RESOLUTION NO. _____

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PASADENA CERTIFYING THE FINAL EIR (SCH No.2021080103) FOR THE AFFINITY PROJECT, ADOPTING ENVIRONMENTAL FINDINGS, AND A MITIGATION MONITORING AND REPORTING PROGRAM

WHEREAS, the Affinity Project (the "project") proposes a Planned Development (PD) District and Variance for Historic Resources (VHR) on a 3.3 acre site consisting of five parcels, on which six (of the nine) existing commercial buildings will be demolished, and two, seven-story buildings consisting of medical office uses, assisted living and independent living uses (including up to 95 senior housing units), and ground floor commercial uses will be constructed. Included in the request is the ability to exchange the medical office use for up to 197 residential dwelling units. Up to five new levels of subterranean parking would be provided. Three existing buildings would be retained including the Whole Foods Market and the subterranean parking structure at 465 South Arroyo Parkway, and two historic structures at 501 and 523 South Arroyo Parkway.

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

WHEREAS, the City prepared an Environmental Impact Report ("EIR") for the Project, and circulated a Draft EIR for public review and received public comment thereon. The Final EIR concluded that there were no significant and unavoidable impacts; and

WHEREAS, the Findings made in Attachment 1 to this Resolution are based upon the information and evidence set forth in the EIR and upon other substantial evidence provided in the record of the proceedings. The documents, staff reports, technical studies, appendices, plans, specifications, and other materials that constitute the record of proceedings on which this Resolution is based are on file and available for public examination during normal business hours in the Planning & Community Development Department at 175 North

Garfield Avenue, Pasadena, California 91101 and with the Director of Planning & Community Development, who serves as the custodian of these records; and

WHEREAS, the City Council finds that agencies and interested members of the public have been afforded ample notice and opportunity to comment on the EIR and that the comment process has fulfilled all requirements of State and local law, and finds that the information and issues raised by the comments did not constitute new information requiring recirculation of the Draft EIR; and

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

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

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NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF PASADENA RESOLVES AS FOLLOWS:

The City Council of the City of Pasadena hereby certifies the Final EIR, adopts Environmental Findings, and a Mitigation Monitoring and Reporting Program, as set forth in Attachment 1 hereto.

Adopted at the _____ meeting of the City Council on the _____ day of _____, 2022 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

_____
Mark Jomsky
City Clerk

APPROVED AS TO FORM:

_____
Theresa E. Fuentes
Assistant City Attorney

Attachment #1

Findings of Fact
SCH No. 2021080103

Affinity Project

Prepared for
City of Pasadena
Planning and Community Development Department
175 North Garfield
Pasadena, California 91101

Prepared by
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225 South Lake Avenue, Suite 1000
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May 2022

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SECTION 1.0 INTRODUCTION

1.1 REQUIREMENT FOR FINDINGS OF FACT

The California Environmental Quality Act (CEQA) (Section 21002.1 of the California Public Resources Code [PRC]) and the State CEQA Guidelines (Section 15000 et. seq. of Title 14, *California Code of Regulations* [CCR]) require that the Lead Agency analyze and provide findings on a project's environmental impacts before approving that project. If a project will generate significant environmental effects that cannot be avoided or substantially lessened, then before approving the project, the lead agency must provide a statement of overriding considerations documenting that the project's benefits outweigh its unavoidable adverse significant environmental effects.

The City of Pasadena (City) in its capacity as the CEQA Lead Agency, has prepared these Findings of Fact (Findings) to comply with CEQA and the State CEQA Guidelines for the proposed Affinity Project (Project or Project with Building A Residential/Commercial). The determination that the City is the Lead Agency is made in accordance with Section 15051 of the State CEQA Guidelines, which defines the Lead Agency as the public agency that has the principal responsibility for carrying out or approving a proposed project. Regarding the Findings, Section 15091 of the State CEQA Guidelines establishes the following requirements:

(a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

(b) The findings required by subdivision (a) shall be supported by substantial evidence in the record.

(c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subdivision (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

(d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.

(e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.

(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The "changes or alterations" under Section 15091(a)(1) that would avoid or substantially lessen a project's significant environmental effects can include a variety of measures or actions, including but not limited to:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

A Statement of Overriding Considerations states that the decision-making body has balanced the benefits of a project against its unavoidable significant environmental effects and has determined that the benefits of a project outweigh the adverse effects and, therefore, the adverse effects are considered acceptable. Because the Project would not result in any significant and unavoidable impacts, a Statement of Overriding Considerations is not required for the Project.

Having received, reviewed, and considered the Final Environmental Impact Report (Final EIR) for the Affinity Project (State Clearinghouse [SCH] No. 2021080103), as well as all other information in the record of proceedings on this matter, the following Findings are hereby adopted by the City of Pasadena. The Findings set forth the environmental and other bases for current and subsequent discretionary actions to be undertaken by City, as the Lead Agency, and responsible agencies for the implementation of the Project.

1.2 PROJECT SUMMARY

The Project site encompasses approximately 3.3 acres (144,853 square feet [sf]) located between 465 and 577 South Arroyo Parkway, City of Pasadena, Los Angeles County. The site is bound by East Bellevue Drive on the north, South Arroyo Parkway on the east, East California Boulevard on the south, and the Metro Gold (L) Line on the west. Regional access to the site is provided by State Route (SR) 110 located approximately 0.6-mile due south on Arroyo Parkway. Local access is provided by adjacent surface streets and Metro's Del Mar and Fillmore Stations located approximately 0.2-miles to the north and south, respectively.

The Project Applicant requests approval to rezone the Project site from CD-6 (Central District Specific Plan [CDSP], Arroyo Corridor/Fair Oaks subdistrict), to a Planned Development (PD) zone, and approval of a PD Plan. The Project involves demolition of six (of the nine) existing buildings totaling 45,912 sf, located at 491, 495, 499, 503, 541, and 577 South Arroyo Parkway and construction of two new buildings: (1) a 154,000-sf, 7-story (aboveground) medical office building with ground-floor commercial uses (Building A); and (2) a 184,376-sf, 7-story (aboveground) assisted living building with 85,800 sf of assisted living uses and 98,576 sf of independent living uses including up to 95 one- and two-bedroom senior housing units (Building B). As proposed, there would be five subterranean levels providing up to 850 parking spaces. Approximately 31,605 sf of open space, including public and private (for solely resident and staff use) space would be provided across the Project site.

Alternatively, the proposed PD Plan would provide the flexibility to exchange the uses in Building A from medical office and ground floor commercial for the following:

- 3,000 sf of commercial and a sales/leasing management office on the ground floor;
- Up to 197 residential dwelling units; and
- Up to 650 parking spaces in 4 subterranean levels (one less than the Project).

Although the Project is the choice that is anticipated to be constructed, the flexibility to exchange uses in Building A would enable the Project to respond to the economic needs and demands of the City at the time of Project implementation. The proposed site layout and the aboveground height, mass, and other parameters of the Building A design would remain the same regardless of the scenario constructed, if approved. The PD Plan would define all aspects of site design and provide caps on the types and amounts of allowable land uses, regardless of whether Building A is developed with medical office or residential dwelling units. It is noted that based on the development cap of 87 dwelling units per acre (du/acre), a total of 289 units could be constructed. Therefore, if a total of 197 units were constructed in Building A, only 92 senior housing units could be constructed in Building B. Conversely, if 95 senior housing (i.e., independent living) units were constructed in Building B, only 194 units could be constructed in Building A.

A total of approximately 79,553 sf of the existing development on site would be retained and integrated into the Project, including the Whole Foods grocery store and associated 275-space subterranean parking structure at 465 South Arroyo Parkway and the two historic structures at 501 and 523 South Arroyo Parkway. The Applicant anticipates that restaurant uses would occupy the approximately 5,882 sf of space in the existing buildings to be retained at 501 and 523 South Arroyo Parkway.

A total of five levels of subterranean parking spanning both proposed buildings with up to 850 parking spaces would also be constructed to serve the new development as well as the existing structures at 501 and 523 Arroyo Parkway under the Project. For the Project with Building A Residential/Commercial, a total of four levels of subterranean parking spanning both proposed buildings with up to 650 parking spaces would be constructed. The Project uses south of Whole Foods Grocery would have three ingress/egress points–one on California Boulevard and two on South Arroyo Parkway. Whole Foods Grocery would retain the entrance on East Bellevue Drive and the exit onto South Arroyo Parkway.

1.3 FINDING REGARDING CERTIFICATION OF THE EIR

Pursuant to Section 15090 of the State CEQA Guidelines, the City Council certifies that: (1) it has reviewed and considered the Final EIR prior to approving the project; (2) the Final EIR is an accurate and objective statement that fully complies with CEQA, the State CEQA Guidelines, and the City's local environmental guidelines; and (3) the Final EIR reflects the independent judgement of the City of Pasadena. The City Council certifies the Final EIR based on the findings and conclusions presented herein.

1.4 FINDING REGARDING ADOPTION OF MITIGATION MONITORING AND REPORTING PROGRAM

Pursuant to Section 21081.6 of the PRC, the City Council hereby adopts the Mitigation Monitoring and Reporting Program (MMRP) attached to this Resolution as Attachment 1, and incorporated herein. This MMRP includes all of the mitigation measures analyzed in the Draft EIR, inclusive of any clarifications or revisions associated with the Reponse to Comments on the Draft EIR, which

are applicable to the Project, Project with Building A Residential/Commercial, and Alternatives 2 through 4.

1.5 FINDING REGARDING CUSTODIAN OF RECORDS

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

SECTION 2.0 FINDINGS REGARDING ENVIRONMENTAL ISSUES NOT ANALYZED IN THE EIR

The City Council hereby finds that the following environmental issues were found to have no impacts or less than significant impacts in the Initial Study (see Appendix A-1 of the Draft EIR), did not require the imposition of mitigation measures, and therefore did not require analyses in the Draft EIR:

- Aesthetics;
- Agricultural and Forestry Resources;
- Air Quality (Odors);
- Biological Resources;
- Cultural Resources (Human Remains);
- Geology and Soils;
- Hazards and Hazardous Materials (Accidental Release of Hazardous Materials, Location Near Airport, Emergency Response/Evacuation Plan, Wildfire);
- Hydrology and Water Quality;
- Land Use and Planning (Dividing a Community);
- Mineral Resources;
- Noise (Location Near Airport);
- Population and Housing; and
- Wildfire.

SECTION 3.0 FINDINGS REGARDING IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT WITHOUT MITIGATION

Consistent with Section 21002.1 of the PRC and Section 15128 of the State CEQA Guidelines, the Final EIR focused its analysis on topics with potentially significant impacts, and limited discussion of other topics with no potential for significant adverse environmental impacts. For each environmental topic within this category, the discussion below includes: (1) a listing of the environmental topics evaluated in the Draft EIR for which there would be no impact or a less than significant impact without mitigation and the Draft EIR page citations where the relevant discussion begins, (2) indication that no mitigation measures (MMs) are required, (3) findings pursuant to Section 15091 of the State CEQA Guidelines for that topic, and (4) explanation of the substantial evidence in support of the Draft EIR conclusion that there would be no impact or a less than significant impact related to the identified topics (i.e., thresholds).

Section 15091 of the State CEQA Guidelines does not require specific findings to address environmental effects that an EIR identifies as "no impact" or a "less than significant" impact. Nonetheless, the City Council hereby finds that the Project and Project with Building A Residential/Commercial would have either no impact or a less than significant impact pertaining to the following resource areas and environmental checklist questions.

3.1 AIR QUALITY (SECTION 3.1 OF THE EIR)

Potential Impacts Evaluated

- Would the project conflict with or obstruct implementation of the applicable air quality plan? (Draft EIR, p. 3.1-14)
- Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard? (Draft EIR, p. 3.1-16)
- Would the project expose sensitive receptors to substantial pollutant concentrations? (Draft EIR, p. 3.1-24)

Proposed Mitigation

None required.

Findings Pursuant to Section 15091 of the State CEQA Guidelines

As noted above and explained below, the Draft EIR analysis determined that implementation of both the Project and Project with Building A Residential/Commercial would not result in significant impacts related to air quality. As such, findings under Section 15091 of the State CEQA Guidelines are not warranted.

Supporting Explanation

Project and Project with Building A Residential/Commercial

Construction and operation of the Project and Project with Building A Residential/Commercial would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment under applicable federal or State Ambient Air Quality Standards (AAQS) (refer to Tables 3.1-6 through 3.1-13 and associated analysis on pages 3.1-17 through

3.1-24 of the Draft EIR). There would be less than significant impacts, and no mitigation is required. (Draft EIR, p. 3.1-15 through 3.1-24)

Accordingly, the Project and Project with Building A Residential/Commercial would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emissions reductions in the South Coast Air Quality Management District's (SCAQMD's) *2016 Air Quality Management Plan* (AQMP). Therefore, neither the Project nor Project with Building A Residential/Commercial would conflict with AQMP first criterion of AQMP consistency. Regarding the second criterion, the Project site is within both a High-Quality Transit Area (HQTA) and Transit Priority Area (TPA). The Project site is suitably located to encourage the use of public transit and active transportation modes for the residences, employees, and visitors to the Project site. Positioning a mix-use development, under either scenario, in proximity of the L Line and bus lines would encourage the use of mass transit which is consistent with the AQMP's goal of using non-single occupancy vehicles. Additionally, the Project and Project with Building A Residential/Commercial would be consistent with the existing General Plan designation for the site of High Mixed-Use; as such, the Project and Project with Building A Residential/Commercial would not exceed the anticipated growth accounted for within the Land Use Element of the City's General Plan, which helped formed the basis of the AQMP. Therefore, the Project and Project with Building A Residential/Commercial would not result in a conflict with or obstruct implementation of the applicable air quality plan–SCAQMD's 2016 AQMP. There would be less than significant impacts, and no mitigation is required. (Draft EIR, p. 3.1-13 through 3.1-15)

