

### A. INTRODUCTION

The City of Pasadena (“Lead Agency”) has prepared this Draft Environmental Impact Report (EIR) for the proposed Project in accordance with the California Environmental Quality Act (CEQA), the State CEQA Guidelines, and the City of Pasadena’s Environmental Policy Guidelines. The State CEQA Guidelines Section 15123 requires that an EIR include a summary identifying each significant effect on the environment with proposed mitigation measure(s) and alternatives that would minimize or avoid that effect. The summary is also required to identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public, and issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects.

### B. PROJECT LOCATION AND SETTING

The Project is located in the City of Pasadena (“City”), which is located approximately 10 miles northeast of the City of Los Angeles in the County of Los Angeles. The Project Site consists of the northern two-thirds of the block bounded by Los Robles Avenue, Corson Street, Oakland Avenue, and Walnut Street. The addresses associated with the Project Site include 262, 270, and 282 North Los Robles Avenue, and 251, 265, 275, 285, and 303 North Oakland Avenue.

The Project Site is currently developed with multi-family residential buildings, a small undeveloped lot, and a surface parking lot. The Project Site is part of the Walnut Housing Sub-District and Transit-Oriented Area of the Central District Specific Plan.

### C. PROJECT OBJECTIVES

The objectives for the proposed Project include the following:

- Contribute to the health of the City through an economically viable infill project that would provide an increase in residential units to help meet housing demand in the City.
- Replace outdated and inefficient buildings and building operating systems with new architectural designs and energy-efficient building systems that promote energy conservation that furthers the City’s policy goals expressed in the Pasadena Green City Action Plan.
- Provide new residential opportunities in the Central District Transit-Oriented Development area that complement and are close to transit, retail, and cultural amenities.
- Create new structures that enhance the visual appearance and appeal of the area.
- Provide for development that is consistent with the goals of the Pasadena General Plan and the Central District Specific Plan, including the planning concepts of the Walnut Housing Sub-district.

- Remove properties from the Fuller Theological Seminary Master Plan and Development Agreement that are not owned by Fuller Theological Seminary.
- Authorize development that is consistent with current land use plans and zoning regulations that have been revised since the Fuller Theological Seminary Development Agreement was executed.

## **D. PROJECT CHARACTERISTICS**

The proposed Project would involve the demolition of the existing apartment buildings (totaling 173 units) and improvements on site, and the construction of a new residential community containing 307 apartments. The proposed buildings would be 4 stories and approximately 60 feet in height. The Project would include 7,400 square feet of interior amenity space, such as a fitness center, roof deck, and lounge; 40,430 square feet of private courtyard space that would feature landscaped courtyards, outdoor kitchens, and a pool and spa area; and 14,750 square feet of private balcony/patio areas. The proposed unit mix is 36 studios, 166 one-bedroom units, and 105 two-bedroom units. Unit sizes and floorplans would be intermixed on each level. A total of 521 parking spaces would be provided in two underground levels, including guest parking spaces. Of the total spaces, approximately 10 handicapped stalls would be available for residents or guests.

There are 88 existing trees on and around the property, of which 73 are proposed to be removed. Of the 73 trees proposed for removal, 70 are private and three are public trees. Only five of the private trees and all of the public trees are protected under the City's requirements. No landmark trees are proposed to be removed. The Project will comply with Pasadena's tree ordinance.

## **E. ALTERNATIVES TO THE PROJECT**

CEQA requires that an EIR describe a range of reasonable alternatives to a proposed Project that could feasibly avoid or lessen any significant environmental impacts, while attaining the basic objectives of the Project. No significant and unavoidable impacts were identified for the proposed Project; all potentially significant impacts could be mitigated to a less than significant level. However, in response to the potentially significant impacts associated with the proposed Project, the City developed and considered the following alternatives to the project:

### **Alternative 1: No Project Alternative**

Under the No Project Alternative, the existing 173 apartments would remain and would be reoccupied as housing at market rate value. Under this alternative, the apartments are not anticipated to be renovated, however, typical pre-leasing maintenance and repairs would likely occur (e.g., interior painting, cleaning, fixing of any broken items, etc.). The parking lot northwest portion of the site would remain, and the undeveloped parcel of land would remain undeveloped.

