4. Proposed Policy 6.8:

Proposed a new Policy which should address pedestrian passages, pathways, courtyards, alleys, public walkways, etc to support connectivity, infrastructure, and encourage business along those areas. (Related to TAC comment calling for the same policy).

3. Response to Comments

5. Water usage:

Some mention of water usage as it relates to new development; how will new development address water needs? | C1-3

Environmental Advisory Commission (3/17/15)

1. The EAC would recommend that the goals and objectives of the existing conservation and open space element be incorporated into the final draft of the General Plan Update, Land Use Element, and Mobility Element for as a reference and for internal consistency. | C1-4

Historic Preservation Commission (2/17/15)

1. Question about street classification map and street nomenclatures. Designations were unclear to him. | C1-5

2. Question about Wilson Ave (related to question below) – thought the designation on the map meant that there would be reduced vehicle flow along that street. | C1-6

3. No mitigations required for Land Use & Planning? May have future questions related to that. | C1-7

4. Topanga Formation” is a new term to him but it’s in his neighborhood. How will mitigations related to this be implemented in a single-family zoned area? Can’t do environmental review on single family homes – how will these be enforced? | C1-8

5. If a new development is within 25 feet of a historic structure, the applicant needs a vibration study – where did “25 feet” come from? Is it enough? Could it be changed to be reviewed case-by-case so the distance could be greater? | C1-9

6. Question about mitigation measures for structures that are eligible for historic designation but could be demolished. | C1-10

7. For damage caused by vibration, maybe it would be better to include a provision that damage to historic structures caused by vibration must be fixed by the applicant. Maybe require a bond on the project. | C1-11

8. Noted the number of historic resources (7,440) – we need to know how many potentially eligible resources are in areas of future development (the specific plan areas). | C1-12

9. Question about gold-lined street on streets map, thought it was Wilson Ave. Was not sure if the line/classification meant that cars would stop going along that street. | C1-12

3. Response to Comments

10. Note that the GP does in fact allow for the demolition of historic resources, eligible resources could be altered. Can we put some teeth into the GP policies or the ordinance to better preserve these structures?	C1-13
11. Should the vibration study mitigation be better defined? Possibly clarify it so that it's clearer that this is construction-related vibration (not helicopter or other sources of vibration).	C1-14
12. Have we consulted with an acoustician about the vibration study being an acceptable mitigation? Are there other procedures we can incorporate as part of mitigation measures?	
13. No mitigations required for hydrology/water quality? May have future questions.	C1-15
14. Can we get a 3D model representing the future buildout in 2035, based on GP?	C1-16
15. Wanted to see more development being pushed to East Pasadena.	C1-17
16. Would like to see more language in the archeo section, to make it more like the paleo section (a map, for example, to ID archaeological areas like there is for the paleo). The archeo section seems like an afterthought compared to the paleo section.	C1-18
17. Mitigation measure related to grading and human remains isn't really a mitigation measure because it's already state law. Maybe re-label that under "laws to comply with" or something like that.	C1-19
18. Add more detail describing your attempts to contact various Native American tribes so that it's clear that the City tried to contact them multiple times/ways and only heard back from one group.	C1-20
19. Is there any Federally owned land in Pasadena? (Several people noted the 9th Circuit Courthouse, Vista Del Arroyo, army base near a high school). This question was related to the Archaeological Protection Act of 1979 – she noted there were no Indian lands but possibly Federal lands in the City.	C1-21
20. Is this the MMRP? There have to be ways to measure and monitor implementation. How will people comment on the MMRP?	C1-22
Human Services Commission (3/11/15)	
<ul style="list-style-type: none"> Correct reference to Childcare Master Plan (1994). This reference is incorrect. 	C1-23
Northwest Commission (3/12/15)	
<ul style="list-style-type: none"> There's not much listed (in terms of goals/policies) related to open space. Did not see much about N. Lake or Fair Oaks 	C1-24

3. Response to Comments

- Staff explained that there were goals and policies specific to those areas and the commissioner noted that she still had to read more of the documents.
- On Lincoln, would permitted uses include more eateries and restaurants?
- Downtown LA is exciting but overstimulating; Pasadena has a calmer, better quality of life. What are the policies in place to ensure that Pasadena will not become overwhelming?
 - Staff highlighted to the Commission the list of relevant policies related to quality of life/balanced growth
- A lot of the Northwest is a food desert. Is that addressed in the Specific Plan?
- How are policies enforced?
 - Staff explained that's done through the implementation plan.
- Is there a timeframe to start working on updating the specific plans?
 - After we're done with the GP Update.

C1-24
cont'd

Planning Commission Meeting (2/11/15)

Transportation/Traffic

1. Where does the state stand on new transportation metrics? | C1-25
2. Pasadena Avenue/California Boulevard – no mitigation feasible | C1-26
3. How does the CD, SFO alternative relate to this impact? | C1-27
4. Mobility Element- agree with objectives and policies
5. EIR: will likely have comments; only 34 pages of EIR deal with traffic, because of new metrics (undervalue traffic); what would traffic impacts be if we used former City metrics? Please compare and contrast in FEIR. | C1-28

Specific Plans

6. Next step of Specific Plans – how will these be prioritized and when will we get started? | C1-29

Air Quality/Human Health

7. Shocked that not concerned with health risks | C1-30

3. Response to Comments

- | | | |
|-----|---|-------|
| 8. | Need to monitor air quality along freeway | |
| 9. | Bicyclists will be breathing heavier along freeway | |
| 10. | Putting parks over freeway is a bad idea | |
| 11. | Nothing in the document about protecting health | C1-30 |
| 12. | Need to have studies done on air (UCLA is doing a study) | |
| 13. | Where is the ambient air monitoring station? It is 1 1/3 mile away from freeway | |

Aesthetics/Cultural Resources

- | | | |
|-----|--|-------|
| 14. | Page 5.1-5: Examples of aesthetic resources table does not include some historic homes/housing stock; some historic houses that are not listed are some of the most valuable aesthetic resources | C1-31 |
|-----|--|-------|

Other

- | | | |
|-----|--|-------|
| 15. | Page 5.1-42: Caps in the Central District, this page shows higher number. Is this an example of the higher number studied? | C1-32 |
| 16. | Likes wildlife crossings | C1-33 |
| 17. | Will there be another PC meeting for commissioners to make comments? | C1-34 |

Planning Commission Meeting, March 11, 2015

Transportation/Traffic

- | | | |
|-----|---|-------|
| 18. | Previously commissioners expressed concern with new metrics. DOT staff said that both set of metrics would be run in EIR. That was not done – only new metrics. Concerned that EIR may understate traffic impacts. What would impacts be with old metrics? How do they compare to new metric impacts? If greater, what mitigation would be required? If greater, how would the impact factor into an SOC? | C1-35 |
| 19. | Understand that being directed by Council. Development going on now – Green Hotel, would be able to go by right and Dayton Street would be greatly impacts whereas under old thresholds there is a significant impact and mitigation needed. | C1-36 |
| 20. | Join in concern for traffic metric issue. Share concern if old metrics would have shown impacts – no way to check without the analysis. | C1-37 |

3. Response to Comments

21. California/Pasadena would have significant unmitigable traffic impacts. If you could physically fix traffic impacts at just one intersection, would that still conflict with policies to the point where the mitigation is not feasible? | C1-37
cont'd

22. Latitude from the State that local agencies can have stricter standards. California Avenue is significantly impacted in PM peak hour already. What local measures are we taking to mitigate? | C1-38

Air Quality

23. Air Quality: Concerned that General Plan build-out population and employment numbers would exceed projections |

24. Exceed SCAQMD threshold | C1-39

25. City experiencing onslaught of AQ impacts – 710, Devils Gate

26. Support CD, SFO, LA Alternative because it would reduce AQ impacts |

Noise/ Vibration/Cultural Resources

27. Mitigation for noise & vibration impacts: for construction, is there an ability to say that a project cannot go forward when other projects are occurring such that cumulative vibration impacts could affect buildings (including historic buildings)? | C1-40

Other

28. Process question: North Lake there was discussion of mixed-use or no mixed-use. Group of individuals talking about getting together to revised mixed-use on North Lake. If that came back as a land use change, what does that do to the DEIR? | C1-41

Recreation and Parks Commission (3/17/15)

The commission didn't make any formal comments, they opted to have two of their members draft comments along with their chair and then they'll send them to us. They did ask a few questions:

1. They wanted to know if and when the Green Space, Rec and Park Element and Master Plan would be updated. |

2. They wanted to be sure that the LUE clearly establishes the connections between the Guiding Principles and parks (such as connections between transportation and parks, arts and culture and parks, etc). | C1-42

3. Response to Comments

3. Related to the “Targeted Growth” policy in the LUE – the chair thought it sounded like we were encouraging growth NOT to be near parks/open space
4. Related to compatible land uses (Policy 3.2 in the LUE) – they asked what “compatibility” meant in this case and wanted some clarification. They wanted to avoid overconcentration of certain uses in some neighborhoods.

C1-42
cont'd

Senior Commission (3/10/15)

- No comments submitted

C1-43

Transportation Advisory Commission Comments

1. Comments from Commission as a whole:
 - Land Use Element:
 - a. Proposed a new Policy - Policy 6.8 – which should address pedestrian passages, pathways, courtyards, alleys, public walkways, etc to support connectivity, infrastructure, and encourage business along those areas. (Related to Design Commission comment calling for the same policy).
 - Mobility Element Policy 2.14:
 - b. Re: carsharing – support and/or facilitate public/private car sharing. May include the use of city or public resources and cooperation. Support the concept of carsharing by public/private entities.

Transportation Advisory Commission

C1-44

2. Comments from individuals during the meeting:
 - Just before Goal 18 of the LUE, there’s a typo in the paragraph –
By statute, the types and intensities of development permitted by the Land Use Plan must be correlated with the ability to provide adequate mobility to residents and visitors consistent with community values for acceptable levels of congestion. A primary principle defined by General Plan and Land Use Element is that Pasadena will be a city where people can circulate ~~with~~ without a car. Implementation of the mix and densities of uses depicted on the Land Use Diagram and urban form policies will promote walking, bicycling, and transit use

3. Response to Comments

<p>achieving this objective. The following goals and policies express the relationship between land use development and mobility.</p>	
<ul style="list-style-type: none"> • A commissioner noted that on Page 5.13-17, it was odd that religious facilities are expected to decline and medical offices would increase, as that would generate more traffic and parking. 	<p>C1-44 cont'd</p>
<ul style="list-style-type: none"> • A commissioner noted that for the Mobility Element, page 39, 2.5 says “increase bicycle parking”, but then there policy 2.9 which is almost the same thing. Suggested that this is duplicative and that you could remove the fragment from 2.5 since 2.9 covers it. 	
<ul style="list-style-type: none"> • A commissioner suggested identifying the EIR alternatives on more equal ground compared to the preferred project. Section 7.8 identifies the CDSFOLA alternative as the “Environmentally Superior Alternative”, however, the “Efficient Transportation Alternative” is also superior to the Project. Section 7.8 of the DEIR should identify <i>both</i> alternatives that are superior to the project, not just the CDSFOLA alternative. 	<p>C1-45</p>
<ul style="list-style-type: none"> • A commissioner suggested calling out the conclusion of the CDSFOLA alternative which states in Section 7.5.15 that the CDSFOLA alternative doesn’t achieve the goals of the project as well as the preferred project does – analyze how much and to what degree each alternative achieves the Project objectives. How much is each one achieving and at what environmental cost? 	<p>C1-46</p>
<ul style="list-style-type: none"> • A commissioner noted that the CDSFOLA alternative has a discussion related to population and housing (7.5.10: “Under the CD, SFO, and LA Alternative[...] The San Gabriel Valley jobs-housing ratio would be 1.32 without the General Plan Update versus 1.34 with the project.”00) which is not discussed in the other alternatives. All alternatives—not just the CDSFOLA alternative-- should examine the <u>regional</u>—not just the citywide—impacts on jobs, housing, and transportation. 	<p>C1-47</p>
<ul style="list-style-type: none"> • Commissioners discussed a letter from a member of the public which stated that pedestrian policies were scattered throughout the proposed LUE and called for the policies to be grouped together into a new “Walkability” policy section. Several commissioners commented that having pedestrian-related policies spread throughout the document lends greater weight to the importance of pedestrian activities and suggested leaving the policies in their current locations. 	<p>C1-48</p>
<p>9</p>	

3. Response to Comments

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3. Response to Comments

C1 Response to Comments City Commission

- C1-1 The General Plan Update and DEIR were presented to the Arts and Culture Commission on March 11, 2015. The commission's comments related to the proposed Mobility Element and de-emphasized streets map, not the potential environmental impacts of the project. However, the comment is noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.
- C1-2 The General Plan Update and DEIR were presented to the Design Commission on February 24, 2015. The commission had a number of suggested revisions to the proposed goals and policies in the proposed Land Use Element. These comments do not relate to the potential environmental impacts of the project. However, the comment is noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.
- C1-3 California Governor Edmund Brown Jr. declared a drought state of emergency on January 17, 2014, asking Californians to reduce water use by 20 percent. The US Department of Agriculture designated 27 California counties, including Los Angeles County, as primary natural disaster areas on January 15, 2014, due to the drought (USDA 2014). The California Department of Water Resources (DWR) reports that State Water Project allocations have been substantially reduced in recent years. There was a 35 percent allocation in 2013 and a 5 percent allocation in 2014, resulting from dry conditions. As of March 2015, the allocation was increased to 20 percent.

In response to the drought, the State Water Resources Control Board adopted Resolution No. 2014-0038 (July 15, 2014) and emergency regulations to ensure that water suppliers, their customers, and state residents increase water conservation and prohibits wasting water in urban settings. Water suppliers are required to activate their Water Shortage Contingency Plan, educate customers and employees, increase local supplies, and report progress.

State Mandates for Water Conservation

On April 1, 2015, Governor Brown signed an executive order directing the State Water Resources Control Board to impose a 25 percent reduction on local water agencies (compared to 2013 water usage). In addition to mandates for cuts in water usage, the executive order includes other conservations requirements and requires water purveyors and large agricultural producers to prepare detailed reports about water use to state regulators.

On April 28, 2015, the State Water Resources Control Board outlined its plan for new mandates on water usage. They consist of conservation targets based on per-capita residential water use. They sort the state's water districts into nine tiers, each with their

3. Response to Comments

own mandated reductions in water usage based on current consumption rates. The lowest is a 4 percent cut, but most agencies are required to cut usage between 8 and 36 percent. Pasadena Water and Power (PWP) was assigned a 28 percent reduction target.

Water Supply Analysis in the DEIR

The DEIR analyzed water supplies and projected water needs based in part on Pasadena's 2010 Urban Water Management Plan (UWMP). Water supply is analyzed in Subsection 5.14.2, Water Supply and Distribution Systems, of the DEIR. This subsection explains that Pasadena Water and Power (PWP) obtains water from four sources: groundwater from the Raymond Groundwater Basin; surface water from the Arroyo Seco and Eaton Canyon; purchases from neighboring agencies that combine surface water and groundwater; and imported water from northern California and the Colorado River purchased from the Metropolitan Water District of Southern California (MWD). The subsection also describes water supply projects planned by PWP that would increase the available water supply. Section 5.14, *Utilities and Service Systems*, of the DEIR acknowledges that Southern California and Pasadena face challenges related to the long-term availability and reliability of water supplies. The Metropolitan Water District (MWD) and PWP both have water supply contingency plans in place, including plans that consider statewide water shortages, catastrophic interruptions to water supplies, and up to a 50 percent reduction in water supplies. See Subsection 5.14.2.1 of the DEIR for detailed information about contingency planning related to Pasadena's water supply.

Pasadena is in an extreme drought period. In periods of extreme drought, the City relies on its Water Supply Shortage Plans (PMC 13.10) to ensure there is adequate water supply to meet the needs of the growing community. The Water Supply Shortage Plan has four levels of increasingly restrictive measures to address water shortages. Under a Level 4 Water Supply Shortage no new potable water service is permitted.

Despite ongoing drought conditions and threats to the state's water supplies, the City of Pasadena is not expected to experience a catastrophic shortage of water. As evaluated in Section 5.14 of the DEIR, water demand at buildout of the General Plan Update would represent less than a 1 percent increase over the existing demand. Although buildout of the General Plan Update would increase the City's population by 27,473 and its number of employees by 40,323, this growth would take place in a City that is largely built out geographically. Adding higher density housing and additional commercial space has not resulted in increased water demand in Pasadena. Despite significant development and population growth over the last fifty years, PWP's total water use is about the same as it was in 1960. New homes and businesses would largely be introduced in heavily urbanized areas of Pasadena where new uses would generally lessen the amount of land dedicated to turf or is otherwise irrigated. In addition, the City of Pasadena ensures that new development will consume water extremely efficiently by mandating the installation

3. Response to Comments

of water efficient fixtures as described in the California Green Building Code. Furthermore, implementation of existing and planned conservation measures would ensure that per-capita usage of water would decrease over the period covered by the General Plan Update.

Enforcement of existing regulations, conservation programs, and contingency plans are expected to ensure that water demands in Pasadena are met during the planning period of the General Plan Update. Section 5.14 of the DEIR includes a detailed rationale for this conclusion. Furthermore, large development projects in Pasadena allowed under the General Plan Update—such as those with 500 or more dwelling units and those employing more than 1,000 persons—would be required to prepare a water supply assessment (WSA) consistent with Senate Bill 610. These project-level WSAs would evaluate the availability of water to serve the proposed land uses.

City Efforts to Address Water Supply

In response to ongoing drought conditions, the City has taken measures to ensure that residents, businesses, and public facilities use water efficiently. Pasadena's Municipal Services Committee (MSC) has indicated its intent to expand local conservation efforts, with the goal of exceeding the water usage mandates imposed on PWP by the state. Level 2 water supply shortage conservation measures were adopted on June 1, 2015, consistent with Pasadena Municipal Code Chapter 13.10. Level 1 measures were in effect as of July 28, 2014 and included the following restrictions:

- Outdoor watering three days per week, on Tuesday, Thursday and Saturday, during the spring and summer months, April 1 through October 31. Property owners can water one day per week November 1 through March 31.
- No watering outdoors between 9 a.m. and 6 p.m., except with a handheld container or hose with a shutoff nozzle.
- No watering during periods of rain.
- All water leaks must be fixed within 72 hours.
- No excessive water flow or runoff onto pavement, gutters or ditches from watering or irrigating landscapes or vegetation of any kind.
- No washing down paved surfaces unless for safety or sanitation, in which case a bucket, a hose with a shutoff nozzle, a cleaning machine that recycles water or a low-volume/high-pressure water broom must be used.
- No washing vehicles except by using a handheld bucket or similar container or hose equipped with a water shutoff nozzle.

Level 2 measures restrict water to two days per week, on Tuesday and Saturday from April 1 through October 21, all water leaks must be fixed within 48 hours, and a prohibition on the filling of ornamental lakes and ponds.

3. Response to Comments

Conservation measures are also found in the Pasadena General Plan's adopted Open Space & Conservation Element and the proposed Land Use Element.

Water Projects

The City of Pasadena has a number of long range planning projects to increase water supply within the City as described on Page 5.14-18 of the DEIR. Additionally, on June 1, 2015, City Council approved the Arroyo Seco Canyon Project. This project is a partnership between PWP and the Arroyo Seco Foundation to expand the spreading area basin allowing additional capture of local water supplies. Implementation of the Arroyo Seco Canyon Project is estimated to increase groundwater recharge in the area by 1,100 acre-feet per year (afy) compared to existing conditions and will be completed at the end of 2016.

Conclusion

Water supply impacts of the proposed project are anticipated to be less than significant. No new impact to water supplies has been identified and no changes the conclusions of the DEIR are necessary.

- C1-4 The General Plan Update and DEIR was presented to the Environmental Advisory Commission on March 17, 2015. The commission's comments related to the proposed General Plan Update, Land Use Element, and Mobility Element, not the potential environmental impacts of the project. However, the comment is noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.
- C1-5 The General Plan Update and DEIR was presented to the Historic Preservation Commission on February 17, 2015. The commission's comments related to the street classification map, not the potential environmental impacts of the project. However, the comment is noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.
- C1-6 Without mitigation, the General Plan Update would not 1) physically divide an established community, 2) conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect, or 3) conflict with an applicable conservation plan. These thresholds are identified in Appendix G of the state CEQA Guidelines for land use and planning and have been utilized in this EIR. When impacts are not potentially significant pursuant to adopted thresholds, they are considered less than significant and no mitigation is necessary.
- C1-7 The commenter refers to Mitigation Measure 4-2, which is identified in Section 5.4, *Cultural Resources*, of the DEIR. This measure requires project applicants to provide paleontological studies and mitigation plans when applying for permits to grade within

3. Response to Comments

the Topanga formation. As the commenter indicates, the applicable area is primarily a single-family residential neighborhood. However, Mitigation Measure 4-2 is necessary to reduce paleontological resource impacts to a less than significant level. Since the area is generally built out and many new single family homes (or home remodels) would not require grading more than six feet deep, there would be no impact and this measure is not expected to apply to a large number of projects during the planning period of the General Plan Update. However, it would be required if a new discretionary project were proposed in that area.