Exposure of sensitive receptors was addressed for emissions from construction and operation of the Project and Project with Building A Residential/Commercial. To address construction activities, the analysis below addresses the following issues: localized air quality impacts; and toxic air contaminants (TACs), specifically diesel particulate matter (DPM) from on-site construction. To address operational emissions, the analysis evaluates potential exposure to sensitive receptors, the analysis below discusses local air quality impacts from on-site operations, and carbon monoxide (CO) hotspots. The proposed residential and commercial uses do not generate substantial quantities of TACs and are therefore not addressed in the Draft EIR. Localized impacts from construction and operation were found to be less than the applicable SCAQMD localized significance thresholds (LST) screening thresholds (see Tables 3.1-7, 3.1-9, 3.1-11, and 3.1-13 and associated analysis on pages 3.1-18 through 3.1-24 of the Draft EIR). Regarding TACs (DPM), there would be relatively few pieces of off-road, heavy-duty diesel equipment in operation, and the total construction period of approximately 34 months would be relatively short when compared to a 40-year exposure period, consistent with Office of Environmental Health Hazard Assessment methodology. Combined with the highly dispersive properties of DPM and additional reductions in particulate emissions from newer construction equipment, as required by federal and State regulations, construction emissions of TACs for both the Project and Project with Building A Residential/Commercial were determined not to represent a substantial exposure to sensitive receptors. In an urban setting, vehicle exhaust is the primary source of CO. Localized areas where ambient concentrations exceed federal and/or State standards for CO are termed CO "hotspots". If impacts are less than significant close to congested intersections (as measured by level of service [LOS]), impacts also would be less than significant at more distant sensitive receptor locations. Based on data in the Transportation Impact Analysis – Outside of CEQA Analysis prepared for Project and Project with Building A Residential/Commercial, based on PM peak hour traffic volumes average daily traffic at the Arroyo Parkway/California Street intersection under Existing Plus Project conditions is conservatively estimated at 48,000 vehicles for the Project and a conservatively estimated 45,000 vehicles for the Project with Building A Residential/Commercial. The 48,000 or 45,000 daily trips at this intersection is substantially less than the 400,000 vehicles per day needed to exceed the CO

standards. Therefore, CO concentrations at the intersection would be substantially less than the CO ambient air quality standards. There would be less than significant impacts, and no mitigation is required. (Draft EIR, p. 3.1-24 through 3.1-27)

Cumulative Impacts

Project and Project with Building A Residential/Commercial

Consistency with the SCAQMD's AQMP is not subject to cumulative impact analysis. However, cumulative construction and operational impacts were analyzed and found to be less than significant, as discussed above. SCAQMD's policy with respect to cumulative impacts–impacts that would be directly less than significant on a project level would also be cumulatively less than significant– is applicable to the TAC analysis. Direct TAC impacts would be less than significant; therefore, cumulative TAC impacts would be less than significant for the Project. With respect to CO hotspot impacts, although cumulative traffic is not expressly addressed in the Transportation Impact Analysis – Outside of CEQA Analysis reports, the Existing Plus Project traffic volume at the Arroyo Parkway/California Street intersection (which has the worst LOS) is substantially below the level of concern such that cumulative traffic could not approach the level of significance. There would be no cumulatively considerable impacts with implementation of the Project or Project with Building A Residential/Commercial, and no mitigation is required. (Draft EIR, p. 3.1-27 through 3.1-29)

3.2 CULTURAL AND PALEONTOLOGICAL RESOURCES (SECTION 3.2 OF THE EIR)

Potential Impacts Evaluated

- Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Draft EIR, p. 3.2-14)

Proposed Mitigation

None required.

Findings Pursuant to Section 15091 of the State CEQA Guidelines

As noted above and explained below, the Draft EIR analysis determined that implementation of both the Project and Project with Building A Residential/Commercial would not result in significant impacts related to paleontological resources. As such, findings under Section 15091 of the State CEQA Guidelines are not warranted.

Supporting Explanation

Project and Project with Building A Residential/Commercial

No unique geologic features are known to exist, and no fossils have been documented on the Project site. The Project would involve excavation for five subterranean parking levels spanning both proposed buildings; the Project with Building A Residential/Commercial would have one less level of subterranean parking. The City's General Plan EIR states that grading and excavations deeper than six feet into the Topanga Formation have the potential to impact significant fossils. However, neither the Project nor Project with Building A Residential/Commercial would involve excavation in the Topanga Formation. There would be less than significant impacts, and no mitigation is required. (Draft EIR, p. 3.2-12 through 3.2-15)

Cumulative Impacts

Project and Project with Building A Residential/Commercial

Although cultural resources (which includes paleontological resources) are site-specific regarding any given resource, impacts may be considered cumulative simply because they relate to the loss of cultural resources in general over time throughout the region. Regarding paleontological resources, the Project site is not located in the portions of the City considered to be paleontologically sensitive. Therefore, the Project would not result in a cumulatively considerable impact to paleontological resources. (Draft EIR, p. 3.2-15 through 3.2-16)

3.3 ENERGY (SECTION 3.3 OF THE EIR)

Potential Impacts Evaluated

- Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (Draft EIR, p. 3.3-4)

- Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (Draft EIR, p. 3.3-7)

Proposed Mitigation

None required.

Findings Pursuant to Section 15091 of the State CEQA Guidelines

As noted above and explained below, the Draft EIR analysis determined that implementation of both the Project and Project with Building A Residential/Commercial would not result in significant impacts related to energy. As such, findings under Section 15091 of the State CEQA Guidelines are not warranted.

Supporting Explanation

Project and Project with Building A Residential/Commercial

Construction and operation of the Project and Project with Building A Residential/Commercial would require the use of energy (refer to Tables 3.3-1 through 3.3-4 on pages 3.3-4 through 3.3-7 of the Draft EIR). During construction, transportation energy would be used for the transport and use of construction equipment, from delivery vehicles and haul trucks, and from construction employee vehicles that would use gasoline and/or diesel fuel. Fuel energy consumed during construction would also be temporary in nature, and there are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the region or State. Further, short-term energy usage for construction would result in long-term energy savings from newly constructed buildings that are compliant with the current State energy efficiency requirements.

Strategies and measures for increased energy efficiency have been implemented at the State level with California's Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings and the CALGreen Code. The Project and Project with Building A Residential/Commercial would be more energy-efficient than the existing buildings in the vicinity

of the site, including the buildings to be demolished. The CALGreen Code requires the development of electric vehicle charging infrastructure to promote and support alternatively fueled vehicles and bicycling. The Project and Project with Building A Residential/Commercial would also be consistent with the City's Green City Action Plan, by increasing energy efficiency for buildings, developing higher density, mixed-use, walkable, bikeable, and disabled-accessible neighborhoods which coordinate land use and transportation. Also, the Project site is within both HQTA and TPA; the proposed land uses near transit support alternative transportation modes.

Construction and operation of the Project and Project with Building A Residential/Commercial would not result in wasteful, inefficient, or unnecessary construction of energy resources, nor conflict with or obstruct the applicable State or local plans for renewable energy and energy efficiency. There would be a less than significant impacts, and no mitigation is required. (Draft EIR, p. 3.3-4 through 3.3-8)

Cumulative Impacts

Project and Project with Building A Residential/Commercial

The geographic area for consideration of cumulative impacts is the City. Future development throughout the City would generate additional energy demand and construction and operational fuel energy demand. Future development projects in the City would also need to comply with all applicable local and State energy efficiency and renewable energy regulations. The electrification of the transportation sector is anticipated throughout California and would contribute to reduced fuel energy use related to future development throughout the City. Also, regional (i.e., Southern California Association of Governments [SCAG]) planning documents support a denser land use pattern with a focus on proximity to transit. Therefore, neither the Project nor Project with Building A Residential/Commercial would result in a cumulatively considerable impact related to energy. (Draft EIR, p. 3.3-8)

3.4 GREENHOUSE GAS EMISSIONS (SECTION 3.4 OF THE EIR)

Potential Impacts Evaluated

- Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Draft EIR, p. 3.4-14)
- Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gas emissions? (Draft EIR, p. 3.4-19)

Proposed Mitigation

None required.

Findings Pursuant to Section 15091 of the State CEQA Guidelines

As noted above and explained below, the Draft EIR analysis determined that implementation of both the Project and Project with Building A Residential/Commercial would not result in significant impacts related to greenhouse gas emissions. As such, findings under Section 15091 of the State CEQA Guidelines are not warranted.

Supporting Explanation

Project and Project with Building A Residential/Commercial

Construction and operation of the Project and Project with Building A Residential/Commercial would result in greenhouse gas (GHG) emissions. The principal source of construction-related GHG emissions would be from internal combustion engines of construction equipment, on-road construction vehicles, and workers' commuting vehicles. Operational emissions are comprised of area, energy, mobile, stationary source, waste, and water emissions. Operational GHG emissions would come primarily from energy; other sources include mobile trips; water consumption; natural gas for space and water heating; and gasoline-powered landscaping and maintenance equipment.

The *Climate Action Plan* (CAP), adopted by the City in March 2018, is a long-range planning document that guides the City towards long-term emissions reductions in accordance with State of California goals. The CAP Checklist is a tool for new development projects to demonstrate consistency with the CAP, as a qualified GHG reduction plan in accordance with Section 15183.5 of the State CEQA Guidelines. The Option B GHG efficiency metric of the City's CAP was used for this analysis. Per the City's CAP, this method recognizes that highly efficient projects (e.g., compact and mixed-use development) with relatively high mass emissions may nevertheless meet the local and State GHG reduction goals/targets. Using the demographic projections developed for the CAP, the City has developed service person efficiency thresholds for the years of 2020, 2025, 2030 and 2035 which are consistent with Pasadena's GHG emission goals included in the CAP and the State targets it is designed to achieve (AB 32, SB 32, and substantial progress towards EO S-3-05). Neither the Project's GHG efficiency metric of 3.52 metric tons of carbon dioxide equivalent per service person ($MTCO_2e/SP$) nor the Project with Building A Residential/Commercial's GHG efficiency metric of 2.15 $MTCO_2e/SP$ would exceed the City's CAP GHG efficiency threshold of 3.57 $MTCO_2e/SP$ for 2026 (refer to Tables 3.4-6 and 3.4-9 on pages 3.4-16 and 3.4-19 of the Draft EIR).

To provide further substantiation that the Project and Project with Building A Residential/Commercial would be consistent with State plans, policies, and regulations, consistency with the SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) *Connect SoCal*, CARB's California's Climate Change Scoping Plan (Scoping Plan), and Statewide GHG reduction goals for 2030 or 2050 was addressed in the Draft EIR. The Project and Project with Building A Residential/Commercial were determined not to conflict with SCAG's *Connect SoCal* plan and not to impede the State's trajectory toward Statewide GHG reduction goals for 2030 or 2050. The Project and Project with Building A Residential/Commercial would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions. There would be a less than significant impact, and no mitigation is required. (Draft EIR, p. 3.4-14 through 3.4-22)

Cumulative Impacts

Project and Project with Building A Residential/Commercial

Because the magnitude of global GHG emissions is extremely large when compared with the emissions of typical development projects, it is accepted as very unlikely that any individual development project would have GHG emissions of a magnitude to directly impact global climate change. Therefore, the analysis summarized above represents the cumulative impact analysis of

GHG emissions. As discussed, there would be less than significant impacts, and no mitigation is required. (Draft EIR, p. 3.4-22)

3.5 HAZARDS AND HAZARDOUS MATERIALS /WILDFIRE (SECTION 3.5 OF THE EIR)

Potential Impacts Evaluated

- Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Draft EIR, p. 3.5-10)
- Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter-mile of an existing or proposed school? (Draft EIR, p. 3.5-11)
- Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (Draft EIR, p. 3.5-12)

Proposed Mitigation

None required.

Findings Pursuant to Section 15091 of the State CEQA Guidelines

As noted above and explained below, the Draft EIR analysis determined that implementation of both the Project and Project with Building A Residential/Commercial would not result in significant impacts related to hazards and hazardous materials. As such, findings under Section 15091 of the State CEQA Guidelines are not warranted.

Supporting Explanation

Project and Project with Building A Residential/Commercial

The Project site is not on the State of California Hazardous Waste and Substances Sites List of sites published by California Environmental Protection Agency (CalEPA) and compiled pursuant to Section 65962.5 of the *California Government Code* (referred to as the Cortese List). Further, there are no conditions present on the site due to current or historic land uses such that excavation activities would be expected to encounter on-site contamination. Compliance with SCAQMD Rule 1403 and the California Division of Occupational Safety and Health's (CalOSHA's) Title 8 regulations on asbestos and lead abatement would be a condition of approval and would ensure that handling and disposal of these materials is conducted safely, and accident conditions during demolition activities would not be reasonably foreseeable. Handling and transport of hazardous materials, that would represent a significant hazard to construction workers, the public, or the environment, is not anticipated.

Operation of medical and medical-related facilities, such as the medical offices in Building A and/or assisted living facilities in Building B, would involve the routine transport, use, and disposal of hazardous materials (e.g., pharmaceutical products, medical gases, radioisotopes and x-ray producing machines, cleaners, solvents, medical and biological wastes). Health care facilities in California are licensed, regulated, inspected, and/or certified by several public and private agencies at the State and federal levels. All hazardous materials and/or wastes associated with the Project and Project with Building A Residential/Commercial, including those related to proposed commercial uses and the presence of diesel emergency generators, would be managed

and disposed in compliance with local, regional, State, and federal regulations. Thus, the Project and Project with Building A Residential/Commercial would not result in a significant hazard to the public or the environment related to the routine transport, use, disposal, and storage of hazardous materials. Construction and operation of the Project would not adversely affect schools in the vicinity through compliance with applicable regulations. There would be a less than significant impacts, and no mitigation is required. (Draft EIR, p. 3.5-10 through 3.5-13)

Cumulative Impacts

Project and Project with Building A Residential/Commercial

Existing developments in the City, including health care facilities, pose risks to public health and safety with respect to the use, storage, handling, generation, transport, and disposal of hazardous materials. Future developments throughout the City would increase these risks as more facilities or operations may utilize hazardous materials or may be located on the Cortese list or other hazardous materials databases. Regulations for a variety of activities and uses to protect public health and safety exist at all levels of government. Compliance of individual projects, including the Project and Project with Building A Residential/Commercial, with pertinent regulations would preserve public health and safety and would prevent hazards to existing and future developments. Therefore, the Project's and Project with Building A Residential/Commercial's contribution to cumulative impacts would be less than significant, and no mitigation is required. (Draft EIR, p. 3.5- through 3.5-13)

3.6 LAND USE AND PLANNING (SECTION 3.6 OF THE EIR)

Potential Impacts Evaluated

- Would the proposed project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (Draft EIR, p. 3.6-6)

Proposed Mitigation

None required.

Findings Pursuant to Section 15091 of the State CEQA Guidelines

As noted above and explained below, the Draft EIR analysis determined that implementation of both the Project and Project with Building A Residential/Commercial would not result in significant impacts related to land use and planning. As such, findings under Section 15091 of the State CEQA Guidelines are not warranted.