## **Alternative 2: Horizontal Mixed-Use Alternative**

Alternative 2 would feature a mix of adjacent office and residential buildings. This alternative would develop office uses within the northern half of the Project Site and residential units on the southern half of the Project Site with a small landscaped walkway in between. Based on the existing zoning of 2.25 FAR, the office portion would consist of approximately 170,000 square feet of leasable space within up to 6 levels (equivalent to the Kaiser building across Los Robles). The residential portion of the Alternative would occupy 4 levels on half the site area and would thus be half the size of the proposed Project. There would be a total of 153 units consisting of 18 studios, 83 one bedrooms, and 52 two bedrooms.<sup>1</sup> Based on the assumed potential development, approximately 770 parking spaces would be required and in order to account for the increase in parking compared to the proposed Project, two full subterranean parking levels would be utilized (rather than one full subterranean parking level and one partial subterranean parking level).

## **Alternative 3: Vertical Mixed-Use Alternative**

Alternative 3 would feature a mix of retail and residential uses within the same 4-level structure. The ground floor street frontage along Los Robles would be designed to feature retail and quick turnover restaurant uses, and residential amenities. The balance of the ground floor would be used for access, service and parking areas. Under this alternative, there would be a total of 15,000 square feet of retail and quick turnover restaurant uses, and 5,000 square feet of residential amenities on the ground floor. The residential portion of the Alternative would consist of approximately 212 residential units above the retail level, with a mix of 25 studios, 116 one bedrooms, and 72 two bedrooms. Based on the allowed potential development, approximately 409 parking spaces, approximately 112 spaces less than the proposed Project, would be required and could be accommodated in one full subterranean level of parking as well as allocation of a portion of the ground floor for parking.

## **Alternative 4: Reduced Density Alternative**

Alternative 4 would involve the re-leasing the existing 173 units on the Project Site, and construction of additional apartments on the existing vacant land and parking lot on the northwest portion of the site. The vacant lot and parking lot is approximately 39,281 square feet. At the allowed 87 dwelling units per acre, and the use of a 35% Density Bonus pursuant to State Law and Chapter 17.43 of the Pasadena municipal code, approximately 106 new units would be built on this site, for a total of 279 residential units on the Project Site. Parking for the existing 173 units would be provided by the existing parking for those units. The new 106 units would be in a five-story building approximately 60 feet in height, with 178 parking spaces in a three-level subterranean garage. Access to the garage would be from driveways on Los Robles

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<sup>1</sup> The unit counts are 50 percent of the proposed unit counts as only half the units would be constructed.

Avenue and Corson Street. The new building would also feature interior amenity space, a landscaped courtyard, and private patio/balcony areas.

## Environmentally Superior Alternative

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that the analysis of alternatives to a project shall identify an environmentally superior alternative among the alternatives evaluated. The State CEQA Guidelines indicates that if the “no project” alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. The Reduced Density Alternative (Alternative 4) would result in lesser impacts compared to the Project and is therefore the environmentally superior alternative.

## F. AREAS OF KNOWN CONTROVERSY

The CEQA Guidelines require a Draft EIR to identify areas of controversy known to the lead agency, including issues raised by other agencies and the public. Comments were received from public agencies and interested parties in response to the circulated Notice of Preparation (NOP). In compliance with CEQA Guidelines, the City held a scoping meeting as part of the Planning Commission meeting on February 8, 2017. During that meeting, community members expressed concern over the lack of affordable housing in the City and how the Project might affect this condition.

## G. ISSUES TO BE RESOLVED

The State *CEQA Guidelines*<sup>2</sup> require that an EIR present issues to be resolved by the lead agency. These issues include the choice between alternatives and whether or how to mitigate potentially significant impacts. The major issues to be resolved by the City regarding the proposed Project are whether:

- Recommended mitigation measures should be adopted or modified;
- Different mitigation measures need to be applied to the proposed Project; and
- The proposed Project or an alternative should or should not be approved.

## H. SUMMARY OF PROJECT IMPACTS

A summary of the environmental impacts associated with implementation of the Project, mitigation measures included to avoid or lessen the severity of potentially significant impacts, and residual impacts, is provided in **Table 1.0-1, Summary of Project Impacts, Mitigation Measures, and Residual Impacts**.

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<sup>2</sup> California Public Resources Code, tit. 14, sec. 15123(b)(3).