C1-8 The 25-foot buffer was analyzed pursuant to the Federal Transit Administration (FTA) guidelines. Pursuant to the commenter's request we have revised the vibration sensitivity buffer distance to ensure adequate protection of all historic structures. Using worst case (upper range) vibrations from an impact pile driver, the standard distance attenuation calculation shows that 150 feet would be below the FTA vibration-induced architectural damage criterion. Mitigation Measure 9-4 has been modified, as shown below, to require that vibration studies be prepared for all vibration-intensive construction activities within 50 feet of sensitive receptors and eliminates the use of pile drivers within 150 feet of historic structures.

9-4 Prior to issuance of any construction permits, applicants for individual projects that involve vibration-intensive construction activities, such as pile drivers, jack hammers, bulldozers, and vibratory rollers, within 25 feet of sensitive receptors (e.g., ~~residences and historic structures~~) or 50 feet of historic structures, shall prepare and submit to the City of Pasadena Planning Division a study to evaluate potential construction-related vibration impacts. The vibration assessment shall be prepared by an acoustical engineer and be based on the FTA vibration-induced architectural damage criterion. If the study determines a potential exceedance of the FTA thresholds, measures shall be identified that ensure vibration levels are reduced to below the thresholds. Measures to reduce vibration levels can include use of less-vibration-intensive equipment (e.g., drilled piles and static rollers) and/or construction techniques (e.g., nonexplosive rock blasting and use of hand tools) and preparation of a preconstruction survey report to assess the condition of the affected sensitive structure. Notwithstanding the above, pile drivers shall not be allowed within 150 feet of any historic structures. Identified measures shall be included on all construction and building documents and submitted for verification to the City of Pasadena Planning Division.

C1-9 As discussed in Section 5.4, *Cultural Resources*, of the DEIR, the fact that a resource is not listed in or determined to be eligible for listing in the California Register of Historical Resources, or is not included in a local register of historical resources, does not preclude a lead agency from determining that the resource is a historical resource pursuant to CEQA. Section 17.62.090, *Alteration, Demolition, or Relocation of a Historic Resource*, of the Pasadena Zoning Code states that its provisions apply to a designated

3. Response to Comments

historic resource or “a historic resource eligible for designation.” Furthermore, the same section of the code states that the California State Historical Building Code also applies to an un-designated property if the Director of Planning and Permitting determines that the property qualifies for a historic designation.

- C1-10 Refer to response to Comment C1-8. Per the CEQA statute and state CEQA Guidelines, the purpose of mitigation is to avoid or minimize significant adverse impacts. Accordingly, Mitigation Measure 9-4 in Section 5.9 of the DEIR focuses on avoidance of potential vibration-related impacts to historic structures rather than allowing significant impacts to occur and then remediating them afterward. Furthermore, unmitigated construction-related vibration can cause more than cosmetic damage; it could destroy portions of historic structures that may be infeasible to fix by repairs and/or financial disbursements imposed after the damage has occurred.
- C1-11 Although most of the land use changes proposed by the General Plan Update are located in its eight Specific Plan areas, development and redevelopment projects could be constructed throughout the City. For this reason, analysis in Section 5.4 of the DEIR and the mitigation measures contained therein address protection of historic resources irrespective of their location. Therefore, a list of the City’s historic resources organized by Specific Plan would not illuminate new or greater impacts related to historic resources as analyzed by the DEIR.
- C1-12 Refer to response to Comment C1-5.
- C1-13 Section 5.4, *Cultural Resources*, of the DEIR determined that implementation of proposed General Plan Update policies and continued implementation of existing local, state, and federal regulations would ensure that impacts to historic resources would be less than significant. In particular, General Plan Update Policies LU 8.1 through LU 8.10 and Municipal Code Section 17.62.010 et seq. are specifically crafted to protect Pasadena’s historic resources—including resources that are eligible for historic designation but are not officially registered—from unnecessary demolition or excessive alteration.
- C1-14 Refer to response to Comment C1-8. Noise modeling and analysis was conducted for the General Plan Update and included in Appendix G and Section 5.9 of the DEIR. Mitigation Measures 9-1 through 9-4 identified in the DEIR include explicit references to impacts generated by specific types of vibration activities: “industrial projects” (Mitigation Measure 9-1), “development projects...” within “...screening distances for light rail transit” (Mitigation Measure 9-2), “individual projects that involve...construction activities” (Mitigation Measures 9-3 and 9-4). The measures do not imply that required noise and vibration studies would be required to analyze potential impacts from helicopter overflight.

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- C1-15 Under CEQA, the purpose of mitigation measures is to tangibly reduce or avoid significant adverse impacts. Where no potentially significant impacts are identified, no mitigation is necessary. Impacts 5.7-1 through 5.7-5, as identified in Section 5.7, *Hydrology and Water Quality*, of the DEIR, were determined to be less than significant upon implementation of regulatory requirements and standard conditions.
- C1-16 The distribution, scale, and overall design of development constructed in Pasadena during the planning period of the General Plan Update would be largely driven by market demands. A visual model representing buildout of the General Plan Update would require a large amount of speculation regarding future development. Furthermore, because neighborhoods in Pasadena—and the City as a whole—are not expected to be built out at maximum allowable building intensities, it would be misleading to create a visual representation of maximum allowable buildout. However, that growth scenario has been utilized and is useful for forecasting other types of environmental analysis (e.g., water supply, student generation), but not appropriate for assessing the future physical appearance of the City as a whole.
- C1-17 Comment noted.
- C1-18 The paleontological and cultural resources technical report included as Appendix E to the DEIR found five archeological resources in Pasadena: three known prehistoric resources and two historical archeological sites. Locations of these sites and the types of resources in them are kept confidential due to their sensitive nature. Because additional unknown archeological resources could theoretically be found anywhere in Pasadena, a map would not be useful for disclosure of potential impacts to such resources.
- C1-19 State laws related to discovery of human remains are listed under Subsection 5.4.5, *Existing Regulations and Standard Conditions*, of the DEIR and are not restated in the mitigation measures listed under Subsection 5.4.7. No revisions to the DEIR are necessary.
- C1-20 The City conducted a Native American Consultation pursuant to California Governmental Code Sections 6540.2, 65092, 65351, and 65352. On April 11, 2014, the City requested a list a tribes from the Native American Heritage Commission (NAHC). The NAHC sent a list of four tribes to contact for the government to government consultation on April 15, 2014. The City mailed a consultation request to each of the four tribes via certified mail. It was documented that all tribes received the certified mail on and between May 6, 2014 and May 22, 2014. The City received one call from Anthony Morales of the Gabrieleno/Tongva San Gabriel Band of Mission Indians. He requested recognition of inhabited areas along the Arroyo Seco and around Devil's Gate as areas that have the potential to yield significant archeological resources.

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In addition to the Native American Consultation, NAHC performed a Sacred Lands File service. This search failed to indicate the presence of Native American traditional cultural places on the project site or areas of potential effect.

- C1-21 The Archaeological Resources Protection Act of 1979 regulates the protection of archaeological resources and sites that are on federal and Indian lands. The commenter is correct in that there are several federally-owned parcels in Pasadena where this law applies.
- C1-22 The mitigation monitoring and reporting plan (MMRP) has been prepared as part of the FEIR and will be circulated with other components of the FEIR (such as this Response to Comments chapter). The MMRP contains mitigation measures already previously identified in the DEIR except where modified as part of this FEIR.
- C1-23 The General Plan Update and DEIR were presented to the Human Services Commission on March 11, 2015. The commission's comments related to the proposed General Plan Update, not the potential environmental impacts of the project. However, the comments are noted and will be provided to the decision-making body (and City Council) as part of the consideration of the General Plan Update adoption.
- C1-24 The General Plan Update and DEIR were presented to the Northwest Commission on March 12, 2015. The commission's comments related to the proposed General Plan Update, Land Use Element, and Mobility Element, not the potential environmental impacts of the project. However, the comments are noted and will be provided to the decision-making body (City Council) as part of the consideration of the General Plan Update adoption.
- C1-25 In 2013, the legislature passed Senate Bill 743 (SB 743) with the intention to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions (SB 743, Section 1(b)(2)). Among the mandates of SB 743 was for the State Office of Planning and Research (OPR) to adopt guidelines that establish an alternative to level of service (LOS), which is currently used to measure traffic congestion/auto delay under CEQA. Draft guidelines were published by OPR in July, 2014. These draft guidelines propose alternative metrics for analyzing traffic impacts, including vehicle miles traveled (VMT), similar to those adopted by the City of Pasadena. However, final guidelines are not expected until summer or fall of 2015. It is expected that the new guidelines would be phased in beginning in 2016.
- C1-26 Mitigation for the significant traffic impact at the intersection of Pasadena Avenue and California Boulevard would require conversion of one westbound through lane to a shared through/right-turn lane. Such mitigation would degrade the pedestrian environment by creating two lanes of right-turning traffic that would conflict with pedestrians crossing the north and east legs of the intersection, inconsistent with the

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General Plan Update’s goals and policies related to improving access to destinations by pedestrians. Therefore, no mitigation is considered feasible and the traffic impact at this intersection would be significant and unavoidable.

- C1-27 As shown in Subsection 7.5.13 of the DEIR, the Pasadena Avenue/California Boulevard intersection would operate at LOS F during the AM peak hour under the CD, SFO, and LA Alternative, as under the proposed project. The impact would be significant and unavoidable under both scenarios.
- C1-28 Please refer to Section 2.1, *Transportation Metrics*.
- C1-29 This comment relates to the land use planning implications of the General Plan Update and not the potential environmental impacts of the project. The City’s specific plans will be updated in a comprehensive manner, consistent with the General Plan Update, and anticipated to begin in Winter 2015/2016.
- C1-30 The commenter’s concerns regarding freeway-generated air quality impacts and air quality monitoring stations are addressed in Section 2.3, *Air Quality*, of the DEIR and Responses to Comments R6-1, R6-2, R7-2, and R7-4.
- C1-31 Pasadena has hundreds of historic homes and uncountable additional scenic resources. As mentioned in the table’s footnote, Table 5.1-1 is not intended to represent an exhaustive list of visual resources in Pasadena. Instead, it provides examples of well-known scenic resources in different areas of the City in order to illustrate the great number and broad range of such resources. However pursuant to the commenter’s request Table 5.1-1 has been updated to include historic single-family neighborhoods.

Table 5.1-1 Examples of Visual Resources in Pasadena

Specific Plan/Neighborhood	Visual Resource	Type of Visual Resource*
Specific Plan Areas		
Central District	<ul style="list-style-type: none"> • All Saints Episcopal Church • Castle Green/Green Hotel Apartments • Central Park • City Hall • Civic Auditorium • Colorado Boulevard • Memorial Park • Pasadena City Library • Pasadena Playhouse • St. Andrews Catholic Church 	<ul style="list-style-type: none"> • Historic resource • Historic resource • Foliage and greenery • Historic resource • Historic resource • Historic resource • Scenic corridor • Foliage and greenery • Historic resource • Historic resource • Historic resource
East Colorado	<ul style="list-style-type: none"> • Holliston Community Church 	<ul style="list-style-type: none"> • Historic resource
East Pasadena	<ul style="list-style-type: none"> • Municipal Light and Power Building • Former Stuart Pharmaceutical Building 	<ul style="list-style-type: none"> • Historic resource • Historic resource

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Table 5.1-1 Examples of Visual Resources in Pasadena

Specific Plan/Neighborhood	Visual Resource	Type of Visual Resource*
Fair Oaks/Orange Grove	<ul style="list-style-type: none"> La Pintoresca Library and Park 	<ul style="list-style-type: none"> Historic resource
Lincoln Avenue	<ul style="list-style-type: none"> Palm trees along Washington Boulevard 	<ul style="list-style-type: none"> Foliage and greenery
South Fair Oaks	<ul style="list-style-type: none"> Industrial/warehouse buildings Glenarm Power Plant fountain 	<ul style="list-style-type: none"> Unique visual character Historic resource
West Gateway	<ul style="list-style-type: none"> Colorado Street Bridge Maranatha High School/Ambassador Auditorium Landscaped yards of large estates Camphor, magnolia, and palm street trees U.S. Court of Appeals Bldg. 	<ul style="list-style-type: none"> Historic resource Landscaped grounds; Historic resource Foliage and greenery; unique visual character Foliage and greenery Historic resource
Outside Specific Plan Areas		
Northwest	<ul style="list-style-type: none"> Arroyo Seco/Brookside Park Corridor <u>Arroyo Terrace National Register Historic District</u> <u>Banbury Oaks Landmark District</u> Devils Gate Dam Hahamongna Watershed Park (Upper Arroyo) Gamble House <u>Pegfair Estates National Register Historic District</u> <u>Prospect National Register Historic District</u> Rose Bowl <u>Wotkyns-Richland Landmark District</u> 	<ul style="list-style-type: none"> Foliage and greenery <u>Historic resource</u> <u>Historic resource</u> Historic resource Foliage, topography, and greenery Historic resource <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> Historic resource <u>Historic resource</u>
Northeast	<ul style="list-style-type: none"> <u>Bristol-Cypress National Register Historic District</u> <u>Bungalow Heaven Landmark District/National Register Historic District</u> <u>Crawford's Vista Landmark District</u> Craftsman bungalows Eaton Canyon <u>Garfield Heights Landmark District</u> <u>Holliston Avenue Landmark District</u> <u>New Fair Oaks National Register Historic District</u> <u>Normandie Heights Landmark District</u> <u>North Pasadena Heights Landmark District</u> <u>Orange Heights National Register Historic District</u> <u>Raymond-Esther Landmark District</u> <u>Raymond-Summit National Register Historic District</u> St. Elizabeth of Hungary Catholic Church <u>Washington Square Landmark District</u> Westminster Presbyterian Church 	<ul style="list-style-type: none"> <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> Historic resource Foliage, topography, and greenery <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> Historic resource <u>Historic resource</u> Historic resource <u>Historic resource</u>

3. Response to Comments

Table 5.1-1 Examples of Visual Resources in Pasadena

Specific Plan/Neighborhood	Visual Resource	Type of Visual Resource*
		<ul style="list-style-type: none"> • Historic resource
Southeast	<ul style="list-style-type: none"> • California Institute of Technology • Historic homes (many in Spanish-derived architectural styles) • <u>Marengo-Pico Landmark District</u> • <u>Marguerita Lane National Register Historic District</u> • <u>South Hudson Avenue Landmark District</u> • <u>South Madison Landmark District</u> • <u>South Marengo National Register Historic District</u> • <u>South Oakland Landmark District</u> • Street trees (including camphor and palm trees on numerous streets) • <u>Tournament Fields Landmark District</u> 	<ul style="list-style-type: none"> • Landscaped grounds • Unique visual character • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • Foliage and Greenery • <u>Historic resource</u>
Southwest	<ul style="list-style-type: none"> • <u>Bellefontaine Landmark District</u> • Lower Arroyo Seco • <u>Lower Arroyo Seco National Register Historic District</u> • <u>Markham Place/Governor Markham National Register Historic District</u> • <u>Poppy Peak National Register Historic District</u> • <u>Ross Grove Landmark District</u> • San Rafael Hills • <u>South Grand-Covington Place Landmark District</u> • <u>Weston-Bungalowcraft Landmark District</u> 	<ul style="list-style-type: none"> • <u>Historic resource</u> • Foliage and greenery/natural habitat • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • Foliage, topography, and greenery • <u>Historic resource</u> • <u>Historic resource</u>
Citywide		
<ul style="list-style-type: none"> • Views of San Gabriel Mountains • Mature street trees • Public art 		<ul style="list-style-type: none"> • Scenic backdrop • Foliage and greenery • Artistic beauty
<p>* For discussion of officially designated historic landmarks, see Section 5.4, Cultural Resources, of this DEIR. Note: This table is not meant to represent an exhaustive list of visual resources in Pasadena. Instead, it provides examples of well-known scenic resources in different areas of the City.</p>		

C1-32 City staff also confirmed that the amount of units studied over the development caps for affordable housing was carried through the DEIR analysis. An example is shown on Page 5.1-42 of the DEIR.

C1-33 Commented noted.

C1-34 The Planning Commission had two opportunities to comment on the General Plan Update DEIR on February 11, 2015 and March 11, 2015. As confirmed at the hearing, the Planning Commission will be presented with the General Plan Update and FEIR.

C1-35 Please refer to Section 2.1, *Transportation Metrics*.

3. Response to Comments

- C1-36 Please refer to Section 2.1, *Transportation Metrics*.
- C1-37 Please refer to Section 2.1, *Transportation Metrics*, and response to Comment C1-26.
- C1-38 Please refer to Section 2.1, *Transportation Metrics*. Projects of community wide significance are required to conduct and mitigate for auto delay at intersections (see Appendix A of this FEIR).
- C1-39 The DEIR discloses that air quality impacts of the proposed project, including those related to consistency with SCAQMD thresholds, are significant and unavoidable. Population and employment growth greater than that analyzed in the DEIR would not change the significance conclusions identified for these impacts. Furthermore, buildout projections for the General Plan Update assume an optimistic growth scenario based on allowable building intensity and other factors. The City does not expect Pasadena to grow beyond those projections during the planning period of the General Plan Update.
- C1-40 Vibration studies, as required by Mitigation Measures 9-3 and 9-4, are required to consider the cumulative effects of vibration resulting from the project and adjacent construction projects that would affect the project site.
- C1-41 The commenter requested to understand what CEQA process would occur if changes are made to the Land Use Diagram after public review of the DEIR but before adoption of the General Plan Update. The Planning Commission may recommend changes to land uses in the City. Those changes would need to be evaluated within the context of the project as a whole to determine if it would result in any new significant environmental impacts. If new significant impacts are identified, or if a substantial increase in the severity of an environmental impact would result, then recirculation would be required pursuant to CEQA Guidelines Section 15088.5. However, minor changes that would not result in significant new impacts beyond those addressed in the DEIR would be documented in the staff report and findings and considered during General Plan Update adoption.
- C1-42 The General Plan Update and DEIR were presented to the Recreation and Parks Commission on March 17, 2015. The commission's comments related to the proposed General Plan Update, Land Use Element, and Mobility Element, not the potential environmental impacts of the project. However, the comments are noted and will be provided to the decision-making body (and City Council) as part of the consideration of the General Plan Update adoption.
- C1-43 The General Plan Update and DEIR were presented to the Senior Commission on March 10, 2015. The commission had no comments.
- C1-44 The General Plan Update and DEIR were presented to the Transportation Advisory Commission on February 26, 2015. The commission's comments are related to the

3. Response to Comments

proposed General Plan Update, Land Use Element, and Mobility Element, not the potential environmental impacts of the project. However, the comments are noted and will be provided to the decision-making body (and City Council) as part of the consideration of the General Plan Update adoption.

- C1-45 Section 15126.6(e)(2) of the CEQA Guidelines requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “no project” alternative is environmentally superior to the proposed project, “the EIR shall also identify an environmentally superior alternative among the other alternatives.” The City agrees with the commenter that the Efficient Transportation Alternative is also environmentally superior to the proposed project. As shown in Table 7-19 of the DEIR, the Central District, South Fair Oaks, Lincoln Avenue Alternative and the Efficient Transportation Alternative are both environmentally superior to the proposed project. However, the DEIR identifies the most environmentally superior alternative taking into account all environmental issues.
- C1-46 Achievement of the proposed project’s objectives, as listed in Subsection 7.1.2 of the DEIR, cannot be feasibly enumerated. For example, enhancement of “quality of life” (Objective 1) and achievement of “economic vitality” (Objective 5) cannot be quantified. Furthermore, the “Conclusion” subsection for each alternative analyzed in Section 7 of the DEIR identifies which objectives would not be met, or would be met to a lesser degree, by each respective alternative. A comparison of the environmental impacts of the alternatives is provided in Table 7-19.
- C1-47 The commissioner is correct in noting that the regional jobs-housing balance was not calculated for the project alternatives identified in Chapter 7, *Alternatives*, of the DEIR. The table below calculates the effect of the alternatives on regional jobs-housing balance.

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Table C1.1 Impact of Project Alternatives on Regional Jobs-Housing Balance

	Proposed Project	No Project/ Adopted General Plan Alternative	Central District, South Fair Oaks, and Lincoln Avenue Alternative	Efficient Transportation Alternative	Reduced Air Quality and Noise Impact Alternative
City of Pasadena					
Dwelling Units	71,953	66,113	70,152	71,914	72,078
Employment	151,671	148,532	146,023	149,345	151,444
Jobs-Housing Ratio	2.11	2.25	2.08	2.08	2.10
Difference between Alternative and 2035 SCAG Projections					
Dwelling Units (2035 SCAG Projection: 64,631)	7,322	1,482	5,521	7,283	7,447
Employment (2035 SCAG Projection: 131,300)	20,371	17,232	14,723	18,045	20,144
San Gabriel Valley plus Difference¹					
Dwelling Units (2035 SCAG Projection: 552,416)	559,738	553,898	557,937	559,699	559,863
Employment (2035 SCAG Projection: 728,700)	749,071	745,932	743,423	746,745	748,844
Jobs-Housing Ratio	1.34	1.35	1.33	1.33	1.34

¹ Figures for the number of dwelling units and employees in the SGV were calculated by adding 2035 SCAG projections for SGV with the difference in units and employees between 2035 SCAG projections for Pasadena and each respective project alternative.