Supporting Explanation

Project and Project with Building A Residential/Commercial

The Project would not require a General Plan amendment and would be consistent with the Guiding Principles of the City's General Plan Land Use Element and numerous goals and policies related to avoiding or reducing environmental impacts. The primary land use planning documents that govern the Project site are the City's General Plan, Central District Specific Plan (CDSP), and the City's zoning code. Additionally, the 2020–2045 RTP/SCS is prepared, in part, based on data from cities and counties related to their respective general plans, land uses, and expected

demographic growth. The Project would redevelop an underutilized site with transit and pedestrian accessibility with multi-story buildings that provide complementary commercial, assisted living, and medical office uses (or the Project with Building A Residential/Commercial that provide complementary commercial, assisted living, and residential uses) while integrating two historic structures. (Draft EIR, p. 3.6-13 and p. 3.6-22)

The City's General Plan includes goals and policies that have the purpose of avoiding or mitigating an environmental effect; for the City of Pasadena, these include historic resources and GHG emissions/sustainability. (Draft EIR, p. 3.6-10 and p. 3.6-19)

Consistent with Goal 8 and Policy 8.1, 8.4, and 8.5 of the General Plan, a historic resources variance is being sought by the Applicant to preserve and adaptively reuse two previously recorded historic structures on the site (501 and 523 South Arroyo Parkway). Specifically, the Applicant is requesting an increase in allowable building height to offset the reduction in developable area due to preserving the two historic structures. This variance is being considered consistent with the General Plan as well as the City's historic preservation program, which promotes the identification, evaluation, rehabilitation, adaptive use, and restoration of historic structures. Additionally, mitigation measures have been identified to protect the on-site historic structures during construction activities and ensure there are no significant impacts to historic resources, consistent with the General Plan. (Draft EIR, p. 3.6-13 and 3.6-19 through -20)

Consistent with Goal 10 and Policy 10.1, 10.4, and 10.6 of the General Plan, as concluded in Section 3.4, GHG Emissions, of the Draft EIR, the Project and Project with Building A Residential/Commercial would be consistent with the City's Climate Action Plan (CAP), SCAG's 2020–2045 RTP/SCS *Connect SoCal*, the California Air Resources Board (CARB), California's Climate Change Scoping Plan (Scoping Plan), and Statewide GHG reduction goals for 2030 or 2050 identified in Executive Order (EO) S-3-05 and Senate Bill (SB) 32. As concluded in Section 3.3, Energy, of the Draft EIR, construction and operation of the Project and Project with Building A Residential/Commercial would not result in wasteful, inefficient, or unnecessary use of energy resources, nor conflict with or obstruct the applicable State or local plans for renewable energy and energy efficiency. Based on these analyses, it can be concluded that the Project would not conflict with applicable goals and policies related to GHG emissions and sustainability as it relates to energy efficiency. (Draft EIR, p. 3.6-11 and 3.6-20)

The City's General Plan land use designation for the site is High Mixed-Use, which allows maximum densities of 3.0 floor area ratio (FAR) and 87 dwelling units per acre (du/acre). Based on the site area (144,853 sf), the site would allow up to 434,559 sf of floor area and up to 289 dwelling units. Development of the Project would result in a total of 417,929[1] sf of floor area (aboveground), which would include up to 95 senior housing units. Development of the Project with Building A Residential/Commercial would also result in a total of 417,929 sf of floor area (aboveground) but would include 289 dwelling units balanced between market rate apartments/condominiums in Building A and independent senior living units in Building B. The Project and Project with Building A Residential/Commercial would not require a General Plan amendment. Both the Project and Project with Building A Residential/Commercial were determined to be consistent with the General Plan Land Use Element's Guiding Principles and goals and policies whose purpose is avoiding or mitigating an environmental effect.

The Project and Project with Building A Residential/Commercial would establish a PD zoning district (via a Zone Change from CD-6 to PD-39) for the site and would require adoption of a PD

[1] Of this, a total of 338,376 sf would be new development in Buildings A and B.

Plan. The regulations and standards that dictate allowed and conditionally allowed land uses and development would be prescribed in the accompanying PD Plan. The basic design of a project, including compatibility with surroundings, massing, proportion, siting, solid-to-void relationships, and compliance with applicable design guidelines is evaluated through the City's Design Review process and is a role for the City's Design Commission. A subsequent review of a proposed PD zone and PD Plan would occur at a public hearing by the Planning Commission. Therefore, with adherence to the PD Plan processes, including consideration of a variance for historic resources to increase the height of the proposed buildings, the Project would be considered consistent with the zoning code. The Project and Project with Building A Residential/Commercial would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. There would be less than significant impacts, and no mitigation is required. (Draft EIR, p. 3.6-6 through 3.6-24)

Cumulative Impacts

Project and Project with Building A Residential/Commercial

The cumulative impacts related to demographic growth are analyzed for the City of Pasadena. Growth and development in the City would be accompanied by potential changes in existing land uses. All future projects requiring General Plan amendments or zone changes/variances would need to show consistency with the applicable goals, policies, and/or actions in the General Plan and/or Zoning Code, respectively, and thus are not expected to lead to land use incompatibilities or conflicts. Planned or required infrastructure and public facilities associated with individual projects would provide the necessary facilities and services to existing and future developments. Thus, these projects would complement the private development projects planned in the City. The Project and Project with Building A Residential/Commercial would not result in a cumulatively considerable impacts, and no mitigation is required. (Draft EIR, p. 3.6-25)

3.7 NOISE (SECTION 3.7 OF THE EIR)

Potential Impacts Evaluated

- Would the project result in the generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies? (Draft EIR, p. 3.7-11)

Proposed Mitigation

None required.

Findings Pursuant to Section 15091 of the State CEQA Guidelines

As noted above and explained below, the Draft EIR analysis determined that implementation of both the Project and Project with Building A Residential/Commercial would not result in significant impacts related to noise. As such, findings under Section 15091 of the State CEQA Guidelines are not warranted.

Supporting Explanation

Project and Project with Building A Residential/Commercial

Construction of the Project and Project with Building A Residential/Commercial would generate noise from demolition, site preparation, grading/excavation, building construction and architectural coating activities. Noise levels for the Project's construction phase would be based on a typical construction equipment mix for a mixed-use project and do not include use of atypical, very loud, and vibration-intensive equipment (e.g., pile drivers). The Draft EIR determined that noise levels from construction activities at the nearest noise sensitive use/receptor would be less than the City's noise limit of 85 dBA as measured at 100 feet, and would be lower than 85 dBA for almost all receptors and/or all construction phases (refer to Table 3.7-4 page 3.7-12 of the Draft EIR). Noise from construction activities on-site would be clearly audible above the existing ambient noise environment. However, construction would occur during the least noise-sensitive portions of the day, and it would not exceed the City's construction noise limit of 85 dBA at 100 feet. Additionally, off-site noise from the addition of construction-related truck trips would not be discernable.

Operation of the Project and Project with Building A Residential/Commercial would increase traffic compared to the existing uses on the site, which has the potential to increase noise levels on local roadways proximate to the site. The Project would result in a greater increase in net average daily trips (ADT) than the Project with Building A Residential/Commercial and would result between 0 percent and 19 percent increase in ADT (refer to Table 3.7-6 on page 3.7-14 of the Draft EIR). A 3-decibel increase occurs when traffic volumes double or a project increases the percentage of noisy trucks on roadways. With a maximum increase of 19 percent, the increase in off-site traffic-related noise would be less than 1 decibel. This increment is not discernable to human hearing even under laboratory conditions. On-site operational noise sources associated with the Project would include, but not limited to, mechanical equipment (e.g., HVAC units), landscape maintenance equipment, and noise generated by outdoor open spaces and dining. The Project would be required to comply with City of Pasadena noise ordinances Sections 9.36.090 and 9.36.050. In summary, construction and operation of the Project and Project with Building A Residential/Commercial would not result in a substantial temporary or permanent change in ambient noise levels. There would be less than significant impacts, and no mitigation is required. (Draft EIR, p. 3.7-10 through 3.7-16)

Cumulative Impacts

Project and Project with Building A Residential/Commercial

Noise generated during construction of the Project and Project with Building A Residential/Commercial would be localized and would occur intermittently for varying periods of time throughout the construction period. Noise generated by construction of the Project or Project with Building A Residential/Commercial in combination with another project with major construction activity within approximately 1,000 feet of the site could adversely impact sensitive receptors in the vicinity of the site with a cumulative noise level greater than the noise generated solely at the Project site. At the time of preparation of the Draft EIR, there were no projects within 1,000 feet that were anticipated to be constructed concurrently with the Project or Project with Building A Residential/Commercial that would have the potential to generate cumulatively considerable noise or vibration levels. The City also limits noise from construction equipment to 85 dBA at 100 feet. Because construction noise would be substantially attenuated prior to reaching land uses proximate to the site and imposes a noise limit on construction equipment,

cumulative noise from proximate construction projects, if applicable, would not be substantially different than that generated by the Project or Project with Building A Residential/Commercial.

Cumulative traffic noise was evaluated by the City's General Plan EIR, in which buildout traffic noise levels along Arroyo Parkway north of California Boulevard were found to increase by 0.5 dBA. The Project or Project with Building A Residential/Commercial would not result in increases in cumulative traffic noise above the 5 dBA CNEL significance threshold used in the General Plan EIR. Individual stationary sources of noise are regulated by the City's Municipal Code for both the Project and the Project with Building A Residential/Commercial as well as any future projects in the vicinity. The stringent noise limitations established for each of these noise sources, the infrequency of occurrence, and the separation distance for these noise sources would limit cumulative noise exposure near the Project site to a less than significant level. As such, construction and operation of the Project or Project with Building A Residential/Commercial would not result in a cumulatively considerable noise impact, and no mitigation is required. (Draft EIR, p. 3.7-19 through 3.7-20)

3.8 PUBLIC SERVICES AND RECREATION (SECTION 3.8 OF THE EIR)

Potential Impacts Evaluated

- Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
    - Fire protection; (Draft EIR, p. 3.8-10)
    - Police protection; (Draft EIR, p. 3.8-11)
    - Schools; (Draft EIR, p. 3.8-12)
    - Parks; or (Draft EIR, p. 3.8-13)
    - Other public facilities? (Draft EIR, p. 3.8-12)
- Would the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? (Draft EIR, p. 3.8-13)
- Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (Draft EIR, p. 3.8-13)

Proposed Mitigation

None required.

Findings Pursuant to Section 15091 of the State CEQA Guidelines

As noted above and explained below, the Draft EIR analysis determined that implementation of both the Project and Project with Building A Residential/Commercial would not result in significant impacts related to public services and recreation. As such, findings under Section 15091 of the State CEQA Guidelines are not warranted.

Supporting Explanation

Project and Project with Building A Residential/Commercial

Fire Protection and Emergency Medical Services

The Pasadena Fire Department (PFD) anticipates that the Project and Project with Building A Residential/Commercial would result in an increased call for fire protection and emergency medical services because there would be larger development on the site than the existing conditions; however, the increase would not result in the need to construct new or expanded facilities whose construction may cause an environmental impact. Further, the Project or Project with Building A Residential would comply with the California Fire Code, regulations related to fire protection, and be subject to the City's routine construction permitting process. This includes a review by PFD for compliance with building and site design standards related to fire life safety and coordinating with Pasadena Water and Power (PWP) to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. The Project and Project with Building A Residential/Commercial would generate revenues towards the City's general fund (e.g., property taxes, sales tax, business tax) that could potentially be applied toward the funding of PFD fire protection and emergency services. There would be less than significant impacts related to the need for new or expanded PFD facilities, and no mitigation is required. (Draft EIR p. 3.8-10 through 3.8-11 and p. 3.8-14 through 3.8-15)

Police Protection Services

The Pasadena Police Department (PPD) anticipates that the Project and Project with Building A Residential/Commercial would result in an increase in calls for service in and around the site, primarily due to traffic (i.e., traffic stops, accidents), potential theft on the premises and in vehicles, and disturbances related to unhoused individuals. PPD states that whenever additional businesses and/or residents move into an area, there is a presumption that calls for service increase. Further, the Project and Project with Building A Residential/Commercial would be reviewed by the PPD and be required to comply with any requirements in effect when the review is conducted. The Project and Project with Building A Residential/Commercial would generate revenues towards the City's general fund (e.g., property taxes, sales tax, business tax) that could potentially be applied toward the funding of PPD police protection services. These revenues would help offset the increased demand for PPD services with buildout of the General Plan. Construction and operation of new or expanded facilities, if necessary, as an allowed land use were evaluated throughout the General Plan EIR. However, the PPD does not indicate the Project and Project with Building A Residential/Commercial would result in the need to construct new or expanded facilities that may cause an environmental impact. There would be less than significant impacts related to the need for new or expanded PPD facilities, and no mitigation is required. (Draft EIR, p. 3.8-11 and p. 3.8-15)

Schools

The Project would not generate school-age children that would utilize Pasadena Unified School District (PUSD) schools or programs, as the only dwelling units proposed are for senior-age persons. As allowed under the SB 50, school districts serving the City can assess school impact fees based on the floor area of new dwelling units and non-residential developments. The Project with Building A Residential/Commercial would generate school-age children and would be required to remit SB 50 fees. These fees, to be remitted prior to issuance of building permits, are used to fund school services and facilities needed to provide the necessary school services. There would be no impact associated with the Project and a less than significant impact associated with

the Project with Building A Residential/Commercial, and no mitigation is required. (Draft EIR, p. 3.8-12)

Other Public Facilities (Libraries)

While the Project and Project with Building A Residential/Commercial would result in an increase in the population being served by the Pasadena Public Library (PPL), their total collection exceeded national per capita standards at the time the General Plan EIR was prepared. As such, the PPL concluded that the Project's and Project with Building A Residential/Commercial's population would be adequately served by the existing facilities and related collections and would not result in the need to construct new or expanded PPL facilities that may cause an environmental impact. There would be a less than significant impact, and no mitigation is required. (Draft EIR, p. 3.8-12)

Parks and Recreation Services

The City's Parks, Recreation, and Community Services Department does not have a minimum service ratio for parks. However, based on the existing parkland with a 0.7-mile radius of the site and proposed private and public open space proposed as part of the Project and Project with Building A Residential/Commercial, the Parks, Recreation, and Community Services Department concluded that the increase in population associated with the Project and Project with Building A Residential/Commercial would not result in the need for new or expanded off-site park facilities that may cause an environmental impact. Additionally, the Parks, Recreation, and Community Services Department concluded that the Project or Project with Building A Residential/Commercial would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated through payment of a park impact fee (Section 4.17 of the Pasadena Municipal Code [PMC]) whose purpose is to offset increased demand for parks and impact on existing parks. There would be a less than significant impact, and no mitigation is required. (Draft EIR, p. 3.8-13 through 3.8-14)

Cumulative Impacts

Project and Project with Building A Residential/Commercial

For PFD, PPD, PPL, and parks services, the service area for consideration of cumulative impacts is the City. For PUSD, the geographic area for consideration of cumulative impacts is the PUSD service area, which includes the City and some adjacent areas. The PFD and PPD have mutual aid agreements with other fire protection and police agencies in the surrounding region. Individual developments in the City would be reviewed by the PFD and PPD and required to comply with any requirements in effect when the review is conducted. Future development in the City would generate revenues towards the City's general fund (e.g., property taxes, sales tax, business tax) that could potentially be applied toward the funding of PFD and PPD facilities. These revenues would help offset the increased demand for PFD and PPD services with buildout of the General Plan. Construction and operation of new or expanded facilities, if necessary, as an allowed land use were evaluated throughout the General Plan EIR.