**Table 1.0-1  
Summary of Project impacts, Mitigation Measures, and Residual Impacts**

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<b>Air Quality</b>		
<b>Threshold 4.1-1: Would the project conflict with implementation of the applicable air quality plan?</b>		
<p>The 2016 Air Quality Management Plan (AQMP) was prepared to accommodate growth, reduce the high levels of pollutants within the areas under the South Coast Air Quality Management District’s (SCAQMD’s) jurisdiction, return clean air to the region, and minimize the impact on the economy. Projects that are consistent with the Southern California Association of Government (SCAG) growth projections are considered to be consistent with the AQMP. The Project would be consistent with the SCAG growth projections, the City’s General Plan build out projections and the land use and zoning designations of the Project Site. As such, the Project would not conflict with implementation of the AQMP and impacts would be less than significant.</p>	No mitigation required	Less than significant
<b>Threshold 4.1-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?</b>		
<p><b>Construction</b> The estimated maximum daily emissions for the Project during construction are based on the expected location, size, and development of the Project. Construction activities associated with the development of the Project would not exceed regional Carbon monoxide (CO), volatile organic compounds (VOCs), nitrogen oxides (NOx), sulfur oxides (SOx), coarse inhalable particulate matter (PM10), or fine inhalable particulate matter (PM2.5) concentration thresholds. Accordingly, emissions generated during construction of the Project would result in less than significant impacts.</p> <p><b>Operation</b> The level of operational emissions estimated per dwelling unit is affected by the age of the units and the assumed features incorporated into the buildings. The existing units are older and do not include current efficient features or systems, whereas the new building would comply with current code standards. As compared to the SCAQMD-established operational significance thresholds, air quality impacts during operation of the Project would be less than significant.</p>	No mitigation required	Less than significant

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<p><b>Threshold 4.1-3:</b> <i>Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors).</i></p>		
<p>According to SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed SCAQMD’s recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants. By applying SCAQMD’s cumulative air quality impact methodology, implementation of the Project would not result in exceedance of any of the criteria pollutant listed. Therefore, the Project would not result in a cumulatively considerable net increase in criteria pollutant. Accordingly, impacts would be less than significant.</p>	<p>No mitigation required</p>	<p>Less than significant</p>
<p><b>Threshold 4.1-4:</b> <i>Expose sensitive receptors to substantial pollutant concentrations.</i></p>		
<p><b>Localized Significance Threshold Analysis</b>                      The construction and operation emissions analysis for the Project assume the maximum area that would be disturbed during construction on any given day during Project buildout, and that operational emissions estimates reflect the net difference between the existing operational emissions generated by uses that would be removed from the Project Site. This analysis estimates that Project-related construction and operational emissions would not exceed the localized significance thresholds screening thresholds for the nearest sensitive receptors (i.e., the residences located to the east of the Project Site). Accordingly, impacts would be less than significant.</p> <p><b>Localized Carbon Monoxide Hotspots Analysis</b>                      Based on the traffic analysis performed by the City of Pasadena Department of Transportation, the Project would not cause any intersection to operate at LOS E or F, and would not increase delays at any intersection currently operating at LOS E or F. The increase in traffic volumes at the analyzed intersections would result in a minimal increase in background CO concentrations, which would not result in CO levels higher than the 20 ppm 1-hour standard or the 9.0 ppm 8-hour CO. As a result, no significant Project-related impacts would occur relative to future CO concentrations.</p>	<p>No mitigation required</p>	<p>Less than significant</p>

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<p><b>Toxic Air Emissions</b></p> <p>The Project does not propose land uses that are sources of significant toxic air emissions. Accordingly, the Project would not result in a significant impact.</p>		
<p><b>Threshold 4.1-5: Create objectionable odors affecting a substantial number of people.</b></p>		
<p><b>Construction</b> During the Project's construction phase, activities associated with the operation of construction equipment, the application of asphalt, the application of architectural coatings and other interior and exterior finishes, and roofing may produce discernible odors typical of most construction sites. SCAQMD Rule 1113 limits the amount of VOCs in architectural coatings and solvents to further reduce the potential for odiferous emissions. Although these odors could be a source of nuisance to adjacent uses, they would be temporary and intermittent in nature, and would not affect a substantial number of people. As construction-related emissions dissipate away from the construction area, the odors associated with these emissions would also decrease and would be quickly diluted. Accordingly, impacts would be less than significant.</p> <p><b>Operation</b></p> <p>Land uses associated with the Project operation are not expected to be a source of persistent odors, and adjacent land uses are such that the Project would not be subjected to substantial sources of objectionable odors from any surrounding land use. Any unforeseen odors generated by the Project will be controlled in accordance with SCAQMD Rule 402 (Nuisance) which would subject any offending facility to possible fines and/or operational limitations in an approved odor control or odor abatement plan. Consequently, no significant impacts from odors are anticipated.</p>	No mitigation required	Less than significant
<p><b>Cumulative Impacts</b></p>		
<p>SCAQMD's has indicated that the project-based emissions thresholds be used to determine if a project's contribution to regional cumulative emissions is cumulatively considerable. Construction and operation of the Project would result in daily emissions that fall below the thresholds of significance recommended by SCAQMD. Therefore, the contribution of these emissions to the air quality within the Air Basin is not considered to be cumulatively considerable, and thus cumulative impacts of the Project would be less than significant.</p>	No mitigation required	Less than significant