As shown in the table, all of the alternatives have a similar impact on the San Gabriel Valley’s balance of jobs and housing, with values ranging from 1.33 to 1.35. Under all scenarios, the region would have a healthy jobs-housing balance that is close to that projected for the region in 2035 by the Southern California Association of Governments (SCAG). The impact of each alternative on the overall region is small due to the fact that the region’s jobs-housing ratio is largely a function of units and jobs elsewhere in the region. However, Pasadena is an important hub of jobs in the San Gabriel Valley, most of the region’s jobs (and dwelling units) are outside Pasadena.

Chapter 7 of the DEIR examines the respective traffic impacts of each alternative in regards to freeway mainline segments identified in the Los Angeles County Congestion Management Program (CMP). This analysis demonstrates how each growth scenario would affect the regional transportation network.

C1-48 The commission’s comments relate to the proposed General Plan Update, Land Use Element, and Mobility Element, not the potential environmental impacts of the project. However, the comments are noted and will be provided to the decision-making body (and City Council) as part of the consideration of the General Plan Update adoption.

4. Revisions to the Draft EIR

4.1 INTRODUCTION

This section contains revisions to the DEIR based upon (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of DEIR publication; and/or (3) typographical errors. This section also includes revisions to a mitigation measure to fully respond to commenter concerns as well as provide additional clarification to mitigation requirements included in the DEIR. The revision to the mitigation measure does not alter any impact significance conclusions as disclosed in the DEIR. Changes made to the DEIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions.

4.2 DEIR REVISIONS

The following text has been revised in response to comments received on the DEIR.

Page 4-3, Section 4, *Environmental Setting*, was modified as follows in response to Comment R1-1, from Joyce Dillard.

4.2.1.1 REGIONAL WATER QUALITY CONTROL BOARD

The City of Pasadena and its sphere of influence are in the jurisdictional area of the Los Angeles Regional Water Quality Control Board (LARWQCB). Requirements for avoiding or minimizing stormwater pollution from operation of development projects are in the LARWQCB's Order No. ~~01-182~~ R4-2012-0175, Waste Discharge Requirements for Municipal Separate Storm Sewer System ~~Water and Urban Runoff Discharges in the County of~~ within the Coastal Watersheds of Los Angeles County ("MS4 Permit") and National Pollution Discharge Elimination System (NPDES) Permit No. CAS004001, ~~most recently amended on April 14, 2011~~. MS4 permit requirements meet the ~~National Pollution Discharge Elimination System (NPDES)~~ regulations authorized by Section 402 of the Clean Water Act. The City of Pasadena is a co-permittee on the MS4 Permit and has adopted a Standard Urban Stormwater Mitigation Plan ordinance (Municipal Code Chapter 8.70) to ensure new developments comply with the MS4 Permit.

Page 4-4, Chapter 4, *Environmental Setting*, is hereby modified as follows in response to Comment A7-2, from Pasadena Heritage.

- **Central District.** Pasadena's Central District is the City's urban core and includes downtown Pasadena, Old Pasadena, the Civic Center/Midtown area, and the Playhouse District. Colorado Boulevard, which runs east-west through the Central District, is one of the region's premier retail destinations. The specific plan area features numerous historic and culturally important sites, including City Hall, ~~and~~ the Pasadena

4. Revisions to the Draft EIR

Playhouse, Central Park, and Memorial Park. Historic districts include the Old Pasadena, Pasadena Civic Center, Civic Center-Financial, and Pasadena Playhouse historic districts. The Central District is a dense, vibrant, and walkable mix of commercial, residential, and civic land uses. It is divided into seven subdistricts in the Central District Specific Plan.

Page 4-5, Chapter 4, *Environmental Setting*, is hereby modified as follows in response to Comment A7-3, from Pasadena Heritage.

- **South Fair Oaks.** The South Fair Oaks Specific Plan area is south of downtown Pasadena between South Pasadena Avenue to the west and South Arroyo Parkway (SR-110) to the east. The area is dominated by industrial uses and Huntington Hospital. However, it also features the Glenarm Power Plant with the historic Electric Fountain, and Art Center College of Design's south campus on South Raymond Avenue.
-

Page 4-6, Section 4, *Environmental Setting*, is hereby modified as follows in response to Comment A7-4, from Pasadena Heritage.

Unlike most of the City, which is dominated by urban development, the western portion of Pasadena is characterized by a sequence of open space areas that are oriented to the Arroyo Seco waterway. From north to south, they include Hahamongna Watershed Park, Central Arroyo Park (including Brookside Park), and Lower Arroyo Seco Park. Recreational and cultural amenities include the Brookside Golf Course, Rose Bowl stadium, Kidspace Children's Museum, and Rose Bowl Aquatics Center. As with the Arroyo Seco on the west side of the City, Eaton Wash in eastern Pasadena is a seasonal waterway that drains runoff from the San Gabriel Mountains to lower elevations in the City. The Central and Lower Arroyo areas are largely part of the Pasadena Arroyo Parks and Recreation District, which is listed on the National Register of Historic Places under the Cultural Landscape category. In addition, the Rose Bowl is a National Historic Landmark.

Page 4-9, Chapter 4, *Environmental Setting*, is hereby modified as follows in response to Comment A7-6, from Pasadena Heritage.

There are three known prehistoric resources in Pasadena, including two sites and a trail. There are also two historic archaeological sites, including an early 20th Century tourist camp and a trash deposit possibly associated with the San Rafael Ranch. Existing designated historic resources in the City include 131 resources listed on the National Register of Historic Places, including ~~2046~~ National Historic Districts and 3 National Historic Landmarks (NPS 2013); 1 State Point of Historical Interest; 2 State Historic Landmarks (OHP 2013); numerous City-designated landmarks, memorials, and monuments (Pasadena 2010); and ~~2047~~ City-designated Landmark Districts (Pasadena 2010). Part of SR-110, the Arroyo Seco Parkway Pasadena Freeway, is designated a National Scenic Byway (FHWA 2013). The City is well known for its large inventory of historic buildings, which include historic estates of early 20th Century business magnates, hundreds of Craftsmen-style bungalows, and numerous private and public buildings of note representing a wide diversity of architecture styles, including Victorian-era buildings, Period Revival style buildings, and Modern buildings.

4. Revisions to the Draft EIR

Page 4-12, Chapter 4, *Environmental Setting*, is hereby modified as follows in response to Comment A7-8, from Pasadena Heritage.

4.2.2 Scenic Features and Visual Resources

The City of Pasadena affords a variety of views of scenic landscapes and built environments. The San Gabriel Mountains, near the north City boundary, dominate the skyline from most of the City. The San Rafael Hills are along the western City boundary, and the Verdugo Mountains are further to the west. In addition, the Arroyo Seco corridor and Eaton Canyon traverse the western and eastern portions of the City, respectively. The City also offers scenic views of distinct architecture in the built environment, such as the Old Pasadena Historic District, Pasadena City Hall, Castle Green, St. Andrew Catholic Church bell tower, and Bungalow Heaven.

Section 5.1, *Aesthetics*, provides a detailed analysis of the City's scenic vistas, visual resources, and aesthetic character as well as the potential impact to the resources from buildout of the General Plan.

Page 4-12, Chapter 4, *Environmental Setting*, is hereby modified as follows in response to Comment A7-9, from Pasadena Heritage.

The City is served by numerous bus lines operated by Pasadena ARTS (Pasadena Area Rapid Transit System), Foothill Transit, and Metro. Other alternative modes of transportation in the City include services offered by the Los Angeles Department of Transportation (e.g. park-and-ride lots); Dial-A-Ride; the Gold Line (light rail line that links Pasadena to Union Station in Los Angeles); the LAX FlyAway bus service from Pasadena to LAX; and the City of Sierra Madre Gateway Coach. The Gold Line light-rail line (Metro Rail Service Line 804) extends north-south through the southwestern part of the City and continues eastward in the median of I-210, terminating near the eastern City boundary. The City also provides ample opportunities for bicycling via a network of bikeways, bicycle parking, links to transit, and other accommodations, as detailed in the City's Bicycle Transportation Plan (adopted in 2000 and last updated in 2011).

Page 5.1-1, Section 5.1, *Aesthetics*, is hereby modified as follows in response to Comment A7-14, from Pasadena Heritage.

- **Northwest Pasadena.** Outside of the Lincoln Avenue Specific Plan area, this section of Pasadena is characterized by a suburban, residential character. The area is bisected from north to south by the portion of the Arroyo Seco that contains the Rose Bowl, Brookside Golf Course, and other recreational amenities. The Rose Bowl, golf course, and Arroyo Seco corridor as a whole have historic value in addition to their recreational and aesthetic value. East of the Arroyo Seco and west of I-210 are residential neighborhoods that are mostly oriented to an orthogonal street grid. This grid and the regular placement of street trees give the area an orderly and modest small-town aesthetic. West of the Arroyo Seco are residential neighborhoods featuring larger homes on larger lots, many in the San Rafael Hills. The topography, scenic vistas, and mature tree canopy distinguish these homes and neighborhoods from other areas of the city.

4. Revisions to the Draft EIR

Page 5.1-2, Section 5.1, *Aesthetics*, is hereby modified as follows in response to Comment A7-14, from Pasadena Heritage.

- **East Colorado.** This area is a three-mile-long corridor extending eastward from Catalina Avenue to the eastern City boundary. It includes Allen Avenue from Colorado Boulevard to the Gold Line station at I-210. East Colorado Boulevard features a broad variety of commercial land uses. The visual character of the corridor varies widely, including auto-oriented areas with deficient pedestrian infrastructure and areas with wide sidewalks and businesses that front the sidewalk. Colorado Boulevard offers substantial eastward and westward views through the Specific Plan area and Pasadena. The area also includes multiple distinctive historic buildings, including the Holliston Avenue Methodist Church, H.G. Loud Auto Building, Howard Motor Company Building, Kindel Building, Saga Motor Hotel, and other auto-oriented uses associated with historic Route 66.

Page 5.1-3, Section 5.1, *Aesthetics*, is hereby modified as follows in response to Comment A7-12, from Pasadena Heritage.

- **South Fair Oaks.** The South Fair Oaks Specific Plan area is south of downtown Pasadena between South Pasadena Avenue to the west and South Arroyo Parkway (SR-110) to the east. The area is dominated by industrial uses and Huntington Memorial Hospital. Interspersed between industrial uses are commercial and public uses of varying building types and styles, giving the area an eclectic appearance and character. This varied visual environment includes some of the City's more adventurous and atypical architecture, as well as several important historic structures.

Table 5.1-1 on Page 5.1-4, Section 5.1, *Aesthetics*, is hereby modified as follows in response to Comment A7-14, from Pasadena Heritage.

Table 5.1-1 Examples of Visual Resources in Pasadena

Specific Plan/Neighborhood	Visual Resource	Type of Visual Resource*
Specific Plan Areas		
Central District	<ul style="list-style-type: none"> • All Saints Episcopal Church • Castle Green/Green Hotel Apartments • Central Park • City Hall • Civic Auditorium • Colorado Boulevard • Memorial Park • Pasadena City Library • Pasadena Playhouse • St. Andrews Catholic Church 	<ul style="list-style-type: none"> • Historic resource • Historic resource • Foliage and greenery • Historic resource • Historic resource • Historic resource • Scenic corridor • Foliage and greenery • Historic resource • Historic resource • Historic resource
East Colorado	<ul style="list-style-type: none"> • Holliston Community Church 	<ul style="list-style-type: none"> • Historic resource

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Table 5.1-1 Examples of Visual Resources in Pasadena

Specific Plan/Neighborhood	Visual Resource	Type of Visual Resource*
East Pasadena	<ul style="list-style-type: none"> • Municipal Light and Power Building • Former Stuart Pharmaceutical Building 	<ul style="list-style-type: none"> • Historic resource • Historic resource
Fair Oaks/Orange Grove	<ul style="list-style-type: none"> • La Pintoresca Library and Park 	<ul style="list-style-type: none"> • Historic resource
Lincoln Avenue	<ul style="list-style-type: none"> • Palm trees along Washington Boulevard 	<ul style="list-style-type: none"> • Foliage and greenery
South Fair Oaks	<ul style="list-style-type: none"> • Industrial/warehouse buildings • Glenarm Power Plant fountain 	<ul style="list-style-type: none"> • Unique visual character • Historic resource
West Gateway	<ul style="list-style-type: none"> • Colorado Street Bridge • Maranatha High School/Ambassador Auditorium • Landscaped yards of large estates • Camphor, magnolia, and palm street trees • U.S. Court of Appeals Bldg. 	<ul style="list-style-type: none"> • Historic resource • Landscaped grounds; Historic resource • Foliage and greenery; unique visual character • Foliage and greenery • Historic resource
Outside Specific Plan Areas		
Northwest	<ul style="list-style-type: none"> • Arroyo Seco/Brookside Park Corridor • <u>Arroyo Terrace National Register Historic District</u> • <u>Banbury Oaks Landmark District</u> • Devils Gate Dam • Hahamongna Watershed Park (Upper Arroyo) • Gamble House • <u>Pegfair Estates National Register Historic District</u> • <u>Prospect National Register Historic District</u> • Rose Bowl • <u>Wotkyns-Richland Landmark District</u> 	<ul style="list-style-type: none"> • Foliage and greenery • <u>Historic resource</u> • <u>Historic resource</u> • Historic resource • Foliage, topography, and greenery • Historic resource • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u>
Northeast	<ul style="list-style-type: none"> • <u>Bristol-Cypress National Register Historic District</u> • <u>Bungalow Heaven Landmark District/National Register Historic District</u> • <u>Crawford's Vista Landmark District</u> • Craftsman bungalows • Eaton Canyon • <u>Garfield Heights Landmark District</u> • <u>Holliston Avenue Landmark District</u> • <u>New Fair Oaks National Register Historic District</u> • <u>Normandie Heights Landmark District</u> • <u>North Pasadena Heights Landmark District</u> • <u>Orange Heights National Register Historic District</u> • <u>Raymond-Esther Landmark District</u> • <u>Raymond-Summit National Register Historic District</u> • St. Elizabeth of Hungary Catholic Church • <u>Washington Square Landmark District</u> 	<ul style="list-style-type: none"> • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • Foliage, topography, and greenery • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u> • <u>Historic resource</u>

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Table 5.1-1 Examples of Visual Resources in Pasadena

Specific Plan/Neighborhood	Visual Resource	Type of Visual Resource*
	<ul style="list-style-type: none"> Westminster Presbyterian Church 	<ul style="list-style-type: none"> Historic resource <u>Historic resource</u> Historic resource
Southeast	<ul style="list-style-type: none"> California Institute of Technology Historic homes (many in Spanish-derived architectural styles) <u>Marengo-Pico Landmark District</u> <u>Marguerita Lane National Register Historic District</u> <u>South Hudson Avenue Landmark District</u> <u>South Madison Landmark District</u> <u>South Marengo National Register Historic District</u> <u>South Oakland Landmark District</u> Street trees (including camphor and palm trees on numerous streets) <u>Tournament Fields Landmark District</u> 	<ul style="list-style-type: none"> Landscaped grounds Unique visual character <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> Foliage and Greenery <u>Historic resource</u>
Southwest	<ul style="list-style-type: none"> <u>Bellefontaine Landmark District</u> Lower Arroyo Seco <u>Lower Arroyo Seco National Register Historic District</u> <u>Markham Place/Governor Markham National Register Historic District</u> <u>Poppy Peak National Register Historic District</u> <u>Ross Grove Landmark District</u> San Rafael Hills <u>South Grand-Covington Place Landmark District</u> <u>Weston-Bungalowcraft Landmark District</u> 	<ul style="list-style-type: none"> <u>Historic resource</u> Foliage and greenery/natural habitat <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> <u>Historic resource</u> Foliage, topography, and greenery <u>Historic resource</u> <u>Historic resource</u>
Citywide		
	<ul style="list-style-type: none"> Views of San Gabriel Mountains Mature street trees Public art 	<ul style="list-style-type: none"> Scenic backdrop Foliage and greenery Artistic beauty

* For discussion of officially designated historic landmarks, see Section 5.4, Cultural Resources, of this DEIR.

Note: This table is not meant to represent an exhaustive list of visual resources in Pasadena. Instead, it provides examples of well-known scenic resources in different areas of the City.

Page 5.1-9, Section 5.1, *Aesthetics*, is hereby modified as follows in response to Comment A7-15, from Pasadena Heritage.

- Design Commission (Chapter 2.80).** This section of the Municipal Code establishes the City’s Design Commission. The Design Commission is tasked with fulfilling the Pasadena City Council’s declaration that the “achievement of quality in the architecture and urban design of the City is required in the interest of the prosperity, social and cultural enrichment, and general welfare of the people” (Pasadena 2014). The Commission is given the authority to develop City policies and standards related to

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community design, review development and redevelopment projects regarding aesthetic concerns, and make recommendations regarding environmental review documents.

A subsection of Chapter 2.80 establishes the City's Urban Forestry Advisory Committee. The code gives authority to the Design Commission to delegate review of matters pertaining to trees to the Urban Forestry Advisory Committee. The Design Commission also serves as the Historic Preservation Commission for properties within the Central District.

Page 5.4-23, Section 5.4, *Cultural Resources*, is hereby modified as follows in response to Comment A7-19, from Pasadena Heritage.

Specific examples include the potential for new commercial and mixed uses near the Bungalow Heaven and Historic Highlands Landmark Districts; medium mixed use, high density mixed use, and institutional classifications in the Pasadena Playhouse Districts; medium mixed use, high density mixed use, institutional, and high density residential in the Pasadena Civic Center ~~National Register Historic Landmark~~ District; and medium density residential uses in the Ross Grove Landmark District.

Page 5.4-23, Section 5.4, *Cultural Resources*, is hereby modified as follows in response to Comment A7-20, from Pasadena Heritage.

In addition to compliance with Policy LU 8.5, new development would be required to comply with the City's Design Guidelines for Historic Districts, which are based on the Secretary of the Interior's Standards for Historic Preservation. For example, areas along North Lake Avenue adjacent to the Bungalow Heaven National Register District and the Historic Highlands Landmark District would allow for Low Mixed Use (1-1.0 FAR), Low-Medium Mixed Use (0-1.75 FAR), and Low Commercial (0-1.0 FAR). Although the proposed Land Use Diagram would allow new uses with specific FARs adjacent to these landmark and historic districts, new development in this area would still need to comply with the North Lake Specific Plan and development standards (e.g., height, massing, and setback limitations) in Municipal Code Section 17.34.040 and the Urban Design, Sense of Place, and Architectural policies in the land use element. New development in the Pasadena Playhouse, Civic Center-Financial, and Pasadena Civic Center National Register Districts would be required to comply with the Central District Specific Plan and Design Guidelines for Historic Districts. Adherence to these development standards and design guidelines would ensure that infill development would maintain the character and context of the area, incorporate high quality architectural design, and be compatible with adjacent historical structures. Elements of the historic resources and landmarks that are character defining and convey the resources' significance, including all seven aspects of the resources integrity, would not be altered.

Page 1-30, Table 1-5 and Page 5.9-37, Section 5.9, *Noise*, is hereby modified as follows in response to Comment C1-8, from Historic Preservation Commission.

9-4 Prior to issuance of any construction permits, applicants for individual projects that involve vibration-intensive construction activities, such as pile drivers, jack hammers, bulldozers, and

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vibratory rollers, within 25 feet of sensitive receptors (e.g., residences ~~and historic structures~~) or 50 feet of historic structures, shall prepare and submit to the City of Pasadena Planning Division a study to evaluate potential construction-related vibration impacts. The vibration assessment shall be prepared by an acoustical engineer and be based on the FTA vibration-induced architectural damage criterion. If the study determines a potential exceedance of the FTA thresholds, measures shall be identified that ensure vibration levels are reduced to below the thresholds. Measures to reduce vibration levels can include use of less-vibration-intensive equipment (e.g., drilled piles and static rollers) and/or construction techniques (e.g., nonexplosive rock blasting and use of hand tools) and preparation of a preconstruction survey report to assess the condition of the affected sensitive structure. Notwithstanding the above, pile drivers shall not be allowed within 150 feet of any historic structures. Identified measures shall be included on all construction and building documents and submitted for verification to the City of Pasadena Planning Division.

Page 5.13-19, Figure 5.13-4, Section 5.13, *Transportation and Traffic*, is hereby modified as follows in response to Comment A1-12, from Bungalow Heaven Neighborhood Association.