The General Plan EIR states that the existing library system (in 2015) and PUSD would have adequate resources to serve the anticipated population increase, including student population, with General Plan buildout. PUSD determined that there would be excess classroom capacity for all grade levels. Individual developments in the City would be required to pay SB 50 fees as appropriate at the time that project is implemented. Additionally, PUSD can utilize Measure TT

funds. As discussed in the Initial Study, the development of the Project or the Project with Building A Residential/Commercial would be within the remaining development capacity of the General Plan for the CDSP.

Individual developments in the City would be required to pay the residential impact fee consistent with the park impact fee nexus study prepared in 2013 and updated every five years. Compliance with the residential impact fee program ensures that there is adequate parkland based on General Plan standards, and that there would not be substantial deterioration of existing facilities. In addition to City of Pasadena, the surrounding cities, County of Los Angeles, and National Forest Service have policies and programs to maintain and/or develop regional recreation facilities to meet increased demand. It is not expected that there would be regional growth, without some parallel growth of recreation facilities, such that the existing facilities would experience substantial physical deterioration.

Therefore, the Project and Project with Building A Residential/Commercial would not result in a cumulatively considerable impact to fire protection and emergency medical services, police protection, schools, libraries, and parks and recreation facilities, and no mitigation is required. (Draft EIR, p. 3.8-14 through p. 3.8-16)

3.9 TRANSPORTATION (SECTION 3.9 OF THE EIR)

Potential Impacts Evaluated

- Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (Draft EIR, p. 3.9-9)
- Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1)? (Draft EIR, p. 3.9-9)
- Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Draft EIR, p. 3.9-11)
- Would the project result in inadequate emergency access? (Draft EIR, p. 3.9-12)

Proposed Mitigation

None required.

Findings Pursuant to Section 15091 of the State CEQA Guidelines

As noted above and explained below, the Draft EIR analysis determined that implementation of both the Project and Project with Building A Residential/Commercial would not result in significant impacts related to transportation. As such, findings under Section 15091 of the State CEQA Guidelines are not warranted.

Supporting Explanation

Project and Project with Building A Residential/Commercial

The City of Pasadena *Transportation Impact Analysis Current Practice and Guidelines* (TIA Guidelines) address two vehicular performance metrics: Vehicle Miles Traveled (VMT) per Capita and Vehicle Trips (VT) per Capita. The City's TIA methodology assesses both the vehicular and

non-vehicular (i.e., transit, bicycle, pedestrian) transportation facilities together with a total of five transportation performance measures (see Table 3.9-4 on page 3.9-7 of the Draft EIR). Proposed projects are analyzed using the City's calibrated travel demand forecasting (TDF) model built on SCAG's regional model.

Compared to the Project, the Project with Building A Residential/Commercial would have substantively lower VMT per Capita and somewhat lower VT per Capita. The Pasadena Department of Transportation (DOT) determined that neither the Project nor Project with Building A Residential/Commercial would exceed any of the CEQA transportation thresholds defined in the City's TIA Guidelines. As such, the Project and Project with Building A Residential/Commercial would not conflict with the City's plan addressing the circulation system under CEQA (i.e., TIA Guidelines), which includes transit, roadway, bicycle and pedestrian facilities; or conflict or be inconsistent with Section 15064.3(b)(1) of the State CEQA Guidelines.

The Pasadena DOT was consulted regarding the collision history for the South Arroyo Parkway and California Boulevard intersection. While collisions have occurred at this intersection, it is not considered a high collision location, and Pasadena DOT continues to monitor operations at this intersection and along the corridor to address traffic signal operations and reduce the potential for collisions. The Pasadena DOT concluded that the additional trips generated by the Project, on its own, are not expected to generate a safety concern at this intersection. Moreover, the Project would not increase hazards due to a geometric design feature or incompatible use. No sharp curves or dangerous intersections are proposed, and the proposed uses are consistent and compatible with the existing uses onsite and in the vicinity. Implementation of the Project or Project with Building A Residential/Commercial would not create new obstructions to emergency access in the Project area. There would be a less than significant impacts, and no mitigation is required. (Draft EIR, p. 3.9-9 through 3.9-12)

Cumulative Impacts

Project and Project with Building A Residential/Commercial

Cumulative transportation impacts within the City were recently evaluated in the City's General Plan EIR, which evaluated transportation impacts within the City associated with buildout of the General Plan in 2035. The General Plan EIR analysis considered impacts associated with the five transportation performance measures identified in the TIA Guidelines. The analysis found that transportation impacts associated with all five performance measures from buildout of the General Plan would be less than significant. As the Project and Project with Building A Residential/Commercial are consistent with the land use designation associated with the site that was evaluated in the General Plan EIR, the analysis of transportation impacts in the General Plan EIR is representative of cumulative impacts associated with the Project and Project with Building A Residential/Commercial. Also, as discussed above, the Project and Project with Building A Residential/Commercial would result in less than significant impacts for all five transportation performance measures. The Project and Project with Building A Residential/Commercial would not result in a cumulatively considerable impact related to transportation, and no mitigation is required. (Draft EIR, p. 3.9-13)

3.10 TRIBAL CULTURAL RESOURCES (SECTION 3.10 OF THE EIR)

Potential Impacts Evaluated

- Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). (Draft EIR, p. 3.10-3)

Proposed Mitigation

None required.

Findings Pursuant to Section 15091 of the State CEQA Guidelines

As noted above and explained below, the Draft EIR analysis determined that implementation of both the Project and Project with Building A Residential/Commercial would not result in significant impacts related to tribal cultural resources. As such, findings under Section 15091 of the State CEQA Guidelines are not warranted.

Supporting Explanation

Project and Project with Building A Residential/Commercial

Based the results on an archaeological records search conducted by the South Central Coastal Information Center (SCCIC) on July 24, 2020 and Native American Heritage Commission (NAHC) Sacred Lands File search received on July 15, 2020, there are no tribal cultural resources listed on the California Register of Historical Resources (CRHR) or a local register within the Project site or otherwise known to the culturally affiliated Native American tribes. There would be no impact related to documented tribal cultural resources, and no mitigation is required. (Draft EIR, p. 3.10-3 through 3.10-4).

Cumulative Impacts

Project and Project with Building A Residential/Commercial

Direct impacts to cultural resources are generally site specific. However, development throughout the City could potentially result in the disturbance of prehistoric archaeological resource sites (including tribal cultural resources/Native American remains). Because there are no documented tribal cultural resources on the Project site, the Project and Project with Building A Residential/Commercial would not result in a cumulatively considerable impact to tribal cultural resources, and no mitigation is required. (Draft EIR, p. 3.10-5 through 3.10-6)

3.11 UTILITIES AND SERVICE SYSTEMS (SECTION 3.11 OF THE EIR)

Potential Impacts Evaluated

- Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment facilities or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects? (Draft EIR, p. 3.11-13)
- Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Draft EIR, p. 3.11-13)
- Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (Draft EIR, p. 3.11-15)
- Would the project generate solid waste in excess of State or local standards, in in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste goals? (Draft EIR, p. 3.11-24)
- Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (Draft EIR, p. 3.11-26)

Proposed Mitigation

None required.

Findings Pursuant to Section 15091 of the State CEQA Guidelines

As noted above and explained below, the Draft EIR analysis determined that implementation of both the Project and Project with Building A Residential/Commercial would not result in significant impacts related to utilities and service systems. As such, findings under Section 15091 of the State CEQA Guidelines are not warranted.

Supporting Explanation

Project and Project with Building A Residential/Commercial

Water Supply and Infrastructure

Pasadena Water and Power (PWP) provides potable water to City residents and businesses. The water supply analysis was derived from the *Affinity Project Water Supply Assessment* (WSA), prepared for the Project and Project with Building A Residential/Commercial by ESA and dated January 2022 (provided as Appendix I of the Draft EIR). It is noted that the Project and Project with Building A Residential/Commercial do not qualify as a "project" under Senate Bill (SB) 610, which requires preparation of a WSA (Section 10912[a] of the Water Code). Nonetheless, based on comments received on the Notice of Preparation of this Draft EIR and given that all of California's 58 counties are under a drought emergency proclamation as of the preparation of the Draft EIR, a WSA was prepared for the Project and Project with Building A Residential/Commercial to inform the environmental analysis.

Construction activities would use approximately 4.61 million gallons (MG) or 14.1 acre-feet (af) of water for dust control purposes during demolition, excavation, grading activities, equipment

cleaning, vehicle wash downs, washout basins, and re-compaction of backfill materials, concrete pouring, and other uses. Once operational, in all water year types, including single-dry and multiple-dry years, it is anticipated that the worst case (conservative estimate) net demand of approximately 76 acre feet per year (afy) for the Project and net demand of approximately 68 afy for the Project with Building A Residential/Commercial would remain unchanged, unless consumers within the City's service area are specifically asked to reduce water use through active conservation measures (refer to Tables 3.11-8 and 3.11-13 on pages 3.11-18 and 3.11-24). The water demand estimates include all indoor uses and landscape irrigation in all water year types.

In normal years, an annual water demand of 76 afy represents about 0.24 percent of the City's anticipated total system supply of 31,078 afy in 2025, 0.24 percent of the supply of 31,537 afy in 2040, and 0.24 percent of the supply of 31,409 afy in 2045. An annual water demand of 68 afy represents 0.22 percent of the City's anticipated total system supply of 31,078 afy in 2025, 0.22 percent of the supply of 31,537 afy in 2040, and 0.22 percent of the supply of 31,409 afy in 2045. The water demand for the Project with Building A Residential/Commercial scenario is approximately 8 afy lower than for the Project. The 2020 Urban Water Management Plan (UWMP) aligns with Pasadena's population and land use and is consistent with SCAG population and employment projections; and thereby includes potential water demands that would be generated by land use changes and new commercial and residential developments like the Project and Project with Building A Residential/Commercial. Additionally, PWP staff reviewed the WSA and concluded that the WSA meets the requirements of SB 610 and SB 221 and concurred that PWP would have sufficient water supplies to meet existing demands combined with the estimated demands of up to 76 afy and cumulative demands anticipated in the 2020 UWMP. Therefore, there would be sufficient water supplies available to serve the Project or Project with Building A Residential/Commercial and reasonably foreseeable future development during normal, dry, and multiple dry years.

The Project would include installation of new potable and fire water connections to the existing PWP water lines. As discussed in the Draft EIR, all connections to wet and dry utilities would occur to the east on South Arroyo Parkway. The proposed water infrastructure would be constructed within the site, as defined in Section 2.0 and the potential for construction-related impacts are analyzed throughout the Draft EIR, including short-term air quality (Section 3.1) and noise (Section 3.7). There would be a less than significant impacts related to water supply or infrastructure, and no mitigation is required. (Draft EIR, p. 3.11-13 through 3.11-24)

Wastewater Conveyance and Treatment

The Project or Project with Building A Residential/Commercial would tie into the existing 8-inch diameter City of Pasadena sewer line within the eastern portion of Arroyo Parkway and would flow east at the connection with the 8-inch-diameter line in California Boulevard. Wastewater flow in the City's local sewer lines serving the site discharge to either or both the Los Angeles County Sanitation Districts' (LACSD's) 21-inch-diameter Arroyo Seco Section 4 Trunk Sewer or 16-inch-diameter Arroyo Seco Section 5 Trunk Sewer. LACSD indicates that wastewater would be conveyed and treated at either the Whittier Narrows Water Reclamation Plant (WRP), which has a remaining capacity of 5.1 mgd, or the Los Coyotes Whittier Narrows WRP, which has a remaining capacity of 16.2 mgd. The LACSD estimates a total of 92,642 gallons per day (gpd) of wastewater generation, not including Whole Foods Market, from the Project or Project with Building A Residential/Commercial. Based on the estimated wastewater generation from existing uses on-site (not including Whole Foods Market) of 15,798 gpd of wastewater, the Project or Project with Building A Residential/Commercial would result in a net wastewater generation of approximately 76,844 gpd (0.076 million gallons a day [mgd]). Wastewater flows of approximately 0.076 mgd represent 0.1 percent of the Arroyo Seco Section 4 Trunk Sewer, 1.8 percent of the

Arroyo Seco Section 5 Trunk Sewer, 1.5 percent of the Whittier Narrows WRP, and 0.5 percent of the Los Coyotes WRP remaining capacity. Sewer line capacity is part of the City's standard plan check/project approval process. No relocation or construction of new or expanded City-owned sewer lines has been determined necessary with Project implementation. There would be less than significant impacts related to wastewater conveyance and treatment, and no mitigation is required. (Draft EIR, p. 3.11-13 through 3.11-15)

Dry Utilities (Electrical, Natural Gas, and Telecommunications)

The Project or Project with Building A Residential/Commercial would tie into existing underground electric and telecommunications lines located in the sidewalk on the west side of South Arroyo Parkway (adjacent to the site) and the existing natural gas line located along the east side of Arroyo Parkway. There are four existing natural gas meters within the eastern portion of the site; the Project or Project with Building A Residential/Commercial proposes to tie in and reuse these gas meters and associated laterals crossing under Arroyo Parkway.

Electric and natural gas services are regulated by the California Public Utilities Commission (CPUC), which requires that these utilities provide services as required by the public. Telecommunications services are provided on demand in a free market system. The need for new, expanded, and/or relocated dry utilities would be determined as part of future individual projects and dependent on the conditions at each project site. There would be less than significant impacts related to the relocation or construction of dry utility infrastructure to serve the Project or Project with Building A Residential/Commercial, and no mitigation is required. (Draft EIR, p. 3.11-14 and 3.11-15)

Solid Waste

Solid waste would be collected by a private hauler and may be transported to any landfill in the State with capacity that can accept the municipal waste. The primary location that accepts City waste is Scholl Canyon Landfill. Construction of the Project or Project with Building A Residential/Commercial is conservatively estimated to generate approximately 1,125 cy of waste requiring landfill disposal after implementation of a 75 percent waste diversion pursuant to the City's Construction and Demolition Recycling Ordinance.