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<b>Energy</b>		
<b>Threshold 4.2-1: <i>Would the Project conflict with adopted energy conservation plans?</i></b>		
<p><b>Construction</b> Off-road construction equipment, on-road vehicular travel, and water delivery for dust control would consume a total of 10,083,963 gallons of diesel fuel, 36,501,458 gallons of gasoline fuel, and 207 kilowatt-hours of electricity during construction of the proposed Project. When compared to the regional energy supplies, construction energy would be minimal. In addition, construction activities would be temporary and would cease at the end of construction. The adopted energy conservation plans do not specifically discuss energy uses from construction activities. For this reason, and because the amount of fuel and electricity used during construction would be temporary, minimal and met by existing sources, impacts from construction would be less than significant.</p> <p><b>Operation</b> During operation of the proposed Project, energy would be consumed for a variety of purposes, including electricity consumption for lighting, laundry equipment, water supply and delivery, and other commercial operations; natural gas consumption for space heating, cooking, and laundry dryers; and transportation fuel consumption from motor vehicles driving to and from the site. It is estimated that operation of the proposed Project would result in a permanent increase in electricity and natural gas consumption. However, the proposed Project would be required to be consistent with the City’s General Plan Energy Element to reduce electricity demand by at least 10 percent. Furthermore, the building would be built in compliance with the CALGreen ordinance, including reducing water consumption by at least 20 percent. The Project would also meet the intent of Leadership in Energy and Environmental Design (LEED) Silver standards, as required by the City’s Green Building Ordinance, as well as Title 24 energy requirements. By meeting these requirements, the proposed Project would not conflict with an adopted energy conservation plan, and energy impacts would be less than significant.</p>	No mitigation required	Less than significant
<b>Threshold 4.2-2: <i>Use non-renewable resources in a wasteful and inefficient manner?</i></b>		
The proposed Project would be designed to achieve the intent of LEED Silver certification at a minimum, as required by the City’s Green Building Ordinance, and energy efficiency standards would be incorporated into the Project’s design	No mitigation required	Less than significant

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<p>so that total building-related energy consumption would meet Title 24 energy requirements. As such, the demand for electricity and natural gas would be reduced. In addition, a variety of travel mode choices would be available to the residents of the Project. As a result, the Project would result in a lower increase in consumption of transportation-related fuels than might otherwise occur. As such, energy would not be used in a wasteful and inefficient manner, and energy impacts would be less than significant.</p> <p>The availability of electricity depends on adequate general capacity of the grid and sufficient fuel supplies. The proposed Project would use 1,778,314 kWh per year, which is 0.14 percent of the 2019 demand forecasted by PWP. The proposed Project would also use approximately 1,346,370 thousand Btu (kBtu) per year, which is 0.00014 percent of the 2019 demand forecasted by SoCalGas. Because the proposed Project would use a low percentage of the total energy demand projected for the future, and both PWP and SoCalGas anticipate having sufficient capability to meet future needs, construction and operation of the proposed Project would not require the expansion of existing facilities or the construction of new facilities for either electricity or natural gas. As a result, impacts related to energy associated with operation of the proposed Project would be less than significant.</p>		
<b>Cumulative Impacts</b>		
<p><b>Electricity</b> Although future development would result in the irreversible use of both renewable and nonrenewable electricity resources during Project construction and operation, the use of such resources would be consistent with growth expectations for PWP's service area. Additionally, all new projects would be required to comply with CALGreen building standards, and the Green City Action Plan identifies specific policies to reduce energy consumption. Furthermore, PWP would continue to expand delivery capacity as needed to meet demand increases within its service area and development projects within the PWP service area would incorporate site-specific infrastructure improvements, as necessary. As such, cumulative impacts with respect to electricity infrastructure would be less than significant.</p> <p><b>Natural Gas</b> Although there would be a permanent increase in natural gas consumption, future supplies of natural gas are anticipated to be adequate to meet projected</p>	No mitigation required	Less than significant