See Figure 5.13-4 below.

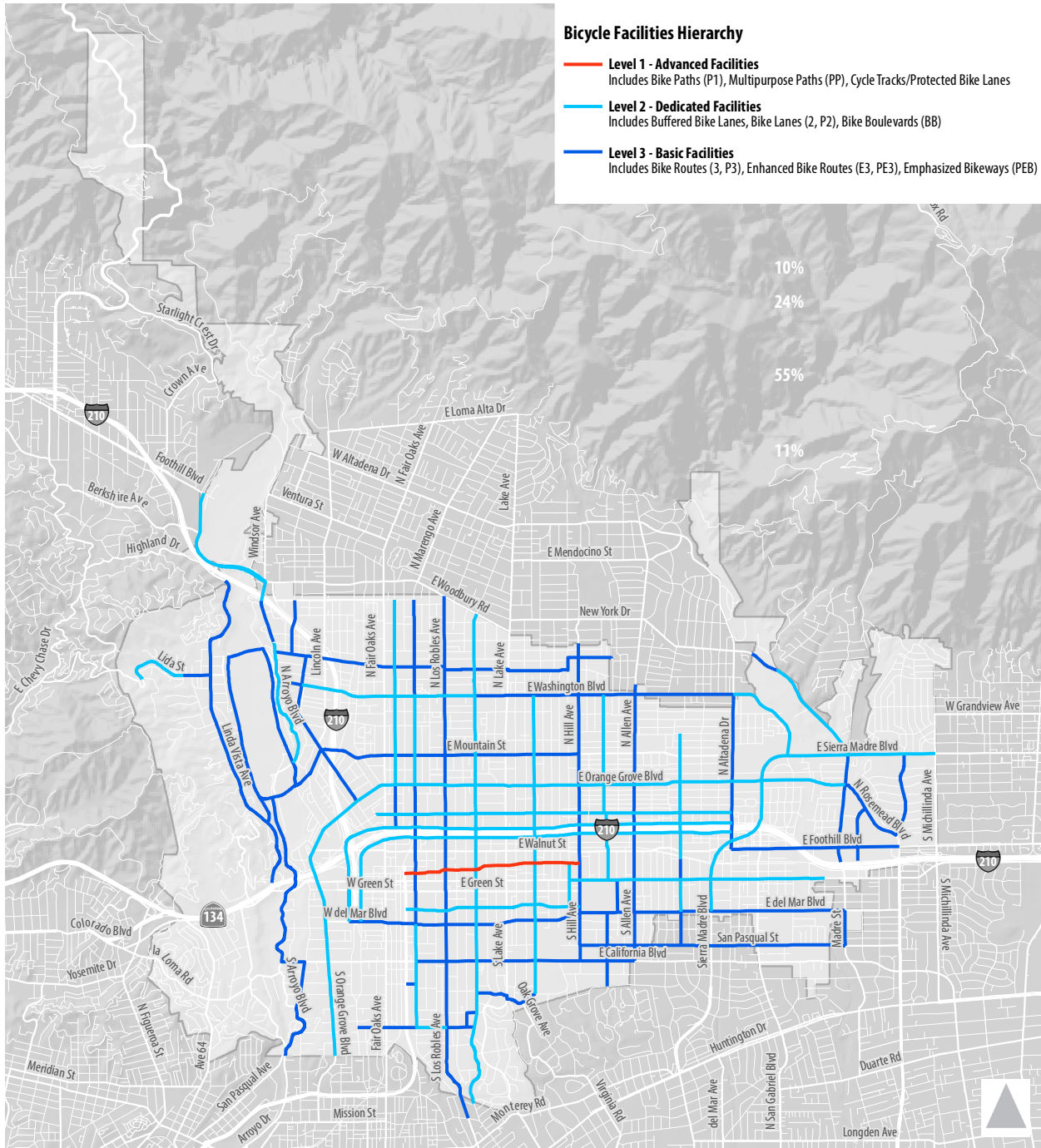
Page 7-15, Section 7.4.15, *Conclusion*, is hereby modified as follows in response to Comment A1-7, from Bungalow Heaven Neighborhood Association.

The No Project/Adopted General Plan Alternative would have similar impacts for aesthetics, biological resources, cultural resources, and noise. Impacts would be reduced for air quality, public services, recreation, and utilities and service systems. This alternative would result in an increase in impacts to ~~air quality~~, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, and transportation and traffic. Significant unavoidable adverse impacts identified by the proposed project for air quality, GHG emissions, and noise would not be eliminated. Although this alternative would eliminate the CMP arterial intersection impact at Pasadena Avenue and California Boulevard, it would create a new significant impact at Rosemead Boulevard and Foothill Boulevard. This alternative would also create a new significant impact by increasing VMT per capita over existing.

5. Environmental Analysis

Figure 5.13-4

Future Bicycle Network



Source: Fehr & Peers, 2015



CITY OF PASADENA
GENERAL PLAN UPDATE
DRAFT EIR



PRA-06.0L

7/9/2015

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Page 7-39, Section 7.8, *Environmentally Superior Alternative*, is hereby modified as follows in response to Comment A1-7, from Bungalow Heaven Neighborhood Association.

Table 7-19 Comparison of Alternatives to the Proposed Project

Environmental Resource Area	Project	No Project/Adopted General Plan Alternative	Central District, South Fair Oaks, and Lincoln Avenue Alternative	Efficient Transportation Alternative	Reduced Air Quality and Noise Impact Alternative
Aesthetics	LTS	0	0	0	0
Air Quality	S/U	+ ₋	-	-	-
Biological Resources	LTSM	0	0	0	0
Cultural Resources	LTSM	0	-	0	0
GHG	S/U	+	-	-	+
Hazards and Hazardous Materials	LTS	+	-	0	+
Hydrology and Water Quality	LTS	+	0	0	0
Land Use and Planning	LTS	+	0	0	-
Noise	S/U	-	-	-	0
Population and Housing	LTS	+	0	0	0
Public Services	LTS	-	-	-	+
Recreation	LTS	-	-	-	+
Transportation and Traffic	S/U	+ ¹	0	0	- ²
Utilities and Service Systems	LTS	-	-	-	+

LTS – Less Than Significant

LTSM – Less Than Significant with Mitigation

S/U – Significant and Unavoidable

(+) = Impact considered greater when compared with the proposed project.

(0) = Impact considered neutral when compared with the proposed project.

(-) = Impact considered less when compared with the proposed project.

¹ The No Project/Adopted General Plan Alternative eliminates one significant unavoidable CMP arterial intersection impact at Pasadena Avenue and California Boulevard. However, it would create a new significant unavoidable CMP impact at Rosemead Boulevard and Foothill Boulevard and a new significant impact by increasing VMT per capita over existing.

² The Reduced Air Quality and Noise Impact Alternative eliminates one significant unavoidable CMP arterial intersection at Pasadena Avenue and California Boulevard. However, like the proposed project this alternative would result in the following significant CMP impacts: a significant impact on I-210 w/o Rte 134/710 in the PM peak hour for westbound lanes and on I-210 w/o Rosemead Boulevard in the AM peak hour for westbound lanes.

4.3 ADDITIONAL DEIR REVISIONS

The following text has been revised to update information or correct typographical errors.

Page 1-7, Table 1-3, Chapter 1.4.1, *General Plan Update*, is hereby modified as follows:

4. Revisions to the Draft EIR

Table 1-3 Pasadena General Plan Update: Net Projections

Specific Plan	Residential ¹			Nonresidential Square Feet ²					
	Acres	Dwelling Units	Population	Retail Acres	Office Dwelling Units	Industrial	Institutional Acres	Total Nonresidential Dwelling Units	Employees
Central District	801	6,147	12,374	1,002,941	2,774,256	-109,770	179,222	3,846,649	13,529
South Fair Oaks	253	1,078	2,220	344,469	1,565,053	-527,474	412,459	1,794,506	7,124
East Colorado	299	361	755	391,200	734,740	-170,953	-31,388	923,600	2,853
East Pasadena	245	1,442	3,099	-318,312	1,854,643	-428,456	0	1,107,875	5,662
North Lake	143	316	649	160,513	172,173	-44,866	-32,453	255,366	771
Fair Oaks/ Orange Grove	210	323	870	503,221	427,856	-211,595	-410,497	308,984	760
Lincoln Ave	73	210	433	352,626	242,557	-259,653	-37,117	298,413	1,027
West Gateway ³	0	418	835	163,950	157,325	-14,800	-100,000	206,475	729
No Specific Plan	12,779	2,017	6,237	837,898	1,889,774	-574,890	94,309	2,247,091	7,866
Total	14,803	12,312	27,473	3,438,505	9,818,377	-2,342,457	74,535	10,988,959	40,323

Source: City of Pasadena, August 2013; Fehr & Peers 2014.

¹ Dwelling unit projections include development caps, affordable housing estimates, and previously approved but not yet built units.

² Nonresidential square feet projections include development caps and previously but not yet built nonresidential space.

³ The General Plan Update includes a policy to sunset the West Gateway Specific Plan in the future; however, it is included here to show the location of buildout.

Page 2-2, Chapter 2, *Introduction*, is hereby modified as follows:

The City of Pasadena determined that an EIR would be required for this project and issued a Notice of Preparation (NOP) and Initial Study on September 5, ~~2014~~2013 (See Appendix B). Comments received during the public review period, which extended from September 5, 2013, to October 21, 2013, are contained in Appendix C and summarized in Subsection 1.8 of Section 1, *Introduction*, of this DEIR.

Page 5.10-2, Chapter 5.10, *Population and Housing*, is hereby modified as follows:

2014–2021 Pasadena Housing Element

The City's most recent housing element was adopted by City Council on February 3, 2014. For the 2014–2021 planning period, SCAG determined that Pasadena's RHNA allocation was 1,332 units. Consistent with state housing law, the 2014–2021 Housing Element demonstrates that the City can accommodate its RHNA allocation through the construction of planned residential projects and utilization of its inventory of appropriate housing sites. The Housing Element also identifies goals, policies, and programs designed to address the City's overall housing needs.

Page 5.11-7, Chapter 5.11, *Public Services*, is hereby modified as follows:

As the City's population increases, additional fire stations or expansions may be required. Various localized environmental impacts related to new construction or redevelopment of fire stations could occur. In addition to the stations currently identified for replacement (Stations 33 [not funded], 36, 37, and 38 [all funded]) and

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improvements (Station 31 [not funded]), additional stations or improvements may be required. Any new or expanded fire stations that may be required to serve the City at General Plan buildout will be identified in the forthcoming Standards of Coverage document. Development and operation of new stations in permitted land use designations have been considered in the General Plan Update buildout and analyzed throughout this DEIR, since it analyzes anticipated effects of citywide growth related to air quality, noise, traffic, utilities, and other environmental impact areas. In addition, if construction impacts of a development project necessitate the closure of roadways that serve a particular project, the applicant would be required to coordinate road closures and emergency access with PFD to ensure an adequate level of fire protection services at the adopted service levels.

The CMP impact at Rosemead Boulevard and Foothill Boulevard is an impact of the No Project/Adopted General Plan Alternative and not an impact of the proposed General Plan Update (see Transportation Analysis Report in Appendix D of this FEIR). This was a typographical error. Page 5.13-33, Chapter 5.13, *Transportation and Traffic*, is hereby modified as follows:

Arterial Intersections

- **Pasadena Avenue and California Boulevard (CMP ID #120)** – this location is impacted in the AM peak hour. The mitigation measure identified for this location is the conversion of one westbound through lane to a shared through/right-turn lane. This mitigation measure would degrade the pedestrian environment by creating two lanes of right-turning traffic that would conflict with pedestrians crossing the north and east legs of the intersection, inconsistent with the General Plan’s goals and policies related to improving access to destinations by pedestrians.
- ~~**Rosemead Boulevard and Foothill Boulevard (CMP ID #121)** – in Scenario 2, this location is impacted in the PM peak hour. The mitigation measure identified for this location is the conversion of one northbound through lane to a shared through/right turn lane. This mitigation measure would degrade the pedestrian environment by creating two lanes of right turning traffic that would conflict with pedestrians crossing the south and east legs of the intersection, inconsistent with the General Plan’s goals and policies related to improving access to destinations by pedestrians.~~

4.3.2 Level of Significance After Mitigation

Impact 5.13-1

Implementation of Mitigation Measure 13-1 would ensure that citywide improvements are funded through the City’s transportation impact fee program, thereby reducing impacts to a less than significant level.

Impact 5.13-2

There are no feasible mitigation measures available to reduce impacts to CMP freeway segments and arterial intersections to below a level of significance. For the reasons stated above, improvements to freeway segments require an additional mainline travel lane, which either requires removal of a left hand shoulder resulting in substandard freeway conditions or there is insufficient existing right-of-way. Increasing

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automobile capacity through roadway widening is also inconsistent with the General Plan's goals and policies. Mitigation for Pasadena Avenue and California Boulevard would require conversion of one westbound through lane to a shared through/right-turn lane. ~~Mitigation for Rosemead Boulevard and Foothill Boulevard would require the conversion of a northbound through lane to a shared through/right-turn lane.~~ As discussed above, these mitigation measures would degrade the pedestrian environment and are inconsistent with the proposed General Plan's goals and policies related to improving access to destinations by pedestrians.

Page 6-3, Chapter 6, *Significant Unavoidable Adverse Impacts*, is hereby modified as follows:

Traffic

Impact 5.13-2: There are no feasible mitigation measures available to reduce impacts to CMP freeway segments and arterial intersections to below a level of significance. Improvements to freeway segments require an additional mainline travel lane, which either requires removal of a left hand shoulder resulting in substandard freeway conditions or there is insufficient existing right-of-way. Increasing automobile capacity through roadway widening is also inconsistent with the General Plan's goals and policies. Mitigation for Pasadena Avenue and California Boulevard would require conversion of one westbound through lane to a shared through/right-turn lane. ~~Mitigation for Rosemead Boulevard and Foothill Boulevard would require the conversion of a northbound through lane to a shared through/right-turn lane.~~ These mitigation measures would degrade the pedestrian environment and are inconsistent with the proposed General Plan's goals and policies related to improving access to destinations by pedestrians.

Page 11-1, Chapter 11, *Organizations and Persons Consulted*, is hereby modified as follows:

Pasadena Office of the City Attorney

Theresa Fuentes, Assistant City Attorney

Pasadena Planning and Community Development Department

Vincent P. Bertoni, AICP, Director

David Reyes, Deputy Director

Arthi Varma, Principal Planner

David Sinclair, Senior Planner

Vicrim Chima, Planner and General Plan Manager

Scott Reimers, Planner

Martin Potter, Associate Planner

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Pasadena Department of Transportation

Fred Dock, Director

Mark Yamarone, Transportation Administrator

Jenny Cristales, Associate Planner

Environmental Consultant to the City

John Bellas, LEED AP , Michael Baker International

The Final Transportation Analysis Report is provided herein in Appendix D of this FEIR. Minor changes were made to Table labels to correlate the Scenario numbers with the names of alternatives that were analyzed in Section 7.0 of the DEIR for consistency. Additionally Figure 5 “2035 Bicycle Network” was updated as discussed in Section 4.2 above.

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5. Errata to FEIR dated July, 2015

The following constitute revisions to the Final Environmental Impact Report (FEIR) for the Pasadena General Plan Update dated July, 2015. They include response to comment letters that were inadvertently omitted in the FEIR released for public review on July 14, 2015 and edits aimed at updating information and/or correcting typographical errors. This Errata was distributed to commenters and posted on the City's website on July 22, 2015.

5.1 MISCELLANEOUS ADDITIONAL REVISIONS TO THE FEIR

Page 5.1-3, Section 5.1, *Aesthetics*, is hereby modified as follows in response to Comment A7-12, from Pasadena Heritage.

Table 5.10-3 Adopted SCAG Growth Forecasts

Forecast	City of Pasadena ¹		San Gabriel Valley ²		Increase, 2013–2035		Percent Increase, 2013–2035	
	2020	2035	2020	2035	Pasadena	SGV ²	Pasadena	SGV ²
Population	143,400	152,500	1,588,100	1,714,300	13,885 12,480	202,341	10%	13.4%
Households	58,400	61,400	496,200	524,800	5,422	57,495	9.7%	12.3%
Employment	124,400	131,300	708,600	728,700	19,299 19,952	44,000	17.2%	6.4%

Source: SCAG 2012.

¹ Note that SCAG projections are for the City only and not the entire planning area or the City's sphere of influence.

² Population estimates for the SGV were calculated using estimates for the 31 cities that compose the SGVCOG's definition of the region and do not include for the region's unincorporated areas.

5. Errata to FEIR dated July, 2015

5.2 RESPONSE TO COMMENTS

Comment letters are followed by responses to specific numbered comments. References are made to information provided in the Draft Environmental Impact Report (DEIR) and FEIR.

Nicole Morse

Subject: FW: Comments and Questions for General Plan Draft EIR
Attachments: Pasadena.StreetSegments.08.09.14.pdf; ATT00001.htm; ProposedMobilityMetrics.pdf; ATT00002.htm

From: <Vince.Farhat>

>
Date: March 15, 2015 at 10:46:12 AM PDT
To: <davidreyes>
Subject: **Comments and Questions for General Plan Draft EIR**
David:

Many thanks to you and Varma for preparing the thoughtful March 11 response to my request for information. The information you provided was very helpful.

The following are my comments and questions on the draft Environmental Impact Report for the General Plan (DEIR). Please send my comments to the appropriate City Staff members for inclusion in the public record. 1

Background

As you know, the Planning Commission voted not to endorse DOT's new transportation performance metrics. Some Commissioners (myself included) believed that DOT Staff failed to adequately explain the policy ramifications of using the new metrics. In addition, some Commissioners were concerned that the new metrics would greatly understate potential traffic impacts of new development. At some point during the Commission's deliberations, and in light of the State not yet finalizing the new metrics, DOT Staff indicated to the Planning Commission that they would run both sets of metrics (then-current and proposed) in the DEIR. As you know, however, the City's former metrics are not included in the DEIR. Only the new metrics are used.

Comments and Questions for the DEIR

Because it utilizes transportation metrics that understate traffic impacts, the DEIR in its current form is inadequate to the extent it understates the potential traffic and transportation impacts of full build-out under the proposed General Plan. My specific comments and questions are as follows:

(1) The attached memorandum dated September 9, 2014 is incorporated herein by reference.

- Does the DEIR utilize the Street Segment mobility performance measure in analyzing potential transportation impacts in the General Plan? 2
- If it does not, please provide a substantive narrative response to the issues addressed in the September 9, 2014 memorandum.
- Regardless of the City's narrative response to the memorandum, how would the DEIR's transportation analysis change if Street Segments were included in the review of potential traffic impacts?
- In explaining the possible changes, please provide a "before and after" comparison, *i.e.*, the current DEIR transportation analysis versus what the DEIR's analysis would be if Street Segments were used. 3

1

5. Errata to FEIR dated July, 2015

- (2) The attached memorandum dated July 18, 2014 is incorporated herein by reference. | 4
- Does the DEIR explain why the General Plan will not utilize non-auto mobility performance metrics in combination with more traditional auto metrics that evaluate potential traffic impacts for future development? | 4
 - If it does not, please provide a substantive narrative response to the issues addressed in the July 18, 2014 memorandum. | 5
 - Regardless of the City's narrative response to the memorandum, how would the DEIR's transportation analysis change if more traditional auto metrics were included in the review of potential traffic impacts? | 6
 - In explaining the possible changes, please provide a "before and after" comparison, *i.e.*, the current DEIR transportation analysis versus what the DEIR's analysis would be if Pasadena's former (old) metrics were used. | 7

(3) If the City's response to comment 2 above shows that the traffic impacts under the old metrics would be greater than the impacts under the new metrics, what additional transportation measures would be necessary in order to mitigate the increased traffic impacts? | 8

(4) If the City's response to comment 3 above shows that the increased traffic impacts cannot be completely mitigated, what changes would be required in drafting a proposed Statement of Overriding Considerations under CEQA? | 8

(5) The original Planning Commission- and Staff-recommended Land Use alternative (which is identified in the DEIR as the "Central District, South Fair Oaks and Lincoln Avenue" alternative) has been deemed the environmentally-superior alternative. Would this alternative continue to be environmentally-superior under the old metrics? | 9

| 9

Please let me know if you have any questions or need any additional information. Thanks in advance to all Staff members for responding in writing to my comments to the DEIR. | 10

Best,

Vince Farhat | City of Pasadena Planning Commission
At-Large Commissioner
Phone: (626) 375-6619

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5. Errata to FEIR dated July, 2015

City of Pasadena Transportation Planning Memorandum

DATE: September 9, 2014

TO: Mayor & City Council
Planning Commission
Department of Transportation

RE: "STREET SEGMENT" MOBILITY PERFORMANCE MEASURE FOR
TRANSPORTATION IMPACT ANALYSIS AND THRESHOLDS FOR CEQA

INTRODUCTION:

On September 10, 2014, the City of Pasadena Planning Commission will continue its review of proposed new mobility performance measures for transportation impact analysis and thresholds for California Environmental Quality Act (CEQA) analysis (hereinafter "Proposed Mobility Measures"). The Proposed Mobility Measures are being considered as part of the ongoing update of the City of Pasadena General Plan.¹

Pasadena's "Street Segment" mobility performance measure currently applies to all projects and all streets. The Street Segment metric analyzes the amount of new auto traffic a proposed project would add to adjacent streets. It is a sensitive traffic performance metric that identifies changes to vehicle volumes on all streets, including residential streets.