The one-time disposal of approximately 1,125 cy would represent approximately 0.07 percent of Scholl Canyon Landfill's remaining permitted capacity. Implementation of the Project was estimated to generate approximately 2,175 tons per year (approximately 5.96 tons per day) of solid waste requiring disposal after diversion or approximately 0.06 percent of Scholl Canyon Landfill's remaining permitted capacity. The Project with Building A Residential/Commercial was estimated to generate approximately 1,433 tons per year (approximately 3.9 tons per day) of solid waste requiring disposal after diversion; this is slightly less daily solid waste generation than the Project and would represent approximately 0.04 percent of Scholl Canyon Landfill's remaining permitted capacity.

The City implements the California Integrated Waste Management Act through Section 8.61 of the PMC, which establishes the City's "Solid Waste Collection Franchise System". The Project and Project with Building A Residential Commercial would be required to comply with the applicable solid waste franchise's recycling system and would therefore meet local and State solid waste diversion regulations. In addition, the Project and Project with Building A Residential Commercial would be required to comply with the City's Construction and Demolition Ordinance that requires diversion of at least 75 percent of the construction waste stream from landfill disposal

(Section 8.62 of the PMC). There would be less than significant impacts related to solid waste, and no mitigation is required. (Draft EIR, p. 3.11-24 through 3.11-26)

Cumulative Impacts

Project and Project with Building A Residential/Commercial

Water

As the Project and Project with Building A Residential/Commercial are consistent with the Project's land use designation in the General Plan as part of planned growth within the City's Central District, potential demand for the Project was considered as part of the PWP 2020 UWMP. Therefore, the WSA finds that the Metropolitan Water District (MWD), as the wholesale potable water supplier has sufficient water supplies available to serve its member agencies, including PWP, now and over a 20-year planning horizon. In addition, PWP's groundwater, including its annual groundwater credits stored in the RB, are reliable in all water year types. With that understanding, the WSA concludes that PWP has sufficient water supplies in all water year types provided through MWD and supplemented with local groundwater to meet existing demands combined with the Project demands and cumulative demands through the 20-year planning horizon of the PWP 2020 UWMP. Therefore, the Project or Project with Building A Residential/Commercial would not result in a cumulatively considerable impact related to water supplies, and no mitigation is required. (Draft EIR, p. 3.11-26 and 3.11-27)

Wastewater

For wastewater conveyance and treatment services, the geographic area for consideration of cumulative impacts is the City of Pasadena (for locally owned sewer lines) and the LACSD service area (for regional facilities). The City manages its wastewater infrastructure through the Sewer Master Plan, prepared by the City's Department of Public Works and based on forecasts of wastewater flows with buildout of the General Plan. Individual development projects in the City would be required to remit the appropriate sewer facility charge consistent with Chapter 4.53 of the PMC, which ensures that new development pays its estimated cost for any capacity upgrades to the City sewer system. Also, as discussed in the Initial Study, the Project and Project with Building A Residential/Commercial would be within the remaining development capacity of the General Plan for the Central District Specific Plan. Regarding LACSD facilities, as discussed above, the Project and Project with Building A Residential/Commercial would represent a nominal incremental contribution to regional wastewater flows requiring conveyance to and treatment at the LACSD's WRPs. All future development projects in the LACSD's service area would be subject to the LACSD's Wastewater Ordinance, which includes the Connection Fee program. The Project or Project with Building A Residential/Commercial would not result in a cumulatively considerable impact to wastewater conveyance or treatment facilities, and no mitigation is required. (Draft EIR, p. 3.11-27 and 3.11-26)

Dry Utilities

Because electricity, natural gas, and telecommunications are provided on demand, including CPUC-regulated utilities, the expansion of services based on regional growth is part of each provider's business strategy. Therefore, growth and development in the City is not expected to result in adverse impacts on dry utilities. The Project or Project with Building A Residential/Commercial would not contribute to a cumulatively considerable impact related to the need for new or expanded dry utilities, and no mitigation is required. (Draft EIR, p. 3.11-27 and 3.11-26)

Solid Waste

Solid waste collection services are provided on demand by private haulers and cumulative impacts on their services from future development in the City are not expected to result in adverse impacts on solid waste collection services. Available landfill capacity is expected to decrease over time with future growth and development in the City; however, waste reduction and recycling programs and regulations are expected to reduce this demand and extend the life of existing landfills. CalRecycle is responsible for administering and monitoring State solid waste reduction initiatives, and individual jurisdiction's ability to meet these requirements. It is assumed that CalRecycle's role would continue into the future. Based on the available capacity of landfills in the region and the Project's nominal contribution of additional solid waste requiring disposal–approximately 0.06 percent of Scholl Canyon Landfill's remaining daily permitted capacity, as a conservative analysis–the Project would not contribute to a cumulatively considerable impact to landfill capacity or solid waste regulations, and no mitigation is required. While the Project with Building A Residential/Commercial would result in slightly less solid waste generation, this would not result in a difference in the cumulative impact finding for this scenario. (Draft EIR, p. 3.11-27 and 3.11-26)

SECTION 4.0 FINDINGS REGARDING IMPACTS MITIGATED TO BELOW A LEVEL OF SIGNIFICANCE

The City Council finds that mitigation measures have been identified in the Final EIR that will reduce the following potentially significant environmental impacts to below a level of significance. For each environmental topic within this category, the discussion below includes: (1) a listing of the potential impacts evaluated in the EIR related to that topic and the Draft EIR page citations where the relevant discussion begins, (2) presentation of the mitigation measure(s) (MM[s]) identified in the EIR for that topic, (3) findings pursuant to Section 15091 of the State CEQA Guidelines for that topic, and (4) explanation of the substantial evidence in support of the EIR conclusion that the impact would be reduced to a less than significant level with implementation of identified MM(s).

4.1 CULTURAL AND PALEONTOLOGICAL RESOURCES (SECTION 3.2 OF THE EIR)

Potential Impacts Evaluated

- Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5? (Draft EIR, p. 3.2-12)
- Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5? (Draft EIR, p. 3.2-14)

Proposed Mitigation

MM CUL-1 To the satisfaction of the City, the Project Applicant shall engage with a licensed architect and/or engineer that meets the Secretary of the Interior's (SOI) Professional Qualifications Standards for historic architect to develop a series of protection interventions and protocols that will preserve the two historical resources on the Project site – 501 and 523 South Arroyo Parkway – during all construction activities in, on, and near these two buildings. These measures shall take into consideration the protection of and security of both resources, particularly the preservation of the character-defining features through the installation of physical protective barriers around each resource and the creation of site protocols that will eliminate the potential for physical damage resulting from impacts with construction and transport equipment.

To ensure the protection of these resources and their character-defining features, all protective barriers (which shall be installed prior to the initiation of any construction activity) and protocols shall be compliant with the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (Weeks and Grimmer 1995) (Standards) and be subject to review and approval by the City planning staff.

Site protocols for protecting the historical resources shall outline issues related to site access and navigation by contractors and construction personnel to reduce the potential for any inadvertent accidents between equipment and the two on-site historical resources. Additionally, a series of emergency measures shall be developed that outlined specific step-by-step processes in the event that an

accident involves one of the historical resources. This will likely include the following:

1) Stop-work protocols after an accident involving a historical resource occurs,
2) Notification procedures and identification key contacts,
3) Identification of qualified historic preservation professionals to investigate the historical resources following the determination that the area is safe,
4) Thorough conditions assessment of the resource by the qualified consultant to ascertain the level and extent of the damage, and
5) Preparation of a historical resource treatment plan to stabilize the historical resource and address the damage, which will be submitted to City staff for review and approval prior to completing the work and resumption of construction activities.

Additionally, protocols shall include regular on-site monitoring during construction activities by historic preservation consultant, either a SOI Qualified historic architect or architectural historian. The historic preservation consultant shall document the existing conditions of each resource prior to the initiation of any construction activity and prior to installation of the protective barriers and implementation of the protection protocols. This documentation phase will include high resolution digital photographs of each facade, as well as details of character-defining features for each resource. During construction, the historic preservation consultant shall prepare field report memoranda to the City confirming that the Standards compliant protection barriers are installed in accordance with the Standards, and that agreed upon protocols are being followed throughout the course of the Project. These memoranda will be submitted to City staff for their records and review. A final report outlining the conditions of the historical resources prior, during, and following the Project's construction shall be issued to the City for approval following construction activities and prior to the issuance of a Certificate of Occupancy.

MM CUL-2 If cultural resources are discovered during construction of land development projects in Pasadena that may be eligible for listing in the California Register for Historic Resources, all ground disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report including site record to the City and the South-Central Coastal Information Center at California State University Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report.

Findings Pursuant to Section 15091 of the State CEQA Guidelines

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR (Section 15091[a][1] of the State CEQA Guidelines).

Supporting Explanation

Project and Project with Building A Residential/Commercial

As determined in the Historic Resources Assessment prepared for the Project and Project with Building A Residential/Commercial, the Project site contains two historic resources: the buildings at 501 and 523 South Arroyo Parkway. The buildings at 491, 495, 499, 503, and 541 South Arroyo Parkway were determined not to be individually eligible for inclusion in the California Register of Historical Resources (CRHR) or the Local Register. Collectively, the buildings located at 491, 495, 499, 501, 503, 523, and 541 South Arroyo Parkway (referred to herein as the South Arroyo Parkway Industrial District) were determined to not be locally eligible for the CRHR under Criterion A and as a City Landmark District. The assessment by PaleoWest found that the South Arroyo Parkway Industrial District does not retain sufficient integrity to convey its historical significance. The buildings have been modified over time to accommodate their current use as commercial buildings. These modifications have led to a loss of historic material and have fundamentally changed the use and design of the buildings. Buildings that were constructed during the period of significance of the potential district, have been substantially altered over time, fragmenting the association of the extant buildings with their interrelated historical use, and compromising the integrity of setting, feeling, and association. (Draft EIR, p. 3-12-12)

The Project or Project with Building A Residential/Commercial would not involve the demolition or other physical destruction of the buildings at 501 and 523 South Arroyo Parkway, nor would it result in any significant internal or external physical modifications that would compromise the historic integrity of the buildings. The Project or Project with Building A Residential/Commercial would change the setting of the buildings at 501 and 523 South Arroyo Parkway, but those changes would not physically alter the buildings and are not substantial enough to compromise the overall historic integrity or obstruct the view of the buildings from the public right-of-way. The surrounding area has been modified over time by new construction and modifications to existing buildings, including the construction of multi-story buildings, which has resulted in the disruption of the historical setting. Therefore, the Project or Project with Building A Residential/Commercial would not result in a substantive adverse change to the historic integrity of the buildings at 501 and 523 South Arroyo Parkway. However, potential for future internal and external modifications to the buildings does exist in the form of tenant improvements. The City's existing design review process, established in Zoning Code Section 17.61.030, requires a finding of consistency with the SOI's Standards to approve any proposed exterior changes to historical buildings within the Central District. Therefore, to ensure any alterations to the buildings are appropriate, MM CUL-1 requires that the Project Applicant engage with a licensed architect and/or engineer that meets the SOI's Professional Qualifications Standards to develop a series of protection interventions and protocols that would preserve the two historical resources on the Project site – 501 and 523 South Arroyo Parkway – during construction activities. These protocols shall take into consideration the protection of and security of both resources, particularly the preservation of the character-defining features through the installation of physical protective barriers around each resource and the creation of site protocols that will eliminate the potential for physical damage resulting from impacts associated with construction and transport of equipment.

The potential for vibration to cause damage to the buildings at 501 and 523 South Arroyo Parkway was addressed, and it was determined there is potential for some construction equipment that would be used on the site to cause cosmetic damage to these buildings because of vibration. As addressed in Section 3.7, Noise, of the Draft EIR, implementation of MM NOI-1, which outlines setbacks for operation of vibration-causing construction equipment, would reduce the potential for cosmetic damage to these two buildings to a less than significant level. This is discussed

further below in Section 4.2 of this document. With implementation of MM CUL-1 and NOI-1, there would be less than significant impacts related to historic resources.

In addition, while there are no known archaeological resources within the Project site nor within ½-mile of the Project site, there is always potential to encounter previously unidentified archaeological resources during excavation in native sediments. The Project with Building A Residential/Commercial would have one less level of subterranean parking spanning both proposed buildings than the Project. However, the possibility of unknown, intact archaeological resources being present in native sediments beneath the Project site remains the same as the Project. Therefore, MM CUL-2 requires attendance by a qualified archaeologist at the pre-grade conference and identifies actions to take if cultural resources (i.e., prehistoric sites, historic sites, and/or isolated artifacts) are discovered. With implementation of MM CUL-2, there would be less than significant impacts related to archaeological resources. (Draft EIR, p. 3.2-12 through 3.2-14)

Cumulative Impacts

Project and Project with Building A Residential/Commercial

Although cultural resources are site-specific regarding any given resource (e.g., resources of important cultural value to Native Americans and the history of California), impacts may be considered cumulative simply because they relate to the loss of cultural resources in general over time throughout the region.

As noted above, the buildings at 501 and 523 South Arroyo Parkway are eligible for the Local Register and eligible for the CRHR under Criterion C; however, the Project or Project with Building A Residential/Commercial would not cause a substantial adverse change in the significance of either resource as defined in Section 15064.5 with implementation of MM CUL-1. Also, implementation of MM NOI-1 would reduce the potential for cosmetic damage to these two buildings, during construction, to a less than significant level. Therefore, the Project or Project with Building A Residential/Commercial would not result in a cumulatively considerable impact to historical resources.

Regarding archaeological resources, implementation of MM CUL-2 would reduce potential impacts to archaeological resources to a less than significant level. The more limited excavation associated with one less level of subterranean parking for the Project with Building A Residential/Commercial would not reduce the possibility of unknown, intact archaeological resources being present in native sediments beneath the site compared to the Project. The City requires implementation of this mitigation where there is potential to encounter unknown cultural resources, as appropriate, thereby avoiding a cumulative contribution to the loss of archaeological resources during development throughout the City pursuant to the General Plan. Therefore, the Project would not result in a cumulatively considerable impact to archaeological resources. (Draft EIR, p. 3.2-15 and 3.2-16)

4.2 NOISE (SECTION 3.7 OF THE DRAFT EIR)

Potential Impacts Evaluated

- Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels? (Draft EIR, 3.7-17)

Proposed Mitigation

MM NOI-1 The potential for vibration-induced cosmetic (i.e., not structural) damage to the structures at 465, 501, and 523 South Arroyo Parkway shall be reduced by implementing the following three steps: (1) setbacks, (2) monitoring, and (3) restoration (if applicable).