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<p>future demand, In addition, all future projects would be built with energy conservation features as required by the CALGreen building code. Furthermore, natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCalGas occur as needed. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvement, as appropriate. As such, cumulative impacts with respect to natural gas infrastructure would be less than significant.</p> <p><b>Transportation Energy</b> Buildout of the proposed Project and additional forecasted growth in the City, including the 64 cumulative projects, would increase demand for transportation fuels. Several regulatory measures in California are expected to decrease transportation fuel usage in the future, which would reduce future demand for gasoline. Furthermore, in Pasadena, the City’s Green City Action Plan includes a goal to expand public transportation coverage to within 0.5 kilometer of all City residents, which would also reduce demand for transportation fuels. In the long term, adequate supplies are anticipated well beyond the Project buildout date. Although there would be a cumulative increase in the consumption of petroleum-based fuels, because future supplies would be adequate to meet projected demand, cumulative impacts relating to transportation fuels would be less than significant.</p>		
<b>Greenhouse Gases</b>		
<b>Threshold 4.3-1:            Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?</b>		
<p>The GHG emissions from the Project involve construction, the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment, and the generation of solid waste and wastewater. The net increase in GHG emissions generated by the Project would be 1,354.3 MTCO<sub>2</sub>e per year, below the SCAQMD recommended Tier 3 screening threshold for residential projects of 3,000 MTCO<sub>2</sub>e per year. In addition, the Project would have a net increase of 325 residents. As such, the per service population emissions would equal to 4.2 MTCO<sub>2</sub>e per capita annually, below the SCAQMD recommended Tier 4 2020 efficiency target of 4.8 MTCO<sub>2</sub>e per year per service population.</p> <p>Automobiles are a primary source of GHG emissions and therefore change in Vehicle Miles Traveled (VMT) is indicative of change in GHG emissions. The</p>	No mitigation required	Less than significant

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<p>project’s VMT per capita would be less than the City’s existing VMT per capita. As such, the Project’s contribution to vehicle-related GHG emissions would be considered less than significant.</p>		
<p><b>Threshold 4.3-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</b></p>		
<p><b>Consistency with State Requirements</b>                      In general, California’s goals and strategies for the systematic Statewide reduction of GHG emissions are embodied in the combination of EO S-3-05 and AB 32. GHG emissions that would occur from the proposed building construction and operation would be less than SCAQMD’s proposed significance criteria for residential projects. The proposed development would not hinder progress towards achieving the goals of EO S-3-05. GHG emissions would not conflict with AB 32 or EO S-3-05.</p> <p><b>Consistency with 2016 RTP/SCS Sustainable Communities Strategy</b>                      The Project Site is within a high-quality transit area as well as the Central District Specific Plan area, which promotes pedestrian-oriented uses on Colorado Boulevard. Thus, by providing housing within a transit-oriented district and within walking distance of jobs and services, the proposed Project is consistent with the goals and requirements of the RTP/SCS to reduce passenger VMT to achieve the per capita GHG emissions reduction targets of SB 32 for the SCAG region.</p> <p><b>Consistency with Green City Action Plan</b>                      The City adopted a Green Building Practices Ordinance that promotes energy conservation by mandating certain building requirements currently voluntary under CALGreen requirements. The proposed Project would be constructed in compliance with the California Green Building Standards Code and would not impede the implementation of the Green City Action Plan.</p>	<p>No mitigation required</p>	<p>Less than significant</p>
<p><b>Cumulative Impacts</b></p>		
<p>The goal of AB 32 is to require GHG emission reductions from existing conditions. To achieve Statewide goals, the California Air Resource Board (CARB) is in the process of implementing regulations to reduce Statewide GHG emissions. As recommended by CARB’s Scoping Plan, the Project would use green building features as a framework for achieving crosscutting emissions reductions. The methods used to establish this relative reduction are consistent</p>	<p>No mitigation required</p>	<p>Less than significant</p>