The Pasadena Department of Transportation (DOT) now wants to exclude Street Segments from CEQA analysis for future development projects. DOT also seeks to exempt multifamily residential projects from Street Segment consideration, and limit Street Segment analysis to only "access" and "neighborhood connector" streets.

Pasadena should continue to use Street Segments for CEQA review of future development projects. Unless the proposed "per capita" Vehicle Miles Traveled (VMT) and Vehicle Trips (VT) performance metrics are changed to make them more meaningful, the only way to guarantee some degree of credible traffic analysis is to keep Street Segments as a CEQA measure. Without Street Segments, the public and policymakers will never know how future development projects would impact auto traffic in the Central District.

¹ On July 23, 2014, the Planning Commission voted unanimously to recommend adoption of three proposed smart growth mobility metrics that will measure proximity and quality of bicycle networks, pedestrian accessibility, and proximity and quality of transit measures. As part of the motion, the Planning Commission recommended that Pasadena's transportation ordinances be amended to allow for the payment of bicycle and pedestrian amenities through the City's development impact fees.

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All development projects should continue to be analyzed under the Street Segment metric. Multifamily and mixed-use developments including housing constitute a significant portion of recent and currently-proposed development projects. "Carving-out" multifamily residential from project-specific analysis would undercut the public's and policymaker's ability to measure and evaluate citywide traffic impacts during the CEQA process. Moreover, all streets should continue be analyzed under the Street Segment metric.²

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BACKGROUND:

DOT has traditionally focused on promoting smart growth and enhancing neighborhood quality of life. Toward that end, the 2004 General Plan Mobility Element built upon the foundation of the 1994 General Plan in adopting important neighborhood protection principles for transportation planning. These principles include "de-emphasized" streets³, Neighborhood Traffic Management Programs (NTMP),⁴ and "Street Segment" traffic analysis for CEQA review of proposed development projects.⁵

Currently, the CEQA Street Segment mobility performance measure applies to all projects and all streets. The Street Segment metric studies the amount of new auto trips a development project will add to adjacent streets.⁶ It is a sensitive traffic performance metric with a low impact threshold that identifies changes to vehicle volumes on all streets, including residential streets.⁷

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DOT originally sought to eliminate Street Segment analysis altogether.⁸ On June 25, 2014, in response to comments from Planning Commissioners, DOT revised its position and proposed that a modified type of Street Segment analysis be utilized in connection with project-specific neighborhood protection programs.⁹ However, DOT wants to exclude Street Segments from CEQA analysis for future development projects.¹⁰ In addition, DOT proposes to exempt

² As discussed below, the City should revise the current Street Segment impact thresholds in order to address the legitimate concern that the current thresholds are overly-sensitive.

³ See 2004 General Plan Mobility Element § 4.1.3.1

⁴ *Id.* § 3.2.3

⁵ See DOT Staff Report dated June 11, 2014, p. 9.

⁶ *Id.*

⁷ *Id.*

⁸ See DOT Staff Report dated April 9, 2014, pp. 2-4 (describing new performance measures without any reference to Street Segments); DOT Staff Report dated June 11, 2014, pp. 9-10 (describing purported disadvantages of Street Segment analysis).

⁹ See DOT Staff Report dated June 25, 2014, p. 5 & Attachment 4.

¹⁰ *Id.*

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multifamily residential projects from Street Segment analysis and wants to limit such analysis to only “access” and “neighborhood connector” streets.¹¹

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STREET SEGMENTS SHOULD BE RETAINED IN CEQA ANALYSIS OF FUTURE PROJECTS:

A. Street Segments Give Critical Public Notice of Potential Auto Traffic Impacts

DOT acknowledges that the current Street Segment metric identifies changes to vehicle volumes on all streets, but contends that the metric is not consistent with the land use densities identified in the General Plan, that auto trips associated with some residential projects are not *per se* cut-through traffic, and that sometimes Street Segment traffic impacts cannot be mitigated.¹² But experience has taught us that Street Segment analysis is an important tool in the CEQA process to give public notice of potential traffic impacts.

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The City has appropriately applied Street Segment analysis to both large projects such as Westgate and smaller, neighborhood-oriented projects such as Desiderio. It is reasonable to require Street Segment traffic analysis for important projects of citywide significance in a community such as Pasadena that is committed to sustainable development and neighborhood protection. Street Segment analysis is an important tool in assessing traffic volume growth impacts, and potentially also a valuable tool to ensure traffic safety. Bikers and walkers can look to Street Segment traffic impacts to help understand a project’s potential impacts on their activities.

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DOT’s argument that some Street Segment impacts cannot be mitigated is a red-herring. Numerous development projects have been approved by the City Council through Statements of Overriding Consideration (SOC) as permitted by CEQA. If the Council determines that the benefits of a project outweigh the traffic impacts, the Council can certify the final EIR and the project will go forward. Without Street Segment analysis, however, the public and policymakers will lose a critical insight into the potential and collateral traffic impacts of future development. We are currently seeing a significant post-recession surge in development in the Central District and Specific Plan areas. Going forward, citizens and policymakers must be able to gauge potential usability of the streets for all users (pedestrians, bikers, autos), so that we may take appropriate mitigation measures to ensure the success of the numerous upcoming projects—both now entitled and proposed.

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¹¹ June 25 Report, Attachment 4. DOT also seeks to revise the impact threshold that would require neighborhood traffic calming measures. As discussed below, I agree the current impact threshold should be revised, but would defer that topic to upcoming Planning Commission meetings.

¹² See DOT Staff Report dated June 25, 2014, p. 10 & Attachment 1.

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Pasadena's longstanding use of Street Segments as a CEQA metric is squarely consistent with the practices of other local governments. Numerous California jurisdictions employ different iterations of Street Segment analysis in their CEQA review of development projects, including Santa Barbara, Beverly Hills, Fremont, and Los Angeles.¹³

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B. Retaining Street Segments as a CEQA Measure is Critically Important in Light of the City's Move Toward VMT and VT Performance Measures Within Pasadena TPAs

As currently proposed, the "per capita" Vehicle Miles Traveled (VMT) and Vehicle Trips (VT) performance metrics are illusory. None of the projects in DOT's initial "case studies" had significant traffic impacts under the VMT and VT performance measures. Unfortunately, this is by design; a project's traffic impacts would be so diluted that they would be reflected as less than a "drop" in the citywide traffic "bucket". That's why DOT staff has conceded that it would be almost impossible for a single project to trigger the impact thresholds under citywide per capita parameters.¹⁴

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If we adopt these meaningless VMT and VT metrics, future development projects in the Central District would get a "free pass" from CEQA traffic analysis and mitigation. Without Street Segment CEQA measures, future project environmental impact reports (EIRs) would effectively skip meaningful public traffic review since it would be virtually impossible for individual projects to trigger VMT and VT thresholds. The transportation "experts" would tell Pasadena residents time and again that large development projects do not create "significant" traffic impacts for adjacent residential and commercial neighborhoods. But it would strain common sense to say that large projects, even those adjacent to transit, have no significant traffic impacts.

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Unless the proposed VMT and VT performance metrics are modified to make them more meaningful, the only way to ensure credible traffic analysis and mitigation is to retain Street Segments as a CEQA measure. Without Street Segments, the public and City Council will never really know how future development projects would impact auto traffic in the Central District. Therefore, retaining Street Segments as a CEQA measure is critically important in light of the City's move toward VMT and VT performance measures within Pasadena TPAs.

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¹³ See, e.g., DOT Staff Report dated June 11, 2014, Attachment 2 (LADOT Street Impact Criteria Guidelines). If DOT staff contends their proposal to eliminate Street Segments as a CEQA metric is somehow consistent with current best practices in other cities, Staff should provide the Planning Commission with a detailed survey of other cities' Street Segment policies.

¹⁴ The VMT Per Capita measure sums the miles traveled for trips within DOT's citywide traffic model. The Citywide VMT is then divided by the City's total service population (population plus the number of jobs) per capita. The VT Per Capita metric measures motor vehicle trips associated with the City by summing trips with origins and destinations within Pasadena as generated by the citywide traffic model. Therefore, VMT and VT would measure a real estate development project's potential traffic impacts on a per person basis across the entire City.

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STREET SEGMENT ANALYSIS SHOULD APPLY TO ALL FUTURE PROJECTS AND ALL STREETS:

DOT wants to exempt multifamily residential projects from Street Segment analysis. Staff offers no clear rationale for its recommendation, except that multifamily projects are already accounted for in the zoning code. But DOT's recommendation ignores the obvious (and undisputed) fact that new multifamily residential projects generate auto traffic. Just because future development projects might be anticipated in the zoning code does not make the traffic disappear. Nor should the City limit Street Segment analysis to only two types of streets. The City should continue its current practice of evaluating potential traffic impacts on all streets, including commercial corridors.

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It appears the underlying agenda is to help multifamily housing developers avoid future traffic-related EIRs. During a Planning Commission meeting, a local architect argued for the elimination of Street Segment analysis because the metric sometimes triggers EIRs for otherwise compliant development projects and such EIRs are an "unreasonable burden" for infill development.¹⁵ During public comment at a City Council meeting, one speaker identifying herself as a multifamily housing developer stated that EIRs are "very costly," "very time consuming", and the "bane of everyone's existence".¹⁶ The developer added that she hoped the City Council would adopt the new metrics so "we may be able to avoid triggering EIRs" which would be an "advantage to everybody".¹⁷

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Pasadena has utilized Street Segments as a CEQA measure since at least the 1994 General Plan. It is a well-established and generally accepted transportation performance metric. The City Council should not eliminate Street Segment CEQA analysis just because some developers contend that this places an undue burden on them. It is precisely for infill development that this measurement is of great value, since built-up areas may be most affected from increased traffic caused by new development. To contend that the underlying zoning is all that is needed, and that all impacts are acceptable and "built-in", is disingenuous at best.

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The City Council should include all future projects and all streets in Street Segment analysis. Multifamily and mixed-use development incorporating housing constitutes a very large percentage of recent and currently-proposed development projects. "Carving-out" multifamily residential from project-specific analysis would undercut the public's and policymaker's ability to measure and evaluate citywide traffic impacts during the CEQA process.

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¹⁵ June 11, 2014 Planning Commission meeting, MP4 Audio File, at 1:21:04 - 1:25:02, accessible at http://cityofpasadena.net/Media/Commission_Meetings/.

¹⁶ July 21, 2014 City Council meeting, Video File, at 2:01:05, accessible at http://cityofpasadena.net/Media/City_Council_Meetings/.

¹⁷ *Id.*

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SENATE BILL 743 DOES NOT DIRECTLY ADDRESS STREET SEGMENTS:

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743. Among other things, SB 743 creates a process to change analysis of transportation impacts under CEQA. SB 743 requires the Governor's Office of Planning and Research (OPR) to amend the State's CEQA Guidelines shifting the focus of transportation analysis to reduction of greenhouse gas emissions, creation of multimodal networks and promotion of a mix of land uses. On August 6, 2014, OPR released a Preliminary Discussion Draft of Updates to CEQA Guidelines Implementing SB 743 (hereinafter "Preliminary Guidelines").¹⁸ The Preliminary Guidelines are a "discussion draft" which OPR expects to "change for the better through public input."¹⁹ Public comments must be received by OPR before October 10, 2014.²⁰

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The Preliminary Guidelines focus mainly on the elimination of LOS as a CEQA metric; they do not directly address Street Segments.²¹ This comes as no surprise, since SB 743 itself does not reference Street Segments. Indeed, SB 743 specifically provides that cities like Pasadena can adopt CEQA guidelines that are more protective of the environment than OPR's guidelines.²² Therefore, SB 743 does not appear to limit Pasadena's discretion to maintain Street Segments as a CEQA metric.

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As expected, the Preliminary Guidelines have inspired a spirited debate. OPR officials have stated in response to public comments that it is always the lead agency that determines the level of significance in developing CEQA measures such as VMT.²³ This suggests that Pasadena has considerable discretion under CEQA to "customize" VMT and VT metrics to fit our community. For example, instead of measuring VMT and VT per capita across the entire City, DOT could measure a project's traffic impacts per capita over a smaller geographic area surrounding the project.

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¹⁸ DOT Staff Report dated September 10, 2014 , Attachment 1 (Preliminary Guidelines).

¹⁹ Preliminary Guidelines, p. 21.

²⁰ *Id.*

²¹ See generally DOT Staff Report dated September 10, 2014.

²² See Cal. Public Resources Code § 21099(e) ("This section does not affect the authority of a public agency to establish or adopt thresholds of significance that are more protective of the environment").

²³ See Martha Bridegam, *LOS to VMT: the Arguments Have Begun*, California Planning and Development Report (August 27, 2014) (quoting OPR Senior Counsel Christopher Calfee that "[u]nder CEQA it's always the lead agency that determines the level of significance", that lead agencies have "power to choose their own VMT models", and "[t]he proposed Guidelines expressly note lead agency's discretion in the choice of methodology, the use of professional judgment in adjust model inputs and outputs, and apply the rule of reason.").

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THE CITY COUNCIL SHOULD REVISE THE STREET SEGMENT IMPACT THRESHOLDS:

The Planning Commission heard many comments from the business community that the existing Street Segment impact thresholds are overly-sensitive.²⁴ I agree that the Street Segment impact thresholds should be revised. Currently, there is no minimum threshold for street ADT to establish impacts. Therefore, a few cars added to a street with low ADT shows as an impact. This can trigger EIRs even where just a few cars are projected to drive on low-volume streets such as, for example, an adjoining alley.

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The traffic growth on a Street Segment currently is calculated as follows: "Percentage of Traffic Growth on Street Segment = Net New Project Trips / Existing Daily Traffic".²⁵ Staff has proposed changing the methodology to a decreasing scale for the percent of project traffic on a street with a minimum Average Daily Traffic (ADT) threshold.²⁶ Under Staff's proposal, project approval conditions would be imposed on developments based on a "Percentage Net Increase of Project ADT over Existing ADT".²⁷ I generally concur with adopting a new threshold that calculates the percentage net increase of a project's projected ADT over existing street ADT. The project-related increase in ADT is utilized by other local jurisdictions and appears to be a reasonable alternative to the current approach. However, the proposed minimum impact number of 150 may be too low to properly account for traffic impacts in our community. I hope that Staff will consider alternatives to this figure.

CONCLUSION:

The City Council should adopt new mobility performance measures that reflect our smart growth needs and aspirations, as well as the current reality of auto traffic. Toward that end, the City Council should retain Street Segment analysis in Pasadena's Traffic Impact Guidelines for CEQA review of individual development projects. All development projects and all streets should be analyzed under this metric. I look forward to working with my Planning Commission colleagues and DOT to make this happen.

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Respectfully Submitted,

VINCE FARHAT

At-Large Commissioner
City of Pasadena Planning Commission

²⁴ For a discussion of the City's existing Street Segment traffic growth thresholds, please see DOT Staff Report dated June 11, 2014, p. 9.

²⁵ See DOT Staff Report dated July 23, 2014, p. 7.

²⁶ *Id.*

²⁷ *Id.* at p. 8.

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5. Errata to FEIR dated July, 2015

City of Pasadena Transportation Planning Memorandum

DATE: July 18, 2014

TO: Mayor & City Council
Planning Commission
Department of Transportation

FROM: Vince Farhat, Planning Commissioner

RE: NEW TRANSPORTATION PERFORMANCE MEASURES FOR TRANSPORTATION
IMPACT ANALYSIS AND THRESHOLDS FOR CEQA

INTRODUCTION:

The City of Pasadena Department of Transportation (DOT) wants to revise Pasadena’s traffic impact guidelines as part of the General Plan update. DOT is to be commended for recommending three new traffic metrics that embrace Pasadena’s vision of bike-friendly, pedestrian-friendly, and environmentally sustainable “smart growth”.¹ As Pasadena transitions to smart growth planning, however, the City Council should not ignore the reality that automobiles remain a primary mode of transportation for many Pasadena residents and visitors to our City. Therefore, the City should enact DOT’s three proposed new metrics in combination with more traditional vehicle traffic measures aimed at achieving better traffic flow on our streets.

In addition to adopting DOT’s three new smart growth metrics, the City Council should retain “Street Segment” analysis in Pasadena’s traffic impact guidelines for the review of future development projects. Street Segment analysis is an important tool in providing public notice of potential traffic impacts. Street Segment helps assess traffic volume growth impacts and potentially traffic safety issues.

DOT wants to move forward now with adopting new “vehicle miles traveled” and “vehicle trips” performance metrics as alternatives to more traditional “level of service” traffic measures. But the recent California state law that inspired this change (SB 743) is still being debated and the State is not expected to finalize the implementing guidelines until next year. The City should delay adoption of these proposed metrics until the State finalizes the new guidelines. This would give DOT time to develop additional implementation case studies, and afford the City the opportunity to conduct an independent analysis of the potential economic impacts of downtown traffic gridlock that could result from these proposals.

¹ The following three new performance metrics will better measure non-auto mobility impacts for future development: (1) Proximity and Quality of Bicycle Network; (2) Proximity and Quality of Transit Network; and (3) Pedestrian Accessibility.

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BACKGROUND:

On July 23, 2014, the City of Pasadena Planning Commission will review and comment on proposed new mobility performance measures for transportation impact analysis and thresholds for California Environmental Quality Act (CEQA) analysis (hereinafter "Proposed Mobility Measures"). The Proposed Mobility Measures are being considered as part of the ongoing update of the City of Pasadena General Plan.²

The City of Pasadena has a tradition of progressive transportation planning that encourages public transportation, promotes walking and biking, and protects residential neighborhoods from traffic, noise, and pollution. Our General Plan is "aspirational" in promoting long-term policies that encourage non-auto travel and "smart growth" principles. But the City's public transportation system is not yet at a point where the majority of Pasadena residents can easily get around town without a car. The automobile remains, for better or worse, a primary mode of transportation in Pasadena.

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In updating the General Plan, City Hall should adopt mobility performance measures that reflect both Pasadena's enthusiastic smart growth spirit and the reality of vehicle traffic. Traffic studies for the General Plan update and future real estate development projects should be accurate, robust, and reflect both our aspirational values and on-the-ground realities. Accordingly, DOT should adopt progressive, non-auto mobility performance metrics in combination with more traditional auto metrics that evaluate potential traffic impacts for future development. Only by employing a balanced and inclusive system can we adequately and responsibly address our City's layered needs.

RECOMMENDATIONS:

During Pasadena's transition to becoming a truly "green" community, City Hall should adopt new mobility performance measures that strike a careful balance between the use of environmentally-friendly smart growth metrics and traditional vehicle metrics geared toward

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² Staff originally informed the Planning Commission that DOT would present the Proposed Mobility Measures to the City Council after the Commission's July 23 meeting. However, yesterday the City posted a joint Planning Department / DOT staff report for the City Council's July 21, 2014 meeting. In that report, DOT recommends the City Council finalize and use the Proposed Mobility Measures at the July 21 meeting. The City Counsel should delay consideration of this issue until after the Planning Commission makes a recommendation at its July 23 meeting. If not, the City Council should direct DOT to use the existing transportation performance measures for the General Plan EIR.

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achieving acceptable traffic flow on our streets. In striking this balance, we should do the following:

- The City Council should adopt DOT's three new proposed performance metrics that measure non-auto transportation impacts. DOT should be applauded for their creativity in developing these forward-thinking smart growth mobility measures. 29 cont'd
- DOT should modify the proposed "per capita" Vehicle Miles Traveled (VMT) and Vehicle Trips (VT) performance metrics to make them more meaningful to the public and policymakers. Instead of measuring VMT and VT per capita across the entire City, for example, DOT could measure a project's traffic impacts per capita over a smaller geographic area surrounding the project. 30
- At a minimum, DOT should re-run their "case studies" using modified VMT and VT metrics before the City Council makes any final decision on the use of these measures. 31
- The City Council should retain Street Segment analysis for CEQA review of the General Plan and individual development projects. All development projects and all streets should be analyzed under this metric. 32
- While keeping Street Segments as a CEQA metric, DOT and the Planning Commission should undertake a review of current impact thresholds with the goal of proposing a selective modification to the Street Segment metric that addresses the concern that the current thresholds are overly-sensitive. 33
- DOT's proposal to affirmatively accept traffic "failure" as Pasadena's new traffic standard³ violates the General Plan's objectives and policies of promoting a livable and economically strong community, protecting neighborhoods, and managing multimodal corridors. 34
- We should re-commit ourselves to these General Plan principles by rejecting the idea that Pasadena should settle for traffic "failure" within TOD areas and the Central District.
- At a minimum, the City should conduct a rigorous and independent analysis of the potential economic impacts of "failure" traffic conditions before accepting the premise that "planning for gridlock" is an acceptable public policy. 35

³ See DOT Staff Report dated June 25, 2014, p. 6; see also DOT Staff Report dated June 11, 2014, p. 5 at Table 1 ("Up to and including LOS will be accepted inside designated HPA"); *Id.*, p. 7 (LOS F would not be a significant impact).