(1) The Project Applicant shall be responsible for ensuring the construction specifications include the following language: "Construction equipment shall observe setback distances of 30 feet from any of the three on-site buildings being retained (Whole Foods Market and 501 and 523 South Arroyo Parkway) for equipment equivalent to a large bulldozer (29,000 pounds or more) and 20 feet for jackhammers and loaded trucks. Small dozers and other equipment with vehicle weights of less (29,000 pounds) are not anticipated to result in substantial levels of vibration that could cause building damage".

(2) The Project Applicant shall be responsible for placing a vibration monitor in each of the three on-site buildings to remain on the site. The contractor would need to have vibration measurements taken on the site when heavy equipment or vibration intensive activities occurs near (i.e., less than 30 feet horizontal distance) to these three buildings. Vibration measurements will be recorded and compared to the vibration thresholds appropriate for the building that may be impacted. Vibration records shall be submitted to the City once a week. The appropriate vibration thresholds are as follows: 0.12 peak particle velocity (PPV) for 501 and 523 South Arroyo Parkway and 0.30 PPV for Whole Foods Market. The Applicant shall be responsible for preparing a Monitoring Plan, describing the proposed location of vibration monitors, the timing of monitoring, collecting vibration records (including date, time, activity that precipitated the monitoring, and who recorded the vibration level), to whom and when the monitoring records will be submitted, and any remedial actions needed because of vibration readings. The Monitoring Plan is subject to review and approval by City staff and will be submitted prior to initiation of any construction activity on the site.

If vibration levels are below these thresholds, it is permissible to have construction activity with large (over 29,000 pounds) equipment, jackhammers, and/or loaded trucks within the setback distances included in item 1 above. Additionally, vibration monitoring shall guide construction activity near the perimeter of these buildings during subterranean excavation and construction activity. If vibration levels are found to exceed the applicable threshold, then the associated construction activity shall immediately halt, and alternative methods for achieving the construction activity shall be determined and employed to reduce the construction-generated vibration exposure to the building(s) to less than the thresholds. While the specific alternative methods

to be employed cannot be foreseen, as it would be depending on situation-specific factors, the performance objective of maintaining activity that results in vibration below the applicable thresholds shall guide all decisions.

(3) If cosmetic damage does occur to one or more of these three buildings because of vibration from Project-related construction activities despite setbacks and monitoring, the Project Applicant shall be responsible for restoring the damage. Cosmetic damage includes things like, for example, cracks in paint/plaster, fallen plaster/stucco from a facade, and cracked glass. Specifically, any restorations to Whole Foods Market shall be implemented to return the damaged area to the same condition (e.g., materials, colors, style) as present at the start of construction. Any restorations to the buildings at 501 and 523 South Arroyo Parkway shall conform to the Secretary of the Interior's Standards for the Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Weeks and Grimmer 1995) (Standards), and the determination of whether the planned restorations is consistent with the Standards shall be made by a qualified historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for architectural history or historic architecture (Professional) and to the satisfaction of the City. The restorations to the historic buildings, if necessary, may be either to the conditions present before construction was initiated or, if the planned updates to these buildings are underway may be conducted to meet proposal conditions.

The City of Pasadena Planning & Community Development Department shall be responsible for ensuring these requirements are included in the construction specifications prior to any demolition activity on the site. The Project Applicant and the City's inspector assigned to the Project shall also be responsible for ensuring these measures are consistently implemented throughout the construction period.

Findings Pursuant to Section 15091 of the State CEQA Guidelines

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR (Section 15091[a][1] of the State CEQA Guidelines).

Supporting Explanation

Project and Project with Building A Residential/Commercial

During construction, neither pile driving nor blasting (generally the sources of the most severe vibration) would be used during Project construction. The Project would generate vibration during demolition, grading and excavation, and building construction. Estimated vibration levels when construction activities occur under the closest distance to each receptor would not exceed the vibration annoyance criteria but may exceed the building damage threshold at remaining on-site structures within the Project site (i.e., Whole Foods Market and 501 and 523 South Arroyo Parkway) during nearby construction activity (refer to Table 3.7-9 on page 3.7-18 of the Draft EIR). The only difference in the construction scenario for the Project with Building A Residential/Commercial is that subterranean parking is reduced to four levels (instead of five). However, this would not affect the vibration generation from the excavation activities themselves

because there would be the same daily construction activities. Therefore, MM NOI-1 requires that certain construction activities/equipment be set back from these buildings, that vibration monitoring is implemented, and, if cosmetic damage does occur despite setbacks and monitoring, the Project Applicant shall be responsible for restoring the damage. With implementation of MM NOI-1, there would be less than significant impacts related to vibration causing damage to the three on-site buildings being retained during construction of the Project or Project with Building A Residential/Commercial. (Draft EIR, p. 3.7-17 and 3.7-18)

Cumulative Impacts

Project and Project with Building A Residential/Commercial

Vibration generated during construction of the Project or Project with Building A Residential/Commercial would be localized and would occur intermittently for varying periods of time throughout the construction period. Short-term cumulative vibration generated by construction of the Project or Project with Building A Residential/Commercial could occur with the combination with another project with major construction activity within approximately 1,000 feet of the site. At the time of preparation of the Draft EIR, there were no projects within 1,000 feet that were anticipated to be constructed concurrently with the Project or Project with Building A Residential/Commercial. As such, the Project would not result in a cumulatively considerable construction vibration impact. (Draft EIR, p. 3.7-19 and 3.7-20)

4.3 TRIBAL CULTURAL RESOURCES (SECTION 3.10 OF THE DRAFT EIR)

- Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (Draft EIR, p. 3.10-4)

Proposed Mitigation

MM TCR-1 Prior to the commencement of any ground disturbing activity at the Project site, the Project Applicant shall accommodate a Native American Monitor (Monitor) culturally affiliated with the site as recognized by the Native American Heritage Commission (NAHC). The Monitor contracted and retained shall be at the expense of the tribe(s) that consulted on this Project. The Tribal Monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the Project area. The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified.

The on-site monitoring shall end when all ground-disturbing activities on the Project site are completed, or when the Tribal Representatives and Tribal

Monitor have indicated that all upcoming ground-disturbing activities at the Project Site have little to no potential for impacting Tribal Cultural Resources.

Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by Project construction activities shall be evaluated by the Tribal Monitor approved by the Consulting Tribe and a qualified Archaeologist (if one is present).

If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance in the immediate vicinity of the find shall be halted, and the County Coroner shall be notified per Section 5097.98 of the Public Resources Code and Section 7050.5 of the Health & Safety Code. Human remains and grave/burial goods shall be treated alike per Section 5097.98(d)(1) and (2) of the Public Resources Code. Work may continue in other parts of the Project site while evaluation and, if necessary, mitigation takes place (Section 15064.5[f] of the State CEQA Guidelines). Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin (non-Tribal Cultural Resource) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be donated to a local school or historical society in the area for educational purposes.

Findings Pursuant to Section 15091 of the State CEQA Guidelines

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR (Section 15091[a][1] of the State CEQA Guidelines).

Supporting Explanation

Project and Project with Building A Residential/Commercial

Based on consultation with the Gabrieliño Tongva Tribe and Gabrieliño Band of Mission Indians – Kizh Nation pursuant with AB 52; the results of an archaeological records search conducted by the SCCIC on July 24, 2020; and NAHC Sacred Lands File search received on July 15, 2020, there are no tribal cultural resources listed on the CRHR or a local register within the site or otherwise known to the culturally affiliated Native American tribes. However, there is always the possibility that undiscovered intact cultural resources, including tribal cultural resources, may be present below the surface and encountered during excavation in native sediments. Although the Project with Building A Residential/Commercial would involve slightly less excavation and therefore somewhat less likelihood of encountering an unknown tribal cultural resource, there is

always the possibility that unknown resources may be present. Therefore, MM TCR-1 requires the Project Applicant to accommodate a Native American Monitor culturally affiliated with the site as recognized by the NAHC prior to the commencement of any ground-disturbing activity on the site. MM TCR-1 also defines the role of the Tribal Monitor, if such an individual elects to be present during construction of the Project, and the steps required if a potential tribal cultural resource is encountered during ground-disturbing activities. With implementation of MM TCR-1, there would be a less than significant impact related to tribal cultural resources. (Draft EIR, p. 3.10-4 and 3.10-5)

Cumulative Impacts

Project and Project with Building A Residential/Commercial

The cumulative impacts related to demographic growth are analyzed for the City of Pasadena. Direct impacts to tribal cultural resources are generally site specific. However, development throughout the City could potentially result in the disturbance of prehistoric archaeological resource sites (including tribal cultural resources/Native American remains). The City participates in Native American consultation consistent with AB 52 and SB 18 (when applicable). This process, in combination with site-specific archaeological studies, and any resulting site-specific mitigation measures (typically monitoring and processes to manage any unanticipated resources), would contribute to the reduction of potential tribal cultural resource impacts to the maximum extent feasible. Because there are no documented tribal cultural resources on the site and MM TCR-1 would be implemented, the Project or Project with Building A Residential/Commercial would not result in a cumulatively considerable impact to tribal cultural resources. (Draft EIR, p. 3.10-5 and 3.10-6)

SECTION 5.0 FINDINGS REGARDING ALTERNATIVES

The City Council declares that the City has considered and rejected as infeasible Alternatives 1 through 4 identified in the EIR as set forth herein. In compliance with Section 15126.6(a) of the State CEQA Guidelines, an EIR must describe and evaluate the comparative merits of a reasonable range of alternatives to the project, or to the location of the project, which would (1) feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and (2) may be feasibly accomplished in a successful manner within a reasonable period of time considering the economic, environmental, social, and technological factors involved. Additionally, an EIR need not address alternatives that are infeasible, and the consideration of alternatives is governed by the rule of reason. (Draft EIR, p. 4-1)

The Lead Agency is required to identify the environmentally superior alternative, but it is not required to choose the environmentally superior alternative for approval over the project if the alternative does not provide substantial advantages over the project (i.e., does not avoid or substantially reduce to less than significant impact[s] that would otherwise occur from the project); does not attain most of the project objectives; or is infeasible due to social, economic, technological, or other considerations.

The EIR identified the following objectives for the Project and Project with Building A Residential/Commercial (see Draft EIR, p. 4-2 and 4-3):

1. Reinforce and strengthen Arroyo Parkway as a major commercial corridor and the Central District's economic vitality through the development of multi-story buildings with a variety of complementary commercial and/or residential uses in underutilized areas with higher development capacity.
2. Provide jobs, services, revenues, and opportunities that will support Pasadena as an economically vital city and allow for continued fiscal health.
3. Develop assisted living facilities that have access to local commercial services, health care facilities, community facilities, and public transit.
4. Satisfy local and regional demand for varying levels of care (independent living, residential care, continuing care) to individuals, depending on need, that are transit-accessible and pedestrian-friendly.
5. Improve Pasadena's infrastructure and urban form through modernized buildings that are energy- and water-efficient.
6. Preserve and integrate Pasadena's historic resources as part of a complementary development that reduces the risk of resource demolition, deterioration by neglect, and/or impacts from natural circumstances.
7. Invest sustainably by providing for the needs of existing and future residents and businesses while in proximity to transportation opportunities.

The alternatives analyzed in the EIR represent a reasonable range of alternatives to the Project and Project with Building A Residential/Commercial based on the applicable provisions of CEQA and the State CEQA Guidelines.

5.1 ALTERNATIVES CONSIDERED BUT REJECTED

The following alternatives were considered during the scoping and planning process but were not selected for detailed analysis in the Final EIR, as discussed below.

Alternative Site

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location, which are capable of avoiding or substantially lessening any significant effects of the Project. Only locations that would avoid or substantially lessen any of the significant effects of the Project need be considered for inclusion in the Final EIR (Section 15126.6[f][2][B] of the State CEQA Guidelines). The Project site is a 3.3-acre property that is presently owned by the Applicant. There are no vacant or underutilized sites of sufficient size along Arroyo Parkway and within walking distance of multiple transit facilities that could feasibly accommodate the Project. Additionally, the Applicant does not own other feasible alternative sites, and the City is not aware of any other feasible alternative location that would avoid or substantially lessen any potential significant impact of the Project. Further, the Applicant cannot be expected nor required to acquire, control, or have access to another site that could accommodate the Project. Therefore, due to lack of viable and comparable sites in the site vicinity that would allow for development of the Project in a manner that would avoid or substantially lessen the Project's significant impacts (before mitigation), development of the Project on an alternative site was rejected from consideration. (Draft EIR, p. 4-4 through 4-5)

Project with No Variance for Historic Resources

An alternative PD project without a variance for historic resources to increase the height of Buildings A and B was considered. This alternative would result in a total of 401,171 sf of aboveground development (including the 73,671-sf Whole Foods Market). To accommodate a project of this size, this alternative would involve demolition of 8 (of the 9) existing buildings, including the two historic buildings, totaling 51,794 sf, and construction of 327,500 sf of new development in 2 buildings representing a FAR of 2.77. These buildings would have up to 5 stories and maximum heights, including parapets, of 65 feet (with height averaging). This alternative would have up to 709 parking spaces in 5 subterranean levels. While there are no significant and unavoidable impacts associated with the Project or Project with Building A Residential/Commercial, this alternative would result in a new significant impact due to demolition of two historic buildings that would be considered significant and unavoidable. Therefore, this alternative was rejected from consideration. (Draft EIR, p. 4-5)

5.2 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

The alternatives described below were determined to represent a reasonable range of alternatives and were carried forward for detailed consideration in the EIR, which are further described in this section:

- Alternative 1: No Project/No Development,
- Alternative 2: Project Development with Existing Zoning,
- Alternative 3: All Residential Project with Variance for Historic Resources, and
- Alternative 4: All Medical Office Project with Variance for Historic Resources. (Draft EIR, p. 4-3)

With respect to the No Project alternative, Section 15126.6(e) of the State CEQA Guidelines requires than a Draft EIR evaluate a "no project" alternative to allow decision makers to compare the impacts of approving a proposed Project with the impacts of not approving that proposed Project. Section 15126.6(e)(3) of the State CEQA Guidelines describes the two general types of no project alternative: (1) when the proposed Project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the no project alternative would be the continuation of that plan and (2) when the proposed Project is other than a land use/regulatory plan, such as a specific development on an identifiable property, the no project alternative is the circumstance under which that proposed Project is not processed (i.e., no development). The second type of no project alternative was addressed in the EIR (refer to Alternative 1). (Draft EIR, p. 4-6)

For the build alternatives, it is assumed that regulatory requirements and project-specific mitigation measures identified for the Project and Project with Building A Residential/Commercial would also be implemented with these alternatives (Alternatives 2 through 4), and thus serve to reduce or avoid the potentially significant impacts similar to the Project and Project with Building A Residential/Commercial. (Draft EIR, p. 4-6)