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<p>with the approach used in the CARB's Scoping Plan for the implementation of AB 32 through 2020. In addition, the location and design of the Project reflect and support the emphasis CARB's Scoping Plan put on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy.</p> <p>Furthermore, in conformance with City of Pasadena recommendations for green buildings, GHG emissions reductions would be achieved through energy-efficient lighting and building design; installation of low-flow appliances; and water conservation. The Project's features and GHG-reduction measures make the Project consistent with the Green City Action Plan and measures under AB 32. Therefore, the Project will result in a less than significant contribution to cumulatively significant GHG emissions.</p>		
<b>Land Use</b>		
<p><b>Threshold 4.4-1:                    Would the project physically divide an established community?</b></p>		
<p>The Project Site is located in an urbanized area featuring existing uses that are similar to the proposed uses. The Project would not result in the separation of related uses or disruption of access between land use types. Thus, impacts would be less than significant and no mitigation is necessary.</p>	<p>No mitigation required</p>	<p>Less than significant</p>
<p><b>Threshold 4.4-2:                    Would the project conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?</b></p>		
<p>The Project as proposed would be consistent with the overall intent of the City's Land Use Element, including the policies specific to the Central District. Likewise, the proposed project is consistent with the Central District Specific Plan, and zoning ordinance. The Project is also aligned with the growth policies envisioned by SCAG. As such, the proposed Project would not conflict with applicable land use plans, policies, or regulations. Impacts would be less than significant.</p> <p>Additionally, the site is within the current Fuller Master Plan (MP) and Development Agreement (DA) between the City and Fuller, and through the transfer of ownership to the Applicant, the Applicant is now also a party to the DA. The Applicant has requested that the City and Fuller amend the MP and DA to exclude the site. This change would align the purpose of the MP with property ownership and the site would then be subject to the jurisdiction of existing underlying Zoning Code and Specific Plan. The Project would not conflict with</p>	<p>No mitigation required</p>	<p>Less than significant</p>

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
applicable land use plans, policies, or regulations. Impacts would be less than significant and no mitigation is necessary.		
<b>Threshold 4.4-3: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?</b>		
The Project Site is not subject to any applicable habitat conservation plan or natural community conservation plan. The Project Site is developed with existing buildings and surface parking, and is within an urbanized area. Therefore, the Project would not conflict with any conservation plans. There would be no impact and no mitigation is necessary.	No mitigation required	No Impact
<b>Cumulative Impacts</b>		
From a land use and planning perspective, the characteristics of the Project -- redevelopment of underutilized property, development in close proximity to transit and within walking distance of amenities -- is a desired and intended outcome of the City's planning initiatives. As such, the Project does not incrementally contribute to any potential cumulative land use impacts.	No mitigation required	Less than significant
<b>Noise</b>		
<b>Threshold 4.5-1: Would the project expose persons to noise levels in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies?</b>		
<p><b>Construction</b> In accordance with the City's Noise Ordinance, construction noise equipment operated during each phase of Project construction would not exceed the 85 dB(A) threshold at a distance of 100 feet. In addition, consistent with the City's Noise Ordinance, the Project would limit construction activities to between 7:00 AM and 7:00 PM on non-holiday weekdays and between 8:00 AM and 5:00 PM on non-holiday Saturdays. Therefore, the Project would be in conformance with the City's Noise Ordinance and impacts would be less than significant.</p> <p><b>Operation</b> The Project would contribute a negligible increase in vehicle related noise along adjacent roadways. These levels would be consistent with existing vehicle related noise levels and would not increase roadway noise volumes by more than 3 dB(A) CNEL. Therefore, impacts would be considered less than significant.</p>	No mitigation required	Less than significant
<b>Threshold 4.5-2: Exposure of persons to excessive groundborne vibration or groundborne noise levels?</b>		
The primary and most intensive vibration source associated with the development of the Project would be the use of earth-moving equipment during	<b>MM N-1: Construction Management Plan</b>	Less than significant

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<p>construction. With implementation of <b>MM N-1</b>, construction activities that have the potential to generate significant vibration, would be phased to avoid simultaneous vibration sources. With implementation of the mitigation measure, and compliance with local regulatory ordinances, impacts related to vibration would be less than significant.</p>	<p>Construction activities that have the potential to generate significant vibration, namely excavation, including haul trucks, and grading/compaction, shall be phased to avoid simultaneous occurrence of multiple vibration sources.</p>	
<p><b>Threshold 4.5-3: A substantial permanent increase in ambient noise levels in the vicinity of the project</b></p>		
<p><b>Roadway Noise</b> Roadway noise levels were modeled using the Federal Highway Administration Prediction Model (FHWA-RD-88-108) to determine if operation of the Project would increase levels greater than 3 dB(A) along local roadways. The maximum noise level increase along existing roadways would be 1.1 dB(A) on Oakland Avenue, north of Walnut Street (Intersection 7). Project-related traffic would not cause noise levels along the analyzed roadways to increase by more than 3.0 dB(A). Consequently, noise impacts under the Existing plus Project scenario would be less than significant.</p> <p><b>Stationary Noise</b> The new residences constructed as part of the Project may include exterior mechanical equipment such as HVAC units and exhaust fans which would be required to comply with the Pasadena Municipal Code. In addition, the on-site equipment would be designed such that they would be shielded and appropriate noise muffling devices would be installed on the equipment to reduce noise levels that affect nearby uses. Nighttime noise limits would be applicable to any equipment items required to operate between the hours of 10:00 PM and 7:00 AM. As such, potential impacts related to stationary noise sources would be less than significant.</p>	<p>No mitigation required</p>	<p>Less than significant</p>
<p><b>Threshold 4.5-4: A substantial temporary or periodic increase in ambient noise levels in the vicinity of the project?</b></p>		
<p>Construction activities would occur within close proximity to sensitive receptors. The nearest sensitive receptors subject to elevated construction noise levels include the multi-family residential unit uses located approximately 50 feet to the east of the Project Site. The Project would be required to comply with the City’s Noise Ordinance. Furthermore, construction equipment noise levels for dumpers/tenders would be reduced to below the City’s Noise Ordinance limit for construction equipment noise of 85 dB(A) and impacts would be less than significant.</p>	<p>No mitigation required</p>	<p>Less than significant</p>