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- We should not use recent (and still evolving) changes in California CEQA law as an excuse to abandon realistic and balanced traffic planning. The potential impacts of SB 743 are far from clear, and the State is not expected to finalize new CEQA guidelines for at least another year. 36
- The City Council should delay implementation of VMT and VT metrics until the State finalizes the new CEQA guidelines. This would give City staff time to develop additional VMT/VT case studies, and to conduct an independent analysis of the potential economic impacts of Central District traffic gridlock. 37

PROPOSED NON-AUTO MOBILITY PERFORMANCE MEASURES:

On April 9, 2014, DOT first presented the Proposed Mobility Measures to the Planning Commission. As part of its proposal, DOT wants to add three new performance metrics to better measure non-auto transportation impacts: Proximity and Quality of Bicycle Network; Proximity and Quality of Transit Network; and Pedestrian Accessibility.⁴ 38

The City Council should immediately adopt these new non-auto performance metrics. These non-auto performance metrics are an important and necessary step forward in achieving our goal of making it easier for people to get around town without a car. However, current reality is such that we must deal not only with what we wish, but what is.

OTHER PROPOSED MOBILITY PERFORMANCE MEASURES:

In addition to the new non-auto performance metrics, DOT proposes to adopt “per capita” VMT and VT performance measures for new automobile trips within Pasadena’s citywide traffic model.⁵ DOT also wants to eliminate Pasadena’s existing “Street Segment” traffic analysis from CEQA consideration.⁶ Finally, DOT seeks to adopt a new City policy that vehicle Level of Service (LOS) ratings of “F” (failure) are acceptable within the City’s Transit Oriented Development (TOD) areas.⁷

DOT contends the proposed VMT, VT and diminished LOS performance measures, together with the elimination of Street Segment CEQA analysis, are consistent with the objectives and

⁴ See DOT Staff Report dated June 11, 2014, p. 5 (summary table) and pp. 7-9 (narrative description of Proposed Mobility Measures).

⁵ *Id.*, at p. 6

⁶ See DOT Staff Report dated June 25, 2014, p. 3 (summary table) and pp. 5-6.

⁷ *Id.* In addition to VMT, VT and LOS, DOT has proposed a Corridor Travel Time General Plan performance metric that would use the Dynamic Traffic Assignment (DTA) model to forecast auto travel times for significant arterial streets. See DOT Staff Report dated June 11, 2014, pp. 8-9.

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policies in the draft update to Pasadena's General Plan.⁸ As shown below, however, these proposals disregard important General Plan principles by "planning for gridlock" in the Central District and Playhouse District. Planning for downtown Pasadena traffic gridlock would be bad for business, the environment, and neighborhood quality of life.

A. The Proposed VMT and VT "Per Capita" Performance Measures are Illusory

The VMT Per Capita measure sums the miles traveled for trips within DOT's citywide traffic model. The Citywide VMT is then divided by the City's total service population (population plus the number of jobs) per capita.⁹ The VT Per Capita metric measures motor vehicle trips associated with the City by summing trips with origins and destinations within Pasadena as generated by the citywide traffic model.¹⁰ Therefore, VMT and VT would measure a real estate development project's potential traffic impacts on a per person basis across the entire City.

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Tellingly, none of the projects studied by DOT in their staff report "case studies" had significant traffic impacts under the VMT and VT Per Capita performance measures. This should come as no surprise given that a project's traffic impacts would be so diluted that this would be reflected as less than a mere "drop" in the citywide traffic "bucket". Indeed, DOT staff conceded at the June 11, 2014 Planning Commission meeting that it would be almost impossible for a single project to trigger the impact thresholds under citywide per capita parameters.

The proposed VMT and VT Per Capita metrics are illusory. They would result in virtually every future project getting a "free pass" from CEQA traffic analysis and mitigation. Future project environmental impact reports (EIRs) would effectively skip meaningful public traffic review since it would be virtually impossible for individual projects to trigger VMT and VT thresholds. The transportation "experts" would tell Pasadena residents time and again that large development projects do not create "significant" traffic impacts for adjacent residential and commercial neighborhoods. But it would strain common sense to say that large projects, even those adjacent to transit, have no significant traffic impacts.

To have any credibility, the proposed VMT and VT performance metrics should be modified to make them more meaningful to the public and policymakers. Instead of measuring VMT and VT per capita across the entire City, DOT should measure a project's traffic impacts per capita over a smaller geographic area surrounding the project. One approach would be to measure the per capita traffic impacts within a quarter- or half-mile radius of the proposed project. At a

⁸ DOT Staff Report dated June 25, 2014, p. 1-2 (new performance measures developed to "better align" how DOT determines transportation impacts with the proposed General Plan Land Use and Mobility Element objectives and policies).

⁹ DOT Staff Report dated June 11, 2014, p 6.

¹⁰ *Id.*

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minimum, before the Planning Commission makes a recommendation, DOT should r
three case studies using such modified VMT and VT metrics.

B. Street Segments Should Be Retained in CEQA Analysis

DOT has traditionally focused on promoting smart growth and enhancing neighborhood quality of life. Toward that end, the General Plan Mobility Element built upon the foundation of the 1994 General Plan in adopting important neighborhood protection principles for transportation planning. These principles include “de-emphasized” streets¹¹, Neighborhood Traffic Management Programs (NTMP),¹² and “Street Segment” traffic analysis for CEQA review of proposed development projects.¹³

The Street Segment metric studies the amount of new auto trips a development project will add to adjacent streets.¹⁴ It is a sensitive traffic performance metric with a low impact threshold that identifies changes to vehicle volumes on all streets, including residential streets.¹⁵

DOT originally sought to eliminate Street Segment analysis altogether.¹⁶ On June 25, 2014, in response to comments from Planning Commissioners, DOT revised its position and proposed that a modified type of Street Segment analysis be utilized in connection with project-specific neighborhood protection programs.¹⁷ However, DOT wants to exclude Street Segments from CEQA analysis for both the General Plan update and future development projects.¹⁸ In addition, DOT proposes to exempt multifamily residential projects from Street Segment analysis and wants to limit such analysis to only “access” and “neighborhood connector” streets.¹⁹

DOT acknowledges that the current Street Segment metric identifies changes to vehicle volumes on all streets, but contends that the metric is not consistent with the land use

¹¹ See 2004 General Plan Mobility Element § 4.1.3.1

¹² *Id.* § 3.2.3

¹³ See DOT Staff Report dated June 11, 2014, p. 9.

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ See DOT Staff Report dated April 9, 2014, pp. 2-4 (describing new performance measures without any reference to Street Segments); DOT Staff Report dated June 11, 2014, pp. 9-10 (describing purported disadvantages of Street Segment analysis).

¹⁷ See DOT Staff Report dated June 25, 2014, p. 5 & Attachment 4.

¹⁸ *Id.*

¹⁹ June 25 Report, Attachment 4. DOT also seeks to revise the impact threshold that would require neighborhood traffic calming measures. As discussed below, I agree the current impact threshold should be revised, but would defer that topic to upcoming Planning Commission meetings.

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densities identified in the General Plan, that auto trips associated with some reside projects are not *per se* cut-through traffic, and that sometimes Street Segment traffic impacts cannot be mitigated.²⁰ During public comment at a recent Planning Commission meeting, a local architect argued for the elimination of Street Segment analysis because the metric sometimes triggers EIRs for otherwise compliant development projects and such EIRs are an “unreasonable burden” for infill development.²¹ But it is precisely for infill development that this measurement is of great value, since built-up areas may be most affected from an increased traffic burden.

Experience has taught us that Street Segment analysis is an important tool in the CEQA process to give public notice of potential traffic impacts. Street Segment analysis has been appropriately applied to both large projects such as Westgate and smaller, neighborhood-oriented projects such as Desiderio. It is not an “unreasonable burden” to require Street Segment traffic analysis for important projects of citywide significance in a community such as Pasadena that is committed to sustainable development and neighborhood protection. Street Segment analysis is an important tool in assessing traffic volume growth impacts, and potentially also a valuable tool to ensure traffic safety. Bikers and walkers can look to Street Segment traffic impacts to help understand a project’s potential impacts on their activities.

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DOT’s argument that some Street Segment impacts cannot be mitigated is a red-herring. Numerous development projects have been approved by the City Council through Statements of Overriding Consideration as permitted by CEQA. If the Council determines that the benefits of a project outweigh the traffic impacts, the Council can certify the final EIR and the project will go forward. Without Street Segment analysis, however, the public and policymakers will lose a critical insight into the potential and collateral traffic impacts of future development.

The City should not limit Street Segment analysis to only two types of streets; potential traffic impacts on all streets, including commercial corridors, should be evaluated. Nor should DOT exclude multifamily residential projects from Street Segment analysis. Multifamily and mixed-use development incorporating housing constitutes a very large percentage of recent and currently-proposed development projects. “Carving-out” multifamily residential from General Plan and project-specific analysis would undercut the public’s and policymaker’s ability to measure and evaluate citywide traffic impacts during the CEQA process.

The City should retain Street Segment analysis in Pasadena’s Traffic Impact Guidelines for CEQA review of the General Plan and individual development projects. All development projects and all streets should be analyzed under this metric. However, DOT and the Planning Commission should undertake a review of current impact thresholds with the goal of proposing a selective

²⁰ See DOT Staff Report dated June 25, 2014, p. 10 & Attachment 1.

²¹ June 11, 2014 Planning Commission meeting, MP4 Audio File, at 1:21:04 - 1:25:02, accessible at http://cityofpasadena.net/Media/Commission_Meetings/.

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modification to the Street Segment metric that addresses the legitimate concerns expressed by staff and the business community that the current thresholds are overly-sensitive.

C. Planning for Traffic Failure and Gridlock is Bad Public Policy

DOT seeks to modify the current vehicle LOS performance metric to incorporate the definitions contained in the Transportation Research Board's *Highway Capacity Manual (HCM) 2010* and to eliminate LOS thresholds for the City's TOD areas.²² In addition, DOT wants to adopt a new City policy that vehicle LOS ratings of "F" (failure) are acceptable within TOD areas.²³ Together with eliminating Street Segment CEQA analysis and the illusory VMT/VT Per Capita metrics, all meaningful impacts are effectively diluted and rendered insignificant. DOT's embrace of "failure" traffic conditions amounts to an endorsement of traffic "gridlock" in downtown Pasadena. With these proposed policies, DOT is literally "planning for gridlock".

Although some limits to LOS will be necessary to comply with recent changes in state law²⁴, planning for downtown traffic gridlock would be indefensible public policy. Endorsing "failure" traffic conditions would be bad for Pasadena business, and detrimental to the environment and neighborhood quality of life.

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1. Endorsing "Failure" Would be Bad for Pasadena Business

Extreme traffic gridlock would be bad for business. One does not need to be a traffic engineer to know that gridlocked traffic conditions would deter some Pasadena residents living outside the Central District from coming downtown to shop and eat. Gridlocked traffic also would discourage out of town customers from patronizing businesses located in the Central District. Notably, DOT has done no analysis of the potential negative economic impacts of gridlocked traffic conditions in the Central District.

Some publically-available research studies have concluded that increased traffic congestion can have negative economic impacts. For example, a study by economist Kent Hymel appeared in

²² See DOT Staff Reports dated June 11 and June 25, 2014. I have no objection to adopting the HCM 2010 LOS definitions.

²³ June 25, 2014 Staff Report, p. 6; see also DOT Staff Report dated June 11, 2014, p. 5 at Table 1 ("Up to and including LOS will be accepted inside designated HPA"); *Id.*, p. 7 (LOS F would not be a significant impact).

²⁴ On September 27, 2013, Governor Brown signed Senate Bill (SB) 743. Among other things, SB 743 creates a process to change analysis of transportation impacts under CEQA. SB 743 requires the Governor's Office of Planning and Research (OPR) to amend the State's CEQA Guidelines shifting the focus of transportation analysis away from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks and promotion of a mix of land uses. See DOT Staff Report dated April 9, 2014, pp. 4-5 & Attachment 1.

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the *Journal of Urban Economics* which linked traffic congestion to slower employment growth.²⁵ Hymel examined traffic congestion and employment growth in 85 metropolitan areas between 1990 and 2003 and found evidence of rising regional traffic congestion depressing employment growth. According to Hymel, a 50 percent reduction in congestion could boost employment by 10 to 30 percent in America's top 10 most congested cities. For Los Angeles, the most congested city in the U.S. in several measures according to the Texas Transportation Institute, a 10 percent increase in regional congestion reduced employment growth by 4 percent, according to Hymel's estimates. Hymel writes, "congestion has a broad negative impact on economic growth."²⁶

Admittedly, traffic congestion's localized impacts may not be as negative for certain types of neighborhoods. The actual economic impacts of traffic congestion can differ by metropolitan area, depending on its economic profile and business location pattern.²⁷ One of the keys is analyzing the difference between regional "through traffic" and localized congestion in a specific community. On the block level, congestion may be a sign of economic success, but the congestion itself still inhibits mobility and circulation; congestion still has a negative impact.²⁸ In light of the complexity of these issues, the City Council should insist that the Planning Department conduct a **rigorous and independent economic analysis** of the potential impacts of Central District traffic conditions before accepting the premise that "planning for gridlock" is an acceptable public policy.

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With respect to the debate over recent changes in CEQA law, we should not use SB 743 as an excuse to abandon realistic and balanced traffic planning. First, SB 743 was intended primarily to benefit moneyed special interests, not local businesses and residents.²⁹ Second, local cities

²⁵ See Staley, *Traffic Congestion and the Economic Decline of Cities*, Reason Foundation (2012) (discussing Hymel's research).

²⁶ *Id.*

²⁷ Weisbrod, Vary & Treyz, *Measuring the Economic Costs of Urban Traffic Congestion to Business*, Transportation Research Board Annual Meeting (2003) at p. 11.

²⁸ See Samuel R. Staley, Ph.D., *Traffic Congestion and the Economic Decline of Cities: How Traffic is Costing People Jobs and Stifling Economic Growth*, Reason Foundation (January 2012).

²⁹ SB 743 was the "brainchild" of California State Senator Darrell Steinberg (D-Sacramento). Senator Steinberg's primary objective was to deliver on a promise to NBA Commissioner David Stern to streamline approval of the Sacramento Kings arena project. See <http://www.highbeam.com/doc/1G1-344041341.html>. "[W]hile many will be disappointed that SB 743 does not completely overhaul CEQA, certain project proponents will benefit tremendously from the new rules." *Id.* Notably, not a single environmental group backed AB 743. During the Legislature's consideration of AB 743, "the leader of one environmental group wrote in a personal email, 'By cherry-picking one provision, LOS, underserved communities are again getting the short end of the stick in order for wealthy NBA owners to have an easier time

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such as Pasadena still retain considerable discretion under SB 743 to set parameters for CEQA metrics.³⁰ Third, many of the criticisms of LOS underlying the changes in SB 743 simply do not apply to Pasadena. For example, critics of LOS contend it promotes auto-centric planning policies such as street widening, but our City has a firm policy **against** street widening. Critics of LOS also often assume the availability robust non-auto transit modes, but our City's public transportation system is not yet at a point where most residents can easily get around town without a car. Therefore, Commissioners and City Councilmembers should reject the argument that SB 743 compels us to "plan for gridlock".

In any event, the potential impacts of SB 743 are far from clear, and the State is not expected to finalize new CEQA guidelines for at least another year. If Commissioners and City staff cannot reach consensus quickly, the City Council should delay implementation of VMT and VT metrics until the State finalizes the new CEQA guidelines. This would give City staff the time to develop additional VMT/VT case studies, and to conduct an economic analysis of the potential impacts of Central District traffic gridlock.

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2. Endorsing "Failure" Would be Detrimental to the Environment and Neighborhood Quality of Life

Traffic gridlock is bad for the environment. It is undisputed that trucks and automobiles emit more pollution when they are idling in stopped traffic. Gridlocked traffic conditions would therefore add to pollution and increase greenhouse gases.³¹ It is documented that five minutes of idling per day/per vehicle emits 220 lbs. of carbon dioxide per year.³² Are we ready to add to our environmental particulate and toxic gas burden by increasing idling autos on our streets that will emit additional pollution into our air? Will this not also be detrimental to pedestrians and bicycle riders as well?

building a stadium." <http://www.santamonicanext.org/ceqa-reform-passes-senate-for-los-basketball-team/>.

³⁰ See The Atlantic Citylab ("There will be room for technical derivatives—say, VMT per capita for a residential building, or VMT per employee for an office—and ultimately local governments set the precise parameters for CEQA metrics. In other words, cities themselves decide how many vehicle miles constitute a project failure. But if the current direction holds, a new CEQA metric with VMT at its core will be adopted sometime in 2015."), <http://www.citylab.com/commute/2014/07/transit-projects-are-about-to-get-much-much-easier-in-california/374049/>.

³¹ *Attention drivers! Turn off your idling engines: Reducing vehicle idling will cut pollution and save you money*, <http://www.edf.org/transportation/reports/idling>.

³² See *Idling Vehicle Emissions for Passenger Cars, Light-Duty Trucks, and Heavy-Duty Trucks*, U.S. Environmental Protection Agency Office of Transportation and Air Quality, EPA420-F-08-025 (October 2008).

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Traffic gridlock is bad for neighborhood quality of life. Vehicle traffic is like water; it follows the path of least resistance. Gridlocked traffic conditions in the Central District and Playhouse District would have negative “spillover” impacts as drivers cut-through adjacent residential neighborhoods in order to avoid clogged downtown streets. Protecting residential neighborhoods from spillover traffic intrusion is a core principle of our General Plan.³³

Not only is planning for gridlock bad public policy, it flouts well-documented community concerns about traffic and overdevelopment. During the General Plan Update outreach process, City staff heard from approximately 3,000 residents from across Pasadena. Staff notes reflect that “one of the greatest concerns for the community is centered around growth and density of future development and the potential impacts it could have on existing community character.”³⁴ Indeed, the largest contingent of residents who participated in the General Plan outreach process were very critical of recent trends in Pasadena traffic and development:

The largest number of comments, nearly half of those recorded, stated that the City was too dense already and was suffering from negative impacts such as traffic congestion, loss of open space and views, loss of small-town character and problems with air quality and noise. Participants frequently used the term “over developed” and often said they thought there were too many condominium and apartment buildings. Some went so far as to say there should be a moratorium on new development.³⁵

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³³ See 2004 General Plan Mobility Element §3.2.3 (recognizing the need to address traffic safety within residential neighborhoods, the City Council “approved measures to protect neighborhoods from traffic intrusion. A significant concern of residents regarding local neighborhood streets is the volume of traffic, the speed of traffic, noise impacts and on-street parking impacts, and impacts of truck traffic of large construction projects.”); see also Mobility Element Policy 3.1 (“Make the most efficient use of major corridors and discourage auto and truck traffic from using local streets to bypass congested inter-sections. Review new development along multimodal corridors to eliminate or minimize the intrusion of traffic from these projects.”); Mobility Element Policy 3.11 (“Recognize designated de-emphasized streets as routes where efforts will be made to limit increases in travel. Measures that would increase traffic in these streets will not be planned or implemented.”); General Plan Policy 3.12 (“Cooperatively develop and implement pro-grams developed for designated de-emphasized streets to control future increases in traffic volumes.”).

³⁴ General Plan Update Outreach Summary Report, Part II: Most Frequently Heard Themes (May 2010).

³⁵ *Id.* Admittedly, there were a range of comments on these issues and the views of some Central District residents may have been underrepresented during the outreach process. Nevertheless, it is beyond dispute that the largest number of comments stated that Pasadena was suffering from negative impacts such as traffic congestion.

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I support balanced and thoughtful development, and do not believe that a moratorium on new development would be appropriate. However, documented community concerns about traffic and overdevelopment should be consequential factors in developing mobility performance metrics for future development. Residents' concerns about traffic are part of the community context for the General Plan update. "Planning for gridlock" would patently discount those who took the time during the outreach process to voice strong concerns about traffic and overdevelopment in the Central District.

The proposal to accept traffic "failure" violates the General Plan's objectives and policies of promoting a livable and economically strong community, protecting neighborhoods, and managing multimodal corridors.³⁶ We should re-commit ourselves to these principles by rejecting the idea that Pasadena should settle for "failure" within TOD areas.