5.2.1 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT

Description: Under the No Project/No Development Alternative, as required by CEQA, the existing environmental setting would remain unchanged. The City would not approve a PD Plan and rezone the site to a PD zone nor would the City approve the Project or Project with Building A Residential/Commercial. This Alternative assumes the Project site would continue to remain in its existing state without demolition of any existing structures and site improvements and would continue the use and operation of the existing land uses present at the time the NOP was distributed in August 2021. (Draft EIR, p. 4-6)

Finding: The No Project/No Development Alternative would avoid all potential impacts from the Project or Project with Building A Residential/Commercial, which are less than significant for each environmental topic addressed in this Draft EIR with adherence to applicable regulations and implementation of mitigation, which would be required during construction only. However, in the absence of the Project or Project Building A Residential/Commercial, no land use benefits would be achieved. Also, Alternative 1 would not meet any of the Project objectives. Therefore, the City rejects Alternative 1: No Project/No Development. (Draft EIR, p. 4-9)

5.2.2 ALTERNATIVE 2: PROJECT DEVELOPMENT WITH EXISTING ZONING

Description: Alternative 2 assumes the site is developed with the same land uses as the Project or Project with Building A Residential/Commercial but with application of existing zoning (i.e., no PD Plan). The site is zoned CD-6 (Central District, Arroyo Corridor/Fair Oaks subdistrict). Alternative 2 is analyzed with two scenarios, where appropriate based on the results of the comparative analysis, same as the Project. Alternative 2 would result in a total of 217,280 sf of aboveground development, including the 79,553 sf of existing development to be retained. This amount of total aboveground development reflects the 1.5 FAR consistent with CD-6 zoning. This alternative would involve demolition of 6 (of the 9) existing buildings totaling 45,912 sf, same as the Project or Project with Building A Residential/Commercial, and construction of 2 new buildings with 137,727 sf of new development. Based on the same proportions of proposed land uses with the Project and Project with Building A Residential, Alternative 2 would result in the following:

- Building A: a 62,682-sf, 5-story (aboveground) medical office building with 3,000 sf ground-floor commercial uses;

- Building B: a 75,045-sf, 5-story (aboveground) assisted living building with 34,922 sf of assisted living uses and 40,123 sf of independent living uses including up to 51[2] senior housing units; and
- Up to 387 parking spaces in 3 subterranean levels.[3]

Like the Project with Building A Residential/Commercial, Alternative 2 could result in the following in Building A (referred to herein as Alternative 2 with Building A Residential/Commercial):

- 3,000 sf of commercial and a sales/leasing management office on the ground floor;
- Up to 108 residential dwelling units[4]; and
- Up to 282 parking spaces in 2 subterranean levels (1 fewer level than Alternative 2 as proposed above)[2].

Alternative 2 would have maximum building heights, including parapets, of 50 feet or 65 feet with height averaging. This alternative assumes the historic resources would be retained and incorporated into the design, but with no variance proposed. Alternative 2 assumes the retained historic buildings would operate as restaurants, same as the Project. Because the same building footprints as the Project are assumed under Alternative 2, the same number and locations of trees would be removed, and the planting of two new street trees would be required. The points of ingress/egress and on-site circulation would be the same as the Project.

Alternative 2 would involve the same construction phases and overall schedule as the Project, with construction beginning in 2023 over approximately 34 months. While the overall scope of this alternative is reduced compared to the Project, it would remain as a substantial building effort. Because there would be fewer levels of subterranean parking, based on a proportional reduction in grading per level for the Project, this alternative would involve the following volumes of excavation and export:

- Alternative 2: approximately 110,406 cy of soil generating an estimated 7,886 one-way truck trips over the course of 4 months (103 workdays); and
- Alternative 2 with Building A Residential/Commercial: approximately 73,604 cy of soil, generating an estimated 5,257 one-way truck trips over the course of 4 months (103 workdays). (Draft EIR, p. 4-9 through 4-11)

Finding: Alternative 2 and Alternative 2 with Building A Residential/Commercial would result in comparatively reduced impacts related to air quality, GHG emissions, noise, public services, recreation, transportation, and utilities and service systems. This alternative would result in similar impacts related to cultural and paleontological resources, hazards and hazardous materials, land

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[2] Based on the same proportion of housing units with implementation of the Project with Building A Residential/Commercial (68 percent market rate residential and 32 percent senior living units) to the maximum dwelling units that would be permitted with 48 du/ac (159). In other words, 159 * 0.68 = 108 residential units; 159 – 108 = 51 senior units.

[3] Based on off-street parking requirements specified in Chapter 17.46 of the PMC. For building B assisted living where parking is determined through the entitlement process, the allocation is based on the same proportion of parking spaces with implementation of the Project and Project with Building A Residential/Commercial.

[4] Based on the same proportion of housing units with implementation of the Project with Building A Residential/Commercial (68 percent market rate residential and 32 percent senior living units) to the maximum dwelling units that would be permitted with 48 du/ac (159). In other words, 159 * 0.68 = 108 residential units; 159 – 108 = 51 senior units.

use and planning, and tribal cultural resources. Regarding energy, while this Alternative would result in a reduced VT and VMT compared to the Project and Project with Building A Residential/Commercial, it would also represent a less efficient use of the site. This Alternative would result in the same amount of demolition to redevelop an underutilized site and the resulting development would be approximately half as dense as the Project. Notably, this Alternative would not reduce any of the impacts identified for the Project or Project with Building A Residential/Commercial that would require mitigation during construction to reduce the impacts to a less than significant level. This alternative fails to meet many of the Project objectives. Specifically, Alternative 2 and Alternative 2 with Building A Residential/Commercial would only partially meet Project objectives 1 through 7. Therefore, the City rejects Alternative 2: Project Development with Existing Zoning. (Draft EIR, p. 4-15)

5.2.3 ALTERNATIVE 3: ALL RESIDENTIAL PROJECT WITH VARIANCE FOR HISTORIC RESOURCES

Description: Alternative 3 assumes the demolition of 6 (of the 9) existing buildings totaling 45,912 sf, construction of 2 new buildings totaling 338,376 sf, and 79,553 sf of existing development to be retained, same as the Project or Project with Building A Residential/Commercial. However, Alternative 3 assumes the new buildings would include up to 289 market-rate residential units (i.e., apartments and/or condominiums) except for ground-floor commercial in Building A. Alternative 3 would result in a total of 417,929 sf of aboveground development, including the existing buildings to be retained, as follows:

- Building A: a 154,000-sf, 7-story (aboveground) residential building and ground-floor commercial uses;
- Building B: a 184,376-sf, 7-story (aboveground) residential building; and
- Up to 607 parking spaces in 4 subterranean levels.

Alternative 3 would have maximum building heights, including parapets, of 93.5 feet, the same as the Project. This alternative assumes the historic resources would be retained and incorporated into the design with a variance for historic resources proposed. Alternative 3 assumes the retained historic buildings would operate as restaurants, same as the Project. Because the same building footprints are assumed under Alternative 3 as the Project, the same number and locations of trees would be removed, and the planting of two new street trees would also be required as a planned condition of approval. The points of ingress/egress and on-site circulation would be the same as the Project.

Alternative 3 would involve the same construction phases and overall schedule as the Project, with construction beginning in 2023 over approximately 34 months. Because there would be one fewer level of subterranean parking, like the Project with Building A Residential/Commercial that has one less subterranean level than the Project, Alternative 3 would involve excavation and export of an estimated 147,211 cy of soil, generating an estimated 10,515 one-way truck trips, over the course of 4 months (103 workdays). This would equate to an average of 102 one-way trips per workday. (Draft EIR, p. 4-15 through 4-16)

Finding: Alternative 3 would result in comparatively reduced impacts related to air quality, energy, GHG emissions, public services, recreation, transportation, and utilities and service systems. For all other topics, including cultural and paleontological resources, hazards and hazardous materials, land use and planning, noise, and tribal cultural resources, Alternative 3 would result in similar impacts. Notably, this alternative would not reduce any of the impacts identified for the

Project and Project with Building A Residential/Commercial that would require mitigation during construction to reduce the impacts to a less than significant level. This alternative fails to meet many of the Project objectives. Specifically, Alternative 3 would meet objectives 5, 6, and 7; partially meet objectives 1 and 2; and not meet objectives 3 and 4. Therefore, the City rejects Alternative 3: All Residential with Variance for Historic Resources. (Draft EIR, p. 4-20)

5.2.4 ALTERNATIVE 4: ALL MEDICAL OFFICE WITH VARIANCE FOR HISTORIC RESOURCES

Description: Alternative 4 assumes the demolition of 6 (of the 9) existing buildings totaling 45,912 sf, construction of 2 new buildings totaling 338,376 sf, and 79,553 sf of existing development to be retained, the same as the Project or Project with Building A Residential/Commercial. However, Alternative 4 assumes the new buildings would include solely medical office uses except for ground-floor commercial in Building A. Alternative 4 would result in a total of 417,929 sf of aboveground development, including the existing buildings to be retained, as follows:

- Building A: a 154,000-sf, 7-story (aboveground) medical office building and ground-floor commercial uses;
- Building B: a 184,376-sf, 7-story (aboveground) medical office building; and
- Up to 1,218 parking spaces in 7 subterranean levels.

Alternative 4 would have maximum building heights, including parapets, of 93.5 feet, the same as the Project. This alternative assumes the historic resources would be retained and incorporated into the design with a variance for historic resources proposed. Alternative 4 assumes the retained historic buildings would operate as restaurants, the same as the Project. Because the same building footprints are assumed under Alternative 4 as the Project, the same number and locations of trees would be removed, and the planting of two new street trees would be required. The points of ingress/egress and on-site circulation would be the same as the Project.

Alternative 4 would involve the same construction phases and overall schedule as the Project, with construction beginning in 2023 over approximately 34 months. Because Alternative 4 would propose two additional levels of subterranean parking, based on a proportional increase in grading per level for the Project, Alternative 4 would involve the excavation and export of approximately 257,614 cy of soil generating an estimated 18,401 one-way truck trips over the course of 4 months (103 workdays). This alternative would result in approximately 40 percent more excavation (or 73,604 cy) than the Project and approximately 75 percent more excavation (or 110,406 cy) than the Project with Building A Residential/Commercial. (Draft EIR, p. 4-21)

Finding: Alternative 4 would result in comparatively increased impacts related to air quality, energy, GHG emissions, land use and planning, and utilities and service systems. For transportation, the impacts of Alternative 4 related to conflict with the City's TIA Guidelines would be comparatively greater, and impacts related to all other transportation issues (circulation system policies, traffic safety, and emergency access) would be similar. For public services and recreation, Alternative 4 would result in comparatively reduced impacts. For all other topics, including cultural and paleontological resources, hazards and hazardous materials, noise, and tribal cultural resources, Alternative 4 would result in similar impacts. Notably, this Alternative would not reduce any of the impacts identified for the Project and Project with Building A Residential/Commercial that would require mitigation during construction to reduce the impacts to a less than significant level. This alternative fails to meet several of the Project objectives. Specifically, Alternative 4 would meet objectives 1, 2, 6, and 7; would not meet objectives 3 and 4;

and would partially meet objective 5. Therefore, the City rejects Alternative 4: All Medical Office with Variance for Historic Resources. (Draft EIR, p. 4-25 through 4-26)

5.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. Section 15126.6(e)(2) of the State CEQA Guidelines states that if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Accordingly, in accordance with the State CEQA Guidelines, a comparative evaluation of the alternatives discussed above indicates that Alternative 3 is the environmentally superior alternative because of (1) reduced comparative impacts, (2) the extent of the reduction in VT and VMT per capita compared to both the Project and Project with Building A Residential/Commercial while maximizing the redevelopment of an underutilized site near transit, and (3) a greater consistency with local, regional, and State policies adopted for the purpose of avoiding or reducing an environmental effect. However, none of the build alternatives would reduce or eliminate the significant impacts of the Project and Project with Building A Residential/Commercial with or without mitigation. This is because these impacts are related to construction activity and would occur regardless of the scope of construction. Specifically, potential impacts to cultural and tribal cultural resources are associated with any excavation in both disturbed and native soils. The potential impact related to vibration damage to the existing on-site buildings to remain would occur with any of the alternatives because the same type(s) of construction activity and equipment that could result in this impact would be used. (Draft EIR, p. 4-26 through 4-29)

SECTION 6.0 FINDING REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126(c) of the State CEQA Guidelines requires an EIR to discuss the significant irreversible environmental changes that would occur because of the project. Generally, an impact would occur under this category if, for example: (1) the proposed consumption of resources is not justified (e.g., the project involved the wasteful or inefficient use of energy); (2) the project would involve a large commitment of nonrenewable resources; or (3) the project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project.

Implementation of the Project would convert all but two of existing commercial buildings to a medical office building, commercial uses, and an assisted living building with subsurface parking and related improvements. The Project with Building A Residential/Commercial would convert the site into a residential building, commercial uses, and an assisted living building. Because the proposed uses would be a redevelopment of the site, neither the Project nor Project with Building A Residential/Commercial is considered a new long-term commitment of land resources. Nevertheless, construction activities would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment. However, the Project or Project with Building A Residential/Commercial would not be creating a need for jobs or housing. The resulting growth under either scenario would fulfill an existing and anticipated future need that is based on estimates of local and regional population growth. Therefore, the non-renewable resources used in construction would be expected to be consumed by housing and employment-generating land uses that are anticipated, and are unfulfilled, in the City and the wider region. Additionally, the land uses proposed are not unusually wasteful or excessive in terms of construction materials and fossil fuel use.

Over the long term, operation of the new land uses would require the commitment and reduction of nonrenewable and slowly renewable resources, including petroleum fuels and natural gas (for vehicle emissions, lighting, heating, and cooling of structures). Other resources that are slow to renew and/or recover from environmental stressors would also be impacted by long-term implementation of the Project or Project with Building A Residential/Commercial. However, the proposed uses would be required to meet Title 24 energy efficiency standards and applicable CALGreen requirements. As such, operation of the proposed uses would be more energy efficient than any existing uses on the site. Additionally, the land uses proposed are not unusually wasteful or excessive in terms of fossil fuel use. This is in part because of the higher density development for the Project site. Nonetheless, the Project or Project with Building A Residential/Commercial represent a long-term commitment of essentially non-renewable resources.