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<b>Cumulative Impacts</b>		
<p><b>Construction</b></p> <p>The nearest related projects approximately 0.13 miles away from the Project Site. Accordingly, the Project does not incrementally contribute to the construction noise impacts from these cumulative projects. Furthermore, it is expected that, as with the Project, the related projects would implement the General Plan mitigation measures, which would minimize any noise-related nuisances during construction. Therefore, the combined construction noise impact of the related projects and the Project’s contribution would not a cause a significant cumulative impact. Similarly, related projects are not located close enough to the Project Site (greater than 125 feet) to result in vibration impacts from concurrent construction. Therefore, the combined vibration impact of the related projects and the Project’s contribution would not cause a significant cumulative impact.</p> <p><b>Operation</b></p> <p>Since projects are required to adhere to the City’s noise standards, all the stationary sources would be required to provide shielding or other noise abatement measures so as not to cause a substantial increase in ambient noise levels. Moreover, due to distance, it is unlikely that noise from multiple cumulative projects would interact to create a significant combined noise impact. Traffic noise when the City of Pasadena reaches buildout would result in a noise increase of less than 5 dB. As such, it is not anticipated that a significant cumulative increase in permanent ambient noise levels would occur. Therefore, the Project’s incremental contribution to cumulative noise impacts is not cumulatively considerable.</p>	<p>No mitigation required</p>	<p>Less than significant</p>

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<b>Parks and Recreation</b>		
<p><b>Threshold 4.6-1:</b> <i>Result in a substantial adverse physical impact associated with the provisions 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 parks.</i></p> <p><b>Threshold 4.6-2:</b> <i>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.</i></p> <p><b>Threshold 4.6-3:</b> <i>Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.</i></p>		
<p>The City does not have a minimum service ratio for parks. The Project would involve the construction of a net increase of 134 units. Based on the City's average household size of 2.42 persons per household, the construction of the Project would result in approximately 325 net new residents. Within a City of 142,250, a net increase of 325 would have a negligible effect on the ratio of population to park acres. In addition, there are two community parks and one joint-use school/park within a 0.50-mile radius of the Project Site, which is considered an acceptable walking distance to parks according to the City's Green Space, Parks, and Recreation Element. The proposed Project would feature more than an acre of on-site open space, including approximately 40,000 square feet of interior courtyards, which would offset the demand on existing community parks. As such, the increase in the use of existing parks would not be burdensome such that physical deterioration of the facilities would occur. Furthermore, the applicant would be required to pay the Residential Impact Fee, as required by Pasadena Municipal Code Chapter 4.17, to offset the impact of new residential development on City parks and park facilities. Therefore, impacts would be less than significant.</p>	<p>No mitigation required</p>	<p>Less than significant</p>
<b>Cumulative Impacts</b>		
<p>The City is anticipating an increase in residential population from projects approved or proposed. As discussed in the EIR prepared for the General Plan update, the projected increase in population would result in a need for additional parkland. However, it is speculative to consider whether future park facilities, which would be subject to environmental review under CEQA prior to development, might have significant impacts. Furthermore, the contribution of this Project to the need for future parkland is not considerable, due to (1) the relatively small increase in population, and (2) the Project's meeting the</p>	<p>No mitigation required</p>	<p>Less than significant</p>