CONCLUSION:

The City should adopt forward-looking non-auto mobility performance metrics in combination with more traditional auto metrics that evaluate potential traffic impacts for future development. Moreover, City Hall should reject the false premise that rigorous traffic studies are an impediment to economic growth and development. Robust economic growth and neighborhood quality of life go together to make Pasadena a great place to live, work and play. Toward these ends, we should adopt new mobility performance measures that reflect our smart growth needs and aspirations, and the current reality of auto traffic. I look forward to working with my Planning Commission colleagues and DOT to make this happen.

Respectfully Submitted,

VINCE FARHAT

At-Large Commissioner
City of Pasadena Planning Commission

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³⁶ See 2004 General Plan Mobility Element § 3.2 (Objectives & Policies).

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Response to Comments from Vince Farhat, dated March 15, 2015.

1. The commenter states that the Planning Commission did not endorse DOT's new transportation performance metrics that were adopted by City Council on November 3, 2014. The DEIR analyzes transportation and traffic impacts based on the City's adopted thresholds of significance. The transportation analysis in the DEIR does not understate impacts. However, the DEIR analysis does use a different metric than an auto delay based metric to determine transportation impacts. Staff has reviewed the transcripts of the Planning Commission hearings regarding the thresholds. Staff could not find any written or verbal confirmation of DOT or Planning staff committing to analyzing the General Plan EIR using both LOS and the then proposed transportation performance measures and CEQA thresholds.
2. The Pasadena General Plan DEIR considers citywide street segments and circulation in order to evaluate transportation impacts based on to the City's adopted transportation thresholds of significance. On November 3, 2014, the City Council adopted transportation metrics that contained a requirement for street segment analyses outside of the CEQA process for all projects of "Communitywide Significance." The street segment metric (outside of the CEQA process) may also apply to smaller projects at the discretion of the Director of Transportation. However, the DEIR does not use a street segment performance measure to analyze transportation impacts. Refer to Responses to Comments 11 through 27 for responses to comments provided on the September 9, 2014 Memorandum.
3. Refer to FEIR Section 2.1, Transportation Metrics for an explanation of why a comparison of the old and new metrics would not provide meaningful information. Analysis of traffic impacts based on street segment performance criteria would require additional modeling and separate, independent analysis. However, the DEIR did not evaluate traffic impacts based on a street segment performance metric, nor is this analysis required under CEQA.
4. Yes, DEIR Section 5.13.3 explains the methodology for analyzing the transportation and traffic impacts. In addition, FEIR Section 2.1, Transportation Metrics explains why the EIR did not analyze impacts based on the City's old metrics.
5. The EIR does explain its transportation methodology as stated in Response to Comment 4 above. However, refer to Responses to Comments 28 through 38 for responses to comments provided in the July 18, 2014 Memorandum.
6. Analysis of transportation impacts under the old metrics was not prepared. Refer to FEIR Section 2.1, Transportation Metrics.
7. Refer to FEIR, Section 2.1, Transportation Metrics. If the DEIR used the City's old metrics to analyze transportation impacts, it would require additional modeling and

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analysis, independent of what was analyzed. This analysis would be in addition to and cannot be compared with what was provided in the DEIR because it is a measurement of different performance criteria and policies. Impacts based on the new metrics are not “greater” or “less than” impacts based on the old metrics, because they are different methods of measuring impacts altogether.

8. Since there will not be an analysis using the former thresholds, there are no changes to the analysis and the impact conclusions, and therefore no change will have to be made to the Statement of Overriding Considerations.
9. As stated previously, the EIR used the City’s adopted thresholds for measuring transportation impacts. Since an analysis of the old metrics was not included it cannot be stated which alternative would be considered the environmentally superior alternative under that scenario.
10. Comment noted.
11. This September 9, 2014 Memorandum provides the commenter’s opinion on street segment, VMT per capita and VT per capita traffic metrics that were submitted prior to the November 3, 2014 adoption of the new traffic metrics. The commenter states that street segment metrics should be used to measure traffic impacts under CEQA and that VMT and VT per capita do not adequately analyze impacts of auto traffic. These were comments that were provided to the City Council during the consideration and processing of new transportation metrics and do not relate to the sufficiency of the EIR.

As stated in FEIR Section 2.1, Transportation Metrics, the City conducted extensive public review and considered substantial evidence to adopt new traffic thresholds of significance to apply to all CEQA documents pursuant to CEQA Guidelines Section 15064.7(b). As described, 16 public meetings were held on the transportation thresholds of significance prior to City Council adoption in November 2014. Based on the evidence provided to City Council, it determined that the new transportation performance measures and CEQA thresholds are better aligned with the City’s General Plan goals and policies and State regulations to create more sustainable transportation systems. They are also better suited to Pasadena’s existing urban, walkable environment, since traditional performance measures (e.g. LOS) often require mitigation that increases roadway width that often cannot be constructed without adversely affecting existing buildings and the pedestrian environment. The performance measures and CEQA thresholds provide a holistic approach by considering the City’s transportation network, including all modes of travel. The City Council found that this approach provides a more comprehensive systems approach that is independent and distinct from traditional traffic thresholds measuring level of service (see Staff Report and Minutes from the

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November 3, 2015 City Council Hearing on New Transportation Performance Measures for Transportation Impact Analysis and Thresholds of Significance for CEQA.

12. The commenter provides background regarding the City's past practices when performing street segment analysis. This comment was provided to the City Council during their consideration of new transportation metrics. On November 3, 2014, the City Council adopted new transportation metrics in accordance with staff's recommendations. The adopted transportation metrics include a requirement for street segment analyses outside of the CEQA process for all projects of "Communitywide Significance" (i.e., more than 50 residential units and/or more than 50,000 square feet of non-residential space). The street segment metric (outside of the CEQA process) may also apply to smaller projects (i.e., 11-49 residential units and/or 10,001-49,999 square feet of non-residential space) at the discretion of the Director of Transportation. Consistent with the commenter's assertion, the City's new Transportation Impact Analysis Guidelines limits street segment analysis to projects on "Access" and "Neighborhood Connector" street types within a residential context.
13. Refer to Response to Comment 11. The City adopted new traffic thresholds of significance, eliminating CEQA review of traffic impacts based on street segment metrics.
14. The commenter provides opinions regarding the value of street segment analysis, which are duly noted.
15. The commenter provides opinions regarding the value of street segment analysis, which are duly noted. The commenter correctly characterizes the process by which the City can approve a project with a significant, unavoidable environmental impact vis-à-vis a Statement of Overriding Considerations. The City's adopted transportation metrics and Transportation Impact Analysis Guidelines provide for transportation metrics to evaluate a project's potential impacts on auto, transit, bicycle, and pedestrian modes of transportation.
16. The commenter provides opinions regarding the effectiveness of the per capita Vehicle Miles Traveled (VMT) and Vehicle Trips (VT) performance metrics, which are duly noted. The City's adopted VMT and VT metrics were developed to evaluate projects according to the three main objectives of the Mobility Element—enhance livability; encourage walking, biking, transit and other alternatives to motor vehicles; and create a supportive climate for economic viability.

VMT is a measure of the total distance traveled by automobile, reflecting both the number of auto trips and the length of each auto trip made. Trip length is dependent on a number of factors that are included in the travel demand model, including but not limited to proximity of homes to job generating land uses, proximity to transit centers, socio-economic characteristics, and provision of multimodal transportation

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infrastructure. The proposed General Plan land use diagram and mobility element were developed to allow growth while reducing trip length and overall VMT.

The travel demand model was used to assess the interaction between land uses and the resulting automobile trips. The results of VMT Per Capita and VT Per Capita analysis, presented in the transportation section of the DEIR, were computed using the City of Pasadena's Citywide Travel Demand Model with different land use inputs for each scenario. This model has been calibrated and validated to Caltrans Travel Forecasting Guidelines and exceeded all of the validation standards, resulting in a locally valid model for Pasadena. Travel demand model documentation for the Pasadena model was included in the DEIR Appendix I.

17. The commenter provides opinions regarding the effectiveness of the per capita Vehicle Miles Traveled (VMT) and Vehicle Trips (VT) performance metrics, which are duly noted.
18. The commenter provides opinions regarding the value of street segment analysis, which are duly noted. See also response to Comment 12, which describes when street segment analysis is required under the City's new Transportation Impact Analysis Guidelines outside of CEQA.
19. The commenter expresses recommendations and an interpretation of how to apply street segment analysis on a citywide basis. To clarify, the adopted transportation metrics include a requirement for street segment analyses outside of the CEQA process for all projects of "Communitywide Significance" (i.e., more than 50 residential units and/or more than 50,000 square feet of non-residential space). The street segment metric (outside of the CEQA process) may also apply to smaller projects (i.e., 11-49 residential units and/or 10,001-49,999 square feet of non-residential space) at the discretion of the Director of Transportation.
20. The City's adopted VMT and VT metrics were developed to evaluate projects according to the three main objectives of the Mobility Element—enhance livability; encourage walking, biking, transit and other alternatives to motor vehicles; and create a supportive climate for economic viability.
21. The commenter provides background regarding the City's past practices and opinions regarding the value of street segment analysis, which are duly noted.
22. The commenter makes recommendations on how to apply street segment analysis on a citywide basis. To clarify, the adopted transportation metrics include a requirement for street segment analyses outside of the CEQA process for all projects of "Communitywide Significance" (i.e., more than 50 residential units and/or more than 50,000 square feet of non-residential space). The street segment metric (outside of the CEQA process) may also apply to smaller projects (i.e., 11-49 residential units and/or

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- 10,001-49,999 square feet of non-residential space) at the discretion of the Director of Transportation.
23. The commenter is correct regarding the background of SB 743 and the timing of preliminary guidelines distributed by OPR. No further response is required.
 24. Refer to FEIR Section 2.1, Transportation Metrics. The commenter provides an accurate representation of SB 743 as it relates to street segment analysis. On November 3, 2014, the City Council adopted new transportation metrics that included street segment analysis for certain projects outside of the CEQA process. See also response to comment 12.
 25. Comment noted.
 26. The commenter is recommending altering the thresholds for Street Segment analysis to be included as part of CEQA in order for it to be a more effective tool in achieving neighborhood compatibility.
 27. The commenter is recommending maintaining Street Segment analysis as part of CEQA review of individual development projects. On November 3, 2014, the City Council adopted transportation metrics that contained a requirement for street segment analyses outside of the CEQA process for all projects of “Communitywide Significance.” The street segment metric (outside of the CEQA process) may also apply to smaller projects at the discretion of the Director of Transportation.
 28. This comment provides the introduction and background of the new transportation performance measures for consideration and relevant on July 18, 2014. No response is necessary.
 29. On November 3rd, 2014, City Council adopted three new proposed performance metrics that measure non-auto transportation impacts.
 30. On November 3rd, 2014, City Council adopted VMT and VT per capita across the entire City. The commenter states that it should have been limited to smaller geographical areas, which is duly noted.
 31. This comment relates to the development of transportation metrics that were adopted by the City Council on November 3rd, 2014. Those adopted metrics maintained VMT and VT metrics on a per capita, citywide basis.
 32. On November 3rd, 2014, City Council adopted transportation metrics that did not include Street Segment metrics analysis as part of CEQA.

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33. DOT developed Transportation Impact Analysis Current Practice and Guidelines that included modified average daily traffic caps to conduct non-CEQA related Street Segment analysis.
34. The adopted non-CEQA thresholds for Level of Service, as set forth within the Transportation Impact Analysis Current Practice and Guidelines, sets LOS caps for Transit Oriented Districts and Citywide at LOS E and D, respectively. Where those LOS caps are exceeded conditions of approval would be recommended.
35. See response to Comment 34. The General Plan Update contains a number of policies and a land use mix designed to foster economic vitality. Economic analysis is not a CEQA related issue.
36. The City adopted new traffic metrics as allowed and encouraged by CEQA. However, this comment is noted and was considered by City Council during review and adoption of the new metrics.
37. This comment is hereby noted.
38. This comment and remainder of the memorandum discusses reasons for maintaining street segment metrics; supporting instead the non-auto mobility performance metrics in combination with more traditional auto metrics. This memorandum was considered by City Council prior to the adoption of the new transportation performance measures on November 3, 2014. This does not relate to the sufficiency of the Pasadena General Plan EIR and no further response is necessary.

5. Errata to FEIR dated July, 2015

Nicole Morse

Subject: General Plan Update - Draft EIR Comments

From: Robert Tait [<mailto:rtait@me.com>]
Sent: Wednesday, February 25, 2015 9:10 AM
To: Chima, Vicrim
Cc: Bob Kneisel
Subject: General Plan Update - Draft EIR Comments

Mr. Chima:

After reading the Draft Environmental Impact Report for the General Plan Update, the board of Directors for the El Rio/Lake Neighborhood Association does not believe that certain aspects of the Land Use Element were adequately considered.

R11-1

Chapter 17.43 (Density Bonus, Waivers and Incentives) of the City of Pasadena Zoning Code was put in place in 2006, after the present version of the General Plan was established. This Chapter has the potential to create environmental impacts to low density residential zones that are adjacent to mixed use zones in particular. By increasing density and waiving development standards, those locations where low density residential zones (Single family residences particularly) are adjacent to mixed use zones will see numerous impacts, including but not limited to:

Aesthetics
Air Quality
Noise
Traffic
Parking
etc.

R11-2

We are particularly concerned about the "Waivers" aspect of Chapter 17.43 of the City Zoning Code and its impacts on adjacent low density residential zones. For example, the Mixed Use zoned areas radiating out from the Intersection of Lake Avenue and Washington Boulevard are directly adjacent to three landmark districts (Bungalow Heaven, Washington Square, and Historic Highlands) plus a residential neighborhood association (El Rio/Lake). With Chapter 17.43 allowing the waiver of "appropriate transitions" from developments using the available waiver conditions, significant impacts are likely for adjacent, single family properties.

R11-3

These effects and impacts have not previously been evaluated and should be considered in the EIR. In addition, the mitigating alternative of changing the Mixed Use zoning in such locations to Low Density Commercial zoning should be considered.

There are a number of locations where such impacts could occur in Pasadena, and most of them (from east to west) are listed below:

West side of Rosemead from San Pasqual to Colorado,

South side of E. Colorado from Rosemead to Kinneloa,

North side of Washington from Catalina to Mentor and from Prime Court to Palm Terrace,

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North Lake (both sides) from Mountain to Claremont and from Rio Grande to Elizabeth,
West side of Fair Oaks from W. State to Bellefontaine,
Between S. Grand and S. Arroyo Blvd, South of CA 134,
West side of Lincoln between Pepper and Howard.

R11-3
cont'd

Robert J Tait, Ph.D.
President, El Rio/Lake Neighborhood Association rjtait@me.com

5. Errata to FEIR dated July, 2015

Response to Comments from Robert Tait, dated February 25, 2015.

- R11-1 The commenter states that the Board of Directors for the El Rio/Lake Neighborhood Association does not believe that certain aspects of the proposed Land Use Element were adequately analyzed in the Pasadena General Plan DEIR. Responses to each of the comments are provided below.
- R11-2 The commenter states that mixed use zones adjacent to low density residential would result in environmental impacts (related to aesthetics, air quality, noise, traffic, and parking) due to Chapter 17.43 of the City's Zoning Code. Refer to FEIR Section 2.2, State Density Bonus Law. Note that the EIR assumed a reasonable level of density bonus development, based on the City's experience since the implementation of the state density bonus law, and the EIR analyzed the potential environmental effects of this reasonable and fact-based increase in density. As discussed, the EIR addresses impacts related to aesthetics and cultural resources. Impacts related to light, air quality, noise, and traffic are analyzed in the DEIR in Sections 5.1, 5.2, 5.9, and 5.13, respectively. The commenter expresses concern for impacts related to air quality, noise and traffic impacts of the General Plan Update. Both construction and operational impacts related to air quality, noise, and traffic of General Plan Update buildout were analyzed and mitigation measures were included. There are no new impacts anticipated. CEQA does not require the analysis of impacts related to parking.
- R11-3 The commenter cites a number of locations in the city where mixed use zoning is allowed or would be proposed adjacent to residential neighborhoods and landmark districts. The commenter is concerned that these areas would utilize density bonus waivers resulting in impacts that were not addressed. However, the commenter does not state specifically what impacts were not addressed in the DEIR. As stated in Response to Comment R11-2 and FEIR Section 2.2, State Density Bonus Law, the DEIR did analyze impacts related to allowing mixed uses adjacent to historic districts and SB 1818. Furthermore, as discussed in Section 5.1-1 of the DEIR, the City implements a robust set of procedures, regulations, and guidelines related to development review of new projects in Pasadena, most of which require consistency with the General Plan. For example, the City evaluates the design of proposed projects for their consistency with its Citywide Design Principles and Design Guidelines, Design Guidelines for Neighborhood Commercial and Multifamily Districts, and the North Lake Specific Plan. These guidelines, as well as the City Municipal Code, address context-sensitive design and land use compatibility.

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6. Refined Project Environmental Analysis

This Section documents the environmental analysis of a refined version of the proposed project, the “Refined Project,” and demonstrates that, for all environmental topic areas, impacts of this Refined Project would be similar or lesser than those of the proposed project.

6.1 REFINED PROJECT

Upon review of the DEIR, the Pasadena Planning Commission, in concurrence with staff’s recommendation, targeted refinements to the proposed project to better reflect multiple interests and community concerns. This decision was based, in part, on feedback that the proposed project allowed too much development potential and the environmentally preferable CD, SFO, LA Alternative would not permit enough growth in areas where additional development capacity is necessary to meet community needs. After considering these competing interests, the Planning Commission and City staff recommended adoption of a hybrid of the CD, SFO, LA Alternative and the proposed project development capacities. It also recommended minor changes to the policies of the Land Use Element and minor changes to the Land Use Diagram based on comments received during the public process. These changes are described here as the Refined Project.

As part of the General Plan Update process, the Pasadena City Council directed staff to analyze four project alternatives in the Draft Environmental Impact Report (DEIR). The Section 7 of the DEIR analyzed these alternatives, their potential environmental impacts, and their ability to achieve project objectives established for the proposed project. The alternatives included the following:

- No Project Alternative (buildout of the adopted General Plan)
- Central District, South Fair Oaks, Lincoln Avenue Alternative (CD, SFO, LA Alternative)
- Efficient Transportation Alternative
- Reduced Air Quality and Noise Impact Alternative

Since the Refined Project has development caps between the proposed project and the CD, SFO, LA Alternative, the environmental impacts of the Refined Project are generally less than those the DEIR identified for the proposed project and greater than those the DEIR identified for the CD, SFO, LA Alternative. The DEIR determined that the proposed project would result in significant and unavoidable impacts on air quality, GHG emissions, noise, and traffic. The DEIR further determined that the CD, SFO, LA Alternative would reduce the proposed project’s significant impacts, but would not reduce any of those significant impacts to a less than significant level. Likewise, the Refined Project would result in the same significant and unavoidable impacts on air quality, GHG emissions, noise, and traffic, with those impacts being incrementally less than the proposed project but greater than the CD, SFO, LA Alternative. See the “Environmental Analysis of the Refined Project” section of this Memorandum for a detailed analysis of the environmental impacts of the Refined Project.

6. Refined Project Environmental Analysis

6.1.1 Description of Refined Project

The Refined Project includes refinements to the Development Caps, Land Use Diagram, and Policies of the proposed project as described in the following subsections.

Development Caps

The Refined Project represents a hybrid of the development caps in the proposed project and CD, SFO, LA Alternative. The Refined Project utilizes the same residential development caps for the North Lake Specific Plan, Fair Oaks/Orange Grove Specific Plan, and Lincoln Avenue Specific Plan areas as compared to the proposed project. It utilizes the same residential development caps for East Pasadena and Lamanda Park as the CD, SFO, LA Lamanda Park Sub-Alternative. Finally, it sets different development caps for residential units in the Central District, South Fair Oaks and East Colorado Specific Plans.

The Refined Project uses the same non-residential development caps for the Lincoln Avenue, Fair Oaks-Orange Grove, North Lake, and East Pasadena as compared to the proposed project. The Refined Project uses different development caps for non-residential units in the East Colorado and Lamanda Park Specific Plans, with East Colorado being slightly higher than the proposed project, and Lamanda Park being slightly lower than the proposed project. Finally the Refined Project uses the same non-residential development caps for the Central District and South Fair Oaks Specific Plans as the CD, SFO, LA Alternative.

In the Central District and South Fair Oaks Specific Plan areas, the recommendation balances the competing interests regarding residential development levels and sets residential development levels at the mid-point of what was studied between the proposed project and CD, SFO, LA Alternative. These recommendations acknowledge the development potential of the Central District and South Fair Oaks Specific Plan areas consistent with the General Plan's goal to directing growth towards transit, while tempering that potential in order to limit impacts. For non-residential development caps in the Central District and South Fair Oaks Specific Plan areas, the recommendation utilizes development caps based on an analysis of the amount of non-residential square footage that has historically been realized in those areas.

For the East Pasadena Specific Plan, the recommendation acknowledges the more suburban nature of these communities by reducing the residential development capacity as compared to the proposed project. For the East Colorado Specific Plan area, the Refined Project modifies the residential development cap to more accurately reflect the change in the Specific Plan's boundaries and the creation of the Lamanda Park Specific Plan.