Regarding the potential for irreversible damage caused by environmental accidents, while construction and operation of the Project or Project with Building A Residential/Commercial would result in the use, transport, storage, and disposal of hazardous materials and/or wastes typical of urban areas, such as associated with medical/health care facilities, dry cleaners, restaurant and office cleaning/maintenance, and landscape maintenance, all activities would comply with applicable State and federal laws related to hazardous materials transport, use, and storage. This would significantly reduce the likelihood and severity of accidents that could result in irreversible environmental damage, and such an accident resulting in irreversible damage is not considered reasonably foreseeable. (Draft EIR, p. 5-1 and 5-2)

SECTION 7.0 FINDING REGARDING GROWTH-INDUCING IMPACTS

Sections 15126(d) and 15126.2(e) of the State CEQA Guidelines require and EIR to discuss the ways in which the project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth inducements; however, is not considered necessarily detrimental, beneficial, or significant to the environment.

Removing Obstacles to Growth

No major new infrastructure facilities are required to support the Project or Project with Building A Residential/Commercial beyond the new connections to existing utilities that would be constructed on the site. Approval of the PD Zoning District and PD Plan (this includes approval of the Affinity Project, zoning map amendment to rezone the property from CD-6 to PD-39, and variance for Historic Resources for Building Height) would be required to allow for development of the Project or Project with Building A Residential/Commercial. But these changes would be specific to the Project site and would not remove obstacles to growth in the surrounding area. The proposed uses under either scenario are in line with the collective uses and growth within the area and part of the development in the City that has been trending toward greater density development. (Draft EIR, p. 5-3)

Expansion of Public Services

None of the public service agencies consulted—Pasadena Fire Department; Pasadena Police Department; Pasadena's Parks, Recreation, and Community Services Department; and Pasadena Public Library—during the preparation of this Draft EIR indicated that the Project or Project with Building A Residential/Commercial would necessitate the immediate expansion of their existing resources to maintain desired levels of service. While Pasadena Unified School District was consulted, there was no response. However, Senate Bill 50 establishes developer fees that are considered full and complete mitigation for school facilities. If any public service agency's resources do need to be expanded because of Citywide growth, funding mechanisms are in place through existing regulations to accommodate such growth. (Draft EIR, p. 5-4)

Facilitating Economic Effects

During construction of the Project or Project with Building A Residential/Commercial, a number of design, engineering, and construction-related jobs would be created at the site. This would be a temporary situation, lasting until construction is completed. The construction crew would obtain commercial goods and services from existing businesses near the site. This would provide economic stimulus in the area; however, these jobs are typically filled by existing residents of the region and would not be substantial enough to foster other activities (e.g., new real estate development) that would have significant effects on the environment.

Operation of the Project would result in up to 222 residents, 737 employees, and up to 694 visitors per day. Operation of the Project with Building A Residential/Commercial would result in up to 715 residents, 95 employees, and up to 128 visitors per day. This would represent an increased demand for economic goods and services in the Project area and could, therefore, encourage the creation of new businesses, the expansion of existing businesses, or investment in commercial uses near the site that address these economic needs. At any given time, there are a variety of vacant commercial buildings for sale or lease available throughout the City that can accommodate future business. New commercial or mixed-use development not utilizing existing buildings at the

respective site would generally involve site redevelopment. Regarding expansion of commercial uses in the City resulting in environmental impacts, both the use of existing buildings (and related updates) or redevelopment of a site are generally relatively low impact activities compared to development on greenfields and/or locations without existing utility and transportation infrastructure. While there could be an indirect, growth-inducing effect caused by the Project (or Project with Building A Residential/Commercial), such development would be within the growth anticipated for the City. As of the time of Draft EIR preparation, there is over 3.3 million commercial square feet of remaining development capacity throughout the City pursuant to the City's General Plan (refer to Table 2-5 on page 2-17 of the Draft EIR). Demand for housing from on-site employees not already living in the City may also increase occupancy in the City's vacant dwelling units (estimated at 11,479 dwelling units in May 2021). Additionally, any demand for housing from employees would also be within the growth anticipated for the City, as there are 2,483 residential units in the City's remaining development capacity as of October 2021. The environmental impacts of future development near the site would have to be considered by the City as part of individual environmental reviews, in accordance with CEQA. (Draft EIR, p. 5-4 and 5-5)

Precedent-Setting Action

The Project and Project with Building A Residential/Commercial would not require a General Plan amendment, but approval of a PD district and PD Plan. Adoption of a PD zoning district would reclassify the Project site from CD-6 to PD-39, while simultaneously establishing applicable land use regulations and development standards that are specific to the newly established zoning district. The regulations and standards that dictate permitted and conditionally permitted land uses and development, would be prescribed in the accompanying PD Plan. This ensures the Project or Project with Building A Residential/Commercial is developed as intended. Development of the Project site using a PD Plan is not precedent setting because it is an existing, accepted part of the Pasadena Zoning Code.

No changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, fire codes) are proposed or required to implement this Project or Project with Building A Residential/Commercial. Mitigation measures have been identified to require that Project implementation complies with all applicable federal, State, regional, and City standards and ordinances to ensure that there are no conflicts with applicable land development regulations and that environmental impacts are minimized. Finally, creation of commercial, medical, assisted living, and/or residential facilities is not unique, such that its implementation would set a precedent, facilitating other activities and resulting in significant impacts to the environment.

While the Project may induce development or redevelopment at parcels within the Project area, the potential for reuse of unutilized commercial structures and the (re)development of lands in the surrounding area are subject to property owner discretion and often largely influenced by regional economic conditions and market demands that may have limited or major links to the Project. Site improvements may make adjacent areas more attractive to investors and promote redevelopment. These future projects would require independent environmental review under CEQA. Therefore, the impacts of subsequent proposals would require environmental analysis and associated mitigation to avoid or minimize their potential subsequent impacts. (Draft EIR, p. 5-5)

SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

Section 21081.6 of CEQA and Section 15097 of the State CEQA Guidelines require a public agency to adopt a Mitigation Monitoring and Reporting Program (MMRP) for ensuring the implementation of required mitigation measures to reduce or avoid significant environmental effects as identified in the EIR. The specific reporting and/or monitoring requirements that will be enforced during Project implementation shall be adopted simultaneously with final Project approval by the responsible decision-making body (City Council).

The MMRP for the Affinity Project, presented in Table 3, consists of Mitigation Measures (MMs) identified in the EIR that are required for Project implementation. The MMs for the Project are listed in the first column, the timing of each MM's implementation is in the second column, and the agency or party responsible for implementing the mitigation is in the third column, and the agency or party with primary responsibility for monitoring and enforcing compliance is in the fourth column.

TABLE 3
AFFINITY PROJECT MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
Cultural Resources			
MM CUL-1. To the satisfaction of the City, the Project Applicant shall engage with a licensed architect and/or engineer that meets the Secretary of the Interior's Professional Qualifications Standards for historic architect to develop a series of protection interventions and protocols that will preserve the two historical resources on the Project site – 501 and 523 South Arroyo Parkway – during all construction activities in, on, and near these two buildings. These measures shall take into consideration the protection of and security of both resources, particularly the preservation of the character-defining features through the installation of physical protective barriers around each resource and the creation of site protocols that will eliminate the potential for physical damage resulting from impacts with construction and transport equipment. To ensure the protection of these resources and their character-defining features, all protective barriers (which shall be installed prior to the initiation of any construction activity) and protocols shall be compliant with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Weeks and Grimmer 1995) (Standards) and be subject to review and approval by the City planning staff. Site protocols for protecting the historical resources shall outline issues related to site access and navigation by contractors and construction personnel to reduce the potential for any inadvertent accidents between equipment and the two on-site historical resources. Additionally, a series of emergency measures shall be developed that outlined specific step-by-step processes in the event that an accident involves one of the historical resources. This will likely include the following: 1) Stop-work protocols after an accident involving a historical resource occurs, 2) Notification procedures and identification key contacts, 3) Identification of qualified historic preservation professionals to investigate the historical resources following the determination that the area is safe, 4) Thorough conditions assessment of the resource by the qualified consultant to ascertain the level and extent of the damage, and 5) Preparation of a historical resource treatment plan to stabilize the historical resource and address the damage, which will be submitted	• Protective barriers, site protocols, and emergency measures in place prior to initiation of any construction activity • During all construction activity • Report submitted to City for approval prior to issuance of a Certificate of Occupancy	Applicant, Construction Contractor, Qualified Historic Preservation Consultant	City of Pasadena Planning & Community Development Department

TABLE 3
AFFINITY PROJECT MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
to City staff for review and approval prior to completing the work and resumption of construction activities. Additionally, protocols shall include regular on-site monitoring during construction activities by historic preservation consultant, either a SOI Qualified historic architect or architectural historian. The historic preservation consultant shall document the existing conditions of each resource prior to the initiation of any construction activity and prior to installation of the protective barriers and implementation of the protection protocols. This documentation phase will include high resolution digital photographs of each facade, as well as details of character-defining features for each resource. During construction, the historic preservation consultant shall prepare field report memoranda to the City confirming that the Standards compliant protection barriers are installed in accordance with the Standards, and that agreed upon protocols are being followed throughout the course of the Project. These memoranda will be submitted to City staff for their records and review. A final report outlining the conditions of the historical resources prior, during, and following the Project's construction shall be issued to the City for approval following construction activities and prior to the issuance of a Certificate of Occupancy.			
MM CUL-2. If cultural resources are discovered during construction of land development projects in Pasadena that may be eligible for listing in the California Register for Historic Resources, all ground disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report including site record to the City and the South-Central Coastal Information Center at California State University Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report.	During all construction activity involving excavation/ground disturbance	Applicant, Construction Contractor, Registered Professional Archaeologist	City of Pasadena Planning & Community Development Department, SCCIC

TABLE 3
AFFINITY PROJECT MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
Noise			
MM NOI-1. The potential for vibration-induced cosmetic (i.e., not structural) damage to the structures at 465, 501, and 523 South Arroyo Parkway shall be reduced by implementing the following three steps: (1) setbacks, (2) monitoring, and (3) restoration (if applicable). (1) The Project Applicant shall be responsible for ensuring the construction specifications include the following language: "Construction equipment shall observe setback distances of 30 feet from any of the three on-site buildings being retained (Whole Foods Market and 501 and 523 South Arroyo Parkway) for equipment equivalent to a large bulldozer (29,000 pounds or more) and 20 feet for jackhammers and loaded trucks. Small dozers and other equipment with vehicle weights of less (29,000 pounds) are not anticipated to result in substantial levels of vibration that could cause building damage". (2) The Project Applicant shall be responsible for placing a vibration monitor in each of the three on-site buildings to remain on the site. The contractor would need to have vibration measurements taken on the site when heavy equipment or vibration intensive activities occurs near (i.e., less than 30 feet horizontal distance) to these three buildings. Vibration measurements will be recorded and compared to the vibration thresholds appropriate for the building that may be impacted. Vibration records shall be submitted to the City once a week. The appropriate vibration thresholds are as follows: 0.12 peak particle velocity (PPV) for 501 and 523 South Arroyo Parkway and 0.30 PPV for Whole Foods Market. The Applicant shall be responsible for preparing a Monitoring Plan, describing the proposed location of vibration monitors, the timing of monitoring, collecting vibration records (including date, time, activity that precipitated the monitoring, and who recorded the vibration level), to whom and when the monitoring records will be submitted, and any remedial actions needed because of vibration readings. The Monitoring Plan is subject to review and approval by City staff and will be submitted prior to initiation of any construction activity on the site. If vibration levels are below these thresholds, it is permissible to have construction activity with large (over 29,000 pounds) equipment, jackhammers, and/or loaded trucks within the setback distances included in item 1 above. Additionally, vibration monitoring shall guide construction activity near the perimeter of these buildings during subterranean excavation and construction activity. If vibration levels are found to exceed the applicable threshold, then the associated construction activity	During preparation of construction specifications, prior to initiation of construction, and during construction activity	Applicant, Construction Contractor	City of Pasadena Planning & Community Development Department

TABLE 3
AFFINITY PROJECT MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
shall immediately halt, and alternative methods for achieving the construction activity shall be determined and employed to reduce the construction-generated vibration exposure to the building(s) to less than the thresholds. While the specific alternative methods to be employed cannot be foreseen, as it would be depending on situation-specific factors, the performance objective of maintaining activity that results in vibration below the applicable thresholds shall guide all decisions. (3) If cosmetic damage does occur to one or more of these three buildings because of vibration from Project-related construction activities despite setbacks and monitoring, the Project Applicant shall be responsible for restoring the damage. Cosmetic damage includes things like, for example, cracks in paint/plaster, fallen plaster/stucco from a facade, and cracked glass. Specifically, any restorations to Whole Foods Market shall be implemented to return the damaged area to the same condition (e.g., materials, colors, style) as present at the start of construction. Any restorations to the buildings at 501 and 523 South Arroyo Parkway shall conform to the Secretary of the Interior's Standards for the Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Weeks and Grimmer 1995) (Standards), and the determination of whether the planned restorations is consistent with the Standards shall be made by a qualified historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for architectural history or historic architecture (Professional) and to the satisfaction of the City. The restorations to the historic buildings, if necessary, may be either to the conditions present before construction was initiated or, if the planned updates to these buildings are underway may be conducted to meet proposal conditions. The City of Pasadena Planning & Community Development Department shall be responsible for ensuring these requirements are included in the construction specifications prior to any demolition activity on the site. The Project Applicant and the City's inspector assigned to the Project shall also be responsible for ensuring these measures are consistently implemented throughout the construction period.			

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AFFINITY PROJECT MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
Tribal Cultural Resources			
MM TCR-1. Prior to the commencement of any ground disturbing activity at the Project site, the Project Applicant shall accommodate a Native American Monitor (Monitor) culturally affiliated with the site as recognized by the Native American Heritage Commission (NAHC). The Monitor contracted and retained shall be at the expense of the tribe(s) that consulted on this Project. The Tribal Monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the Project area. The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the Project Site have little to no potential for impacting Tribal Cultural Resources. Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by Project construction activities shall be evaluated by the Tribal Monitor approved by the Consulting Tribe and a qualified Archaeologist (if one is present). If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance in the immediate vicinity of the find shall be halted, and the County Coroner shall be notified per Section 5097.98 of the Public Resources Code and Section 7050.5 of the Health & Safety Code. Human remains and grave/burial goods shall be treated alike per Section 5097.98(d)(1) and (2) of the Public Resources Code. Work may continue in other parts of the Project site while evaluation and, if necessary, mitigation takes place (Section 15064.5[f] of the State CEQA Guidelines). Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native	Prior to any construction activity involving excavation/ground disturbance, during excavation activity	Applicant, Construction Contractor, Consulting Tribe/Tribal Monitor (culturally affiliated with the site as recognized by the NAHC)	City of Pasadena Planning & Community Development Department, NAHC

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Mitigation Measure	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
American in origin (non-Tribal Cultural Resource) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be donated to a local school or historical society in the area for educational purposes.			
SCCIC: South Central Coastal Information Center; NAHC: Native American Heritage Commission			