Table 1 shows a comparison of the development caps between the proposed project, the CD, SFO, LA Alternative, and the Refined Project; and demonstrates that residential and nonresidential caps lie at or between the caps proposed for the proposed project and the caps proposed under the CD, SFO, LA Alternative.

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Table 1 Comparison of Proposed Project, CD/SFO/LA Alternative, and Refined Project: Net Increase from Existing Conditions

Specific Plan Area	Residential (dwelling units)			Non-residential (square feet)		
	Proposed Project	CD, SFO, LA Alternative	Refined Project	Proposed Project	CD, SFO, LA Alternative	Refined Project
Central District	6,147	4,722	5,444	3,846,649	2,561,847	2,561,847
South Fair Oaks	1,078	807	938	1,794,506	1,340,655	1,340,655
East Colorado	334	334	351	209,223	209,223	300,000
Lamanda Park	27	27	117	714,377	714,377	630,000
East Pasadena	1,442	1,442	1,090	1,107,875	1,107,875	1,107,875
North Lake	316	316	316	255,366	255,366	255,366
Fair Oaks / Orange Grove	323	323	323	308,984	308,394	308,984
Lincoln Ave	210	105	210	298,413	153,425	298,413
West Gateway	418	418	418	206,475	206,475	206,475
No Specific Plan	2,017	2,017	2,017	2,247,091	2,247,091	2,247,091
Total	12,312	10,511	11,223	10,988,959	9,104,727	9,256,705

Land Use Diagram

Refinements to the Land Use Diagram were made along with the development caps for the Refined Project to respond to changes requested by property owners, technical corrections, or changes made to align with construction or entitlements received during the preparation of the EIR. The changes affect a small number of parcels, which are listed below:

- Fuller Theological Union Master Plan
- South Orange Grove Boulevard (west side, Bellefontaine Street to Arlington Drive)
- 9th Circuit Court of Appeals, Vista Del Arroyo, Desiderio
- R&D Flex Space (Citywide)
- 710 Right-of-Way
- 2810 Eaton Canyon Drive & 3105 East Sierra Madre Boulevard

Goals and Policies

Changes to the Goals and Policies that resulted from comments received during the Draft EIR comment period were reviewed and included in the proposed Land Use Element (see Appendix E). The changes were generally limited to changes in phrases, terminology, or the clarification of particular concepts. Three new policies were added to the Goals and Policies in the Land Use Element. The first new policy was added to the Urban Form section supporting the enhancement of the pedestrian experience. This policy would benefit the pedestrian environment and would not result in any environmental impacts.

The second was a new policy addressing transitional heights specifically applicable to the North Lake Specific Plan area. It represents an effort to address concerns related to the contextual design and scale of mixed use

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or residential development that occurs on the North Lake Avenue corridor adjacent to established single and multi-family neighborhoods. This policy would further protect the historic neighborhood and enhance the aesthetic character of this area. Therefore, no new environmental impacts would result.

The final policy addition incentivizes high-quality design in new Planned Developments by allowing for a 15 percent increase in the FAR. Although there would be an increase in FAR, this would not affect the development caps, which are being reduced citywide by the Refined Project. The 15 percent increase in FAR would not result in any new environmental impacts.

None of the changes to the Goals and Policies of the General Plan would result in a new significant impact requiring recirculation pursuant to CEQA Guidelines Section 15088.5.

6.1.2 Environmental Analysis of the Refined Project

The following is environmental analysis of the Refined Project recommended for approval by the Planning Commission and City staff.

Aesthetics

The types of impacts associated with degradation of scenic vistas, decreased visual quality, and increased light and glare would be similar to the proposed project under the Refined Project. Development intensities would be reduced along the Central District and South Fair Oaks corridors. However, the overall character of development would be similar to the proposed project. Also similar to the proposed project, the Refined Project does not propose changes in the City's landform, introduce new areas of tall buildings that would block views, or promote redevelopment of entire neighborhoods.

The Refined Project would still concentrate new development within the downtown, corridors, and specific plan areas, with redevelopment on underutilized parcels occurring, incrementally. The character of the specific plan areas would continue to be defined by the adopted specific plans and design guidelines. For example, development in the Central District would be required to comply with Pasadena's Citywide Design Principles and Design Guidelines, Pasadena Design Guidelines for Historic Districts, and applicable specific plan design guidelines.

The Refined Project would have the potential to generate new light or glare sources. However, like the proposed project, any new improvements or developments would be subject to the Municipal Code and Design Guidelines, which would ensure that light and glare would be minimized. Overall, the aesthetic impacts associated with the Refined Project would be similar to the proposed project and would remain less than significant.

Air Quality

The Refined Project would reduce air quality pollutants compared to the proposed project due to the reduction in residential uses and nonresidential square footage. This would reduce impacts associated with construction and stationary source emissions. In addition, the project refinement would reduce vehicle trips and VMT compared to the proposed project, reducing long-term operational emissions.

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Although the project refinement would result in a reduction in air quality emissions, it would not eliminate significant long- and short-term criteria pollutant contributions of VOCs, NOX, CO, SO₂, PM₁₀, and PM_{2.5}; it would not be consistent with the air quality management plan, since criteria pollutants thresholds would be exceeded; and it would cumulatively contribute to the SoCAB nonattainment designations for O₃, PM₁₀, and PM_{2.5}. Implementation of the proposed Land Use Diagram was found to have significant and unavoidable impacts to long- and short-term air quality. The Refined Project would reduce some air quality impacts, but not eliminate any significant impacts.

Biological Impacts

Impacts on biological resources would be similar for the proposed project and the Refined Project since the City is largely built out and the overall geographic area available for development would not change. Threatened and endangered species have been observed or are expected to be present in Pasadena, as indicated in Section 5.3, *Biological Resources*, of the DEIR. However, prior to and during construction of individual projects, those projects would be required to follow the regulations of the California and federal Endangered Species Acts, including requirements of the USFWS regarding critical habitat. The Refined Project would allow development and redevelopment in areas containing waters of the United States, waters of the state, and wetland habitats. However, similar growth would be allowed under the proposed project and compliance with applicable federal and state regulations—including those related to Section 404 permits, Section 401 water quality certification, USFWS review, and CDFW 1600 Streambed Alteration Agreements—would be required under both scenarios.

Overall, even though development intensity would be reduced under the Refined Project, biological impacts caused by development are expected to be similar to those under the proposed project. This is due to the geographic footprint of growth shared by the two scenarios.

Cultural Resources

Under the Refined Project, overall development intensity would decrease slightly; however, the amount of acreage available for development and redevelopment would remain the same. As a result, impacts to cultural resources would be expected to be substantially similar to those of the proposed project. Similar to the proposed project, future construction activities adjacent to historic buildings have the potential to result in physical impacts or architectural damage due to construction-related vibration. Mitigation is required to ensure that impacts from construction activities would not damage a historical resource. Similar to the project, impacts would be less than significant with mitigation. Ground-disturbing activities associated with buildout of the Refined Project would continue to occur in order to accommodate new development and redevelopment. Consequently, the potential of encountering fossil-bearing soils and rock formations, destroying below-ground paleontological resources, and affecting archaeological sites and sites of cultural significance would still occur, similar to the proposed project. The Refined Project would be required to comply with the same mitigation measures to lessen or negate impacts. Therefore, implementation of the Refined Project would result in impacts similar to buildout of the proposed project, which would be less than significant with mitigation.

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Due to the reduced intensity of development allowed within the Central District, the Refined Project may have less potential to result in redevelopment that could impact adjacent historic buildings. However, the proposed project's impact to historic buildings is considered less than significant with mitigation.

Greenhouse Gas Emissions

The Refined Project would slightly reduce the proposed project's construction-related GHG emissions due to the reduction in residential dwelling units and nonresidential square footage at buildout. In addition, the project refinement would slightly decrease mobile source GHG emissions due to a decrease of 158,944 VMT (Fehr & Peers 2015) compared to the proposed project. Although there would be a reduction in GHG emissions overall, impacts would remain significant and unavoidable. Similar to the proposed project, the Refined Project would result in a reduction of GHG emissions per service population, but there would be a substantial increase in GHG emissions compared to existing conditions. Additionally, community-wide GHG emissions would not meet the long-term GHG reductions goal under Executive Order S-03-05.

Hazards and Hazardous Materials

There would be slightly less overall development allowed under the Refined Project, which would slightly reduce the quantity of hazardous materials being used and transported. Similar to the proposed project, buildout of the Refined Project would involve the use of hazardous materials during construction and could expose construction workers to hazardous materials during demolition or grading in contaminated areas. However, construction materials such as fuels, paints, and solvents would be used in limited quantities and would not pose a significant safety hazard. Like the proposed project, any remediation and or demolition activities associated with the Refined Project would be required to comply with the appropriate responsible agency (DTSC, RWQCB, LACoFD, or PFD), state standards, and guidelines.

The Refined Project would result in similar operational impacts to the proposed project since it would decrease the industrial land uses within the City. Industrial land uses typically result in an increase in the amount of hazardous materials being transported, used, and stored. Therefore, like the proposed project, the Refined Project would also reduce the number of people exposed to hazardous materials during transport on freeways and local roadways or near schools. The Refined Project would also comply with the Safety Element's goals, programs, and policies and comply with the existing regulations of several agencies, including DTSC, EPA, Cal/OSHA, PFD, and LACoFD.

The development area under the Refined Project would be similar to the proposed project. Therefore, as with the proposed project, development under the Refined Project could expose people to hazardous substances that may be present in soil or groundwater. Compliance with state law would ensure that impacts of General Plan buildout from listed hazardous materials sites would be less than significant under the Refined Project.

Development under the Refined Project would result in similar impacts related to fire hazard safety. New development would be required to meet the California Fire Code and Building Code requirements as well as the City's Safety Element to minimize the risk of fire hazards.

Overall, this impact of the Refined Project would be similar to the proposed project, but slightly decreased due to the reduction in overall development allowed.

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Hydrology and Water Quality

Implementation of the Refined Project would have similar hydrology and water quality impacts as the proposed project. Although both residential and nonresidential intensity would decrease under the project refinement, similar alterations to drainage patterns and hydrological patterns would occur. Similar to the proposed project, runoff would be subject to NPDES permit standards and provisions stipulated in the SWPPP and SUSMP. If necessary, treatment would be employed to remove excess pollutants from runoff during the construction and operational phases of development. Policies that offer additional protection from water quality impairment would be adopted, and runoff would be expected to be treated to the maximum extent practicable. In terms of water quality, the Refined Project would have a less than significant impact, like the proposed project.

Since designated open space areas remain the same and future development is not expected to result in a significant increase in impervious surfaces, the Refined Project's potential for depletion of groundwater and percolation of pollutants into groundwater aquifers would be less than significant, similar to the proposed project. No development or land use changes would occur near the recharge areas for the Raymond Groundwater Basin: the Arroyo Seco and Eaton Canyon Spreading Basins.

As under the proposed project, storm-drain infrastructure for new development projects would be required to be designed in accordance with standards in the LACDPW's Hydrology Manual. New storm drains must also comply with Pasadena Municipal Code Chapter 8.70 to control the rate of discharge so that it would not increase from existing conditions. Projects would be subject to additional review in order to ensure that they do not exceed the capacity of the storm drain system. The net effect would therefore be similar under both the proposed project and the Refined Project, and individual projects would not exceed the capacity of the storm drain system.

Similar to the proposed project, the Refined Project would not expose people or structures to a significant risk of loss, injury, or death in the case of dam failure. Overall, hydrology and water quality impacts would be similar for the Refined Project in comparison to the proposed project, and impacts would remain less than significant.

Land Use and Planning

Under the Refined Project, development intensities would be reduced overall, specifically, within the Central District and South Fair Oaks Specific Plan areas. Since the location and designation of land uses would remain similar to those in the General Plan Update, the Refined Project would also be consistent with applicable plans, including the SCAG 2012-2035 RTP/SCS and the State Complete Streets Act. Therefore, land use impacts would generally be the same. Impacts would remain less than significant.

Noise

The Refined Project would reduce short-term construction-related impacts associated with the proposed project since there would be an overall reduction in intensity allowed at buildout. Additionally, the reduction of residential and nonresidential development and construction activities would reduce potential short-term vibration impacts to sensitive receptors. However, due to the unknown number of construction activities that

6. Refined Project Environmental Analysis

could occur at any one time, their proximity to sensitive receptors, the longevity of activities, and the specific equipment required, construction-related noise impacts may not be reduced to less than significant levels for some projects. Therefore, like the proposed project construction-related noise impacts would remain significant and unavoidable.

The Refined Project would reduce residential units by 1,089 and nonresidential square footage by 1,732,254. The Refined Project would result in 752,143 vehicle trips per day, a decrease of 12,726 from the proposed project. This would result in a decrease in long-term noise impacts from vehicle sources, reducing ambient noise levels and impacts on new noise-sensitive land uses. Therefore, this impact would be less than the proposed project and, as under the proposed project, impacts would be less than significant.

The project refinement would result in a decrease in noise from stationary sources since there would be a reduction in nonresidential uses, including commercial and industrial uses that have a higher potential to generate noise from operations or loading docks. Similar to the project, the Refined Project would still be required to comply with the City's noise ordinance (Municipal Code 9.36), which would reduce impacts to less than significant.

Overall, the project refinement would reduce short-term construction-related and long-term noise impacts associated with the proposed project. However, the Refined Project's construction-related noise impacts would remain significant and unavoidable.

Population and Housing

Buildout of the Refined Project would result in 5,530 fewer jobs and 2,231 fewer residents than the proposed project. Under the Refined Project, the jobs-housing balance in the City at buildout would be slightly lower, at 2.06 (more housing rich), than the proposed project at 2.11. The San Gabriel Valley jobs-housing ratio would be 1.32 without the General Plan Update versus 1.34 with the proposed project. Upon buildout of the Refined Project, the region's jobs-housing ratio would be 1.33, which represents a nominal difference when compared to buildout of either the adopted General Plan or the proposed project. Therefore, while the Refined Project would have a benefit on the jobs-housing balance in the region, it would not occur to the same degree as the proposed project. The Refined Project would also provide fewer housing units near transit corridors and regional employment centers. Overall, impacts to population associated with the Refined Project would be similar to the proposed project and would remain less than significant.

Public Services

Buildout of the Refined Project would result in 2,231 fewer residents and 1,089 fewer homes. Impacts associated with fire protection, law enforcement, and library services would therefore be less than those of to the proposed project, since there would be less residential development at full buildout, which would generate fewer new residents. Demands for fire, police, and library services would be updated as part of the City's annual budget process. Impacts to school services would be less than significant through the application of SB 50 fees on individual project applicants. Overall, impacts would be reduced compared to the proposed project and would remain less than significant.

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Recreation

The Refined Project would slightly reduce demands on existing recreational facilities due to the reduction in residents and employees. As a result, less parkland would be required to serve the projected population at buildout. Impacts would remain less than significant.

Transportation and Traffic

Fehr & Peers conducted a transportation analysis of the Refined Project, included herein as Appendix F.

Under the Refined Project, a service population of 307,321 would drive 6,804,532 VMT per day and make 752,143 vehicle trips per day, which is equivalent to 22.1 VMT per capita and 2.4 vehicle trips per capita (Fehr & Peers 2015). Therefore the Refined Project would result in a reduced VMT and vehicle trips overall and the same VMT per capita and vehicle trips per capita as the proposed project. As with the proposed project, the Refined Project would reduce impacts to VMT per capita and vehicle trips per capita compared to existing conditions.

With respect to the proximity and quality of the bicycle and transit network, the Refined Project would result in similar impacts as the proposed project. As shown in Table 2, the Refined Project has a similar percentage of service population within a quarter mile of Level 1 and 2 bicycle facilities; there is a 0.4 percent decrease and 0.3 percent increase in service population within a quarter mile of Level 1 and 2 facilities, respectively. This represents a cumulative decrease of 0.1 percent compared to the proposed project. Although there would be a slight decrease of service population within a quarter mile of Level 1 and 2 facilities, there would be a significant improvement over existing conditions. Impacts would remain less than significant.

Table 2 Proximity and Quality of Bicycle Network

Scenario	Total Service Population	Percent of Total		
		Level 1	Level 2	Level 3
Existing	247,286	0.0%	31.7%	50.0%
Proposed Project	315,082	15.2%	54.8%	20.4%
Refined Project	307,321	14.8%	55.1%	20.4%

Source: Fehr & Peers, 2015.

As shown in Table 3, the project refinement would result in a slight increase in impact with respect to proximity to the transit network since the percentage of service population near Level 1 transit facilities is reduced. Overall, the Refined Project would result in a slight decrease of 0.5 percent for Level 1 and Level 2 facilities. As with the proposed project, the Refined Project would reduce impacts compared to existing conditions and no new significant impacts would result.

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Table 3 Proximity and Quality of Transit Network

Scenario	Total Service Population	Percent of Total		
		Level 1	Level 2	Level 3
Existing	247,286	36.6%	30.0%	20.4%
Proposed Project	315,082	50.2%	22.7%	15.3%
Refined Project	307,321	49.5%	22.9%	15.6%

Source: Fehr & Peers, 2015.

Pedestrian accessibility would be the same under the Refined Project compared to the proposed project, with a PAS of 5.1(B).

Tables 4 and 5 show the results of the CMP analysis for freeway mainline segments and arterial intersections, respectively. The Refined Project would result in the same impacts as the proposed project—a significant impact on I-210 w/Rte134/710 in the PM peak hour for westbound lanes and on I-210 w/Rosemead Boulevard in the AM peak hour for westbound lanes. Compared to the proposed project, the Refined Project would have the same impact on CMP arterial intersections, resulting in a significant impact at Pasadena Avenue/California Boulevard in the AM peak hour.

Table 4 CMP Analysis Results For Freeway Mainline Segments, Refined Project

CMP Station	Peak Hour	Dir	Lanes	Capacity	Volume	D/C	LOS	Change in D/C	Significant Impact?
1056 SR 134 w/o San Rafael Ave	AM	EB	5	10,00	8,500	0.850	D	0.100	No
		WB	5	10,00	9,600	0.960	E	0.090	No
	PM	EB	5	10,00	9,600	0.960	E	0.090	No
		WB	5	10,00	8,900	0.890	D	0.060	No
1060 I-210 w/o Rte 134/710	AM	EB	4	8,000	6,600	0.825	D	0.125	No
		WB	4	8,000	6,400	0.800	D	0.262	No
	PM	EB	4	8,000	5,900	0.738	C	0.225	No
		WB	4	8,000	8,400	1.050	F(0)	0.237	Yes
1061. I-210 w/o Rosemead Blvd	AM	EB	5	10,00	6,700	0.670	C	0.020	No
		WB	5	10,00	11,440	1.144	F(0)	0.070	Yes
	PM	EB	5	10,00	6,300	0.630	C	0.020	No
		WB	5	10,00	8,500	0.850	D	0.000	No

Source: Fehr & Peers, 2015.

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Table 5 CMP Analysis Results for Arterial Intersections, Refined Project

CMP Intersection	Peak	V/C	LOS	Change in	Significant
Arroyo Parkway / California Boulevard	AM	0.828	D	0.154	No
	PM	0.855	D	0.044	No
Pasadena Avenue / California Boulevard	AM	1.011	F	0.055	Yes
	PM	0.946	E	0.042	No
St. John Avenue / California Boulevard	AM	0.872	D	0.099	No
	PM	0.769	C	0.081	No
Rosemead Boulevard / Foothill Boulevard	AM	0.825	D	0.127	No
	PM	0.926	E	0.064	No

Source: Fehr & Peers, 2015.

Overall, impacts are the same as the proposed project. Impacts related to CMP mainline segments and arterial intersections would remain significant and unavoidable.

Utilities and Service Systems

Under the Refined Project, impacts to utilities and service systems would be reduced due to the reduction in residential units and overall intensity. The project refinement would result in a reduction of 1,089 residences and 5,530 employees, thereby reducing the demand on water services and energy. The Refined Project would also reduce the generation of wastewater and solid waste. Impacts would be reduced and remain less than significant.

Summary of Impact Analysis

Compared to the proposed project, the Refined Project would have similar impacts for aesthetics, biological resources, hydrology and water quality, land use and planning, population and housing, and transportation and traffic impacts. Impacts would be reduced for air quality, cultural resources, GHG emissions, hazards and hazardous materials, noise, public services, recreation, traffic, and utilities and service systems. Although the project refinement would reduce environmental impacts in nine impact categories, significant unavoidable adverse impacts identified by the proposed project for air quality, GHG emissions, noise, and traffic would not be eliminated.

6.1.3 CONCLUSION

The above analysis demonstrates that the Refined Project would not result in a new significant impact or a substantial increase in the severity of an impact already disclosed in the EIR. Therefore, revisions to the EIR are not necessary and, pursuant to Section 15088.5 of the CEQA Guidelines, recirculation of the EIR is not required.

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