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
standards of being located within 0.50 miles of a park, per the Green Space, Parks, and Recreation Element and Master Plan. Cumulative impacts would be less than significant.		
<b>Population and Housing</b>		
<b>Threshold 4.7-1: Would the Project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</b>		
<p>SCAG has estimated that Pasadena’s population will grow by approximately 5.1 percent over the next 23 years. Based on the City’s household size in 2010 (2.42 persons per household), the construction of the Project would result in a population increase approximately 4.4 percent of the City’s population growth expected by SCAG over the next 23 years, which will be within the forecasted growth of Pasadena. The proposed Project would demolish 173 residential units and replace them with 307 residential units, a net increase of 134 residential units, which is well within the 4,272 total new residential units development cap established for the Central District Specific Plan area.</p> <p>Additionally, the proposed Project would generate minimal employment opportunities which would not substantially effect population growth in the area and could be accommodated by the existing available workforce in the region. Therefore, the Project would not induce substantial population growth, and impacts would be less than significant.</p>	No mitigation required	Less than significant
<b>Threshold 4.7-2: Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?</b>		
<p>The baseline conditions for the proposed Project include 173 residential units, occupied generally by Fuller students and faculty. The Project would replace these 173 existing residential units with 307 new residential housing units, which would be an overall increase of 134 units. Due to the decline in enrollment at Fuller, removing the existing units would not result in an unmet housing demand from Fuller students and staff. As such, the Project would not necessitate the construction of replacement housing for Fuller students and staff.</p> <p>Additionally, the City has adopted the Inclusionary Housing Ordinance (IHO) to meet demands for affordable housing. As the Applicant would be required to comply with the IHO, impacts to the amount of below-market-rate housing would be considered less than significant.</p>	No mitigation required	Less than significant

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<b>Threshold 4.7-3: Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?</b>		
<p>The proposed Project would involve the demolition of 173 residential units, which are currently vacant, and the construction of 307 new residential units built, for a net increase of 134 residential units. These 134 net additional units would provide housing opportunities for an additional 325 residents. Fuller Theological Seminary has experienced a contraction in growth and has stated that the existing housing on the site is no longer needed. As such, replacement housing is not needed to accommodate existing or future Fuller students and staff. Impacts would be less than significant.</p>	<p>No mitigation required</p>	<p>Less than significant</p>
<b>Cumulative Impacts</b>		
<p>There are 62 related projects within Pasadena. Adding the Project to the related residential projects would result in a total of 4,337 residential units and 10,496 additional residents. SCAG has projected an increase of 3,084 housing units by 2020 as compared with the 2017 DOF estimates, of 56,816 housing units. And a population increase of 7,367 by 2040 as compared with the 2017 DOF estimates of 143,333. However, it should be noted that the 4,203 proposed residential units include one single-family home, 2,979 apartments, 837 condominiums, and 386 assisted-living and senior apartments. Many of these proposed units would have fewer than the City-average persons per household, due to multifamily units on average having less bedrooms and less living space when compared to a single-family homes in Pasadena. All the related residential projects would be required to comply with the City’s Inclusionary Housing Ordinance. As such, the cumulative population and housing projections would slightly, though not substantially, exceed SCAG’s growth forecasts for the City of Pasadena. However, the cumulative population growth would not exceed the General Plan buildout population. The General Plan accommodates future growth in the City by providing for infrastructure and public services to accommodate such growth. Therefore, slightly exceeding SCAG’s projections would not result in significant impacts.</p>	<p>No mitigation required</p>	<p>Less than significant</p>

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<b>Transportation and Traffic</b>		
<p><b>Threshold 4.8-1:</b> <i>Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.</i></p> <p><b>Threshold 4.8-6:</b> <i>Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.</i></p>		
<p>The Project the project was analyzed and found to not exceed the City's thresholds contained within the General Plan for the VMT per capita, the VT per capita, proximity and quality of the bicycle network, proximity and quality of transit network analysis, and pedestrian accessibility analysis. Therefore, the Project would not result in a significant impact.</p>	<p>No mitigation required</p>	<p>Less than significant</p>
<p><b>Threshold 4.8-2:</b> <i>Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.</i></p>		
<p>Based on the estimated trip generation and the distribution modeled by the TDF, none of the criteria for study requirements, as outlined by the County congestion management plan would be met or exceeded. Therefore, impact analysis relative to the CMP was not conducted.</p>	<p>No mitigation required</p>	<p>Less than significant</p>
<p><b>Threshold 4.8-3:</b> <i>Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.</i></p>		
<p>Based on the location and land use of the Project, Threshold 4.8-3 regarding air traffic patterns is not considered to be applicable.</p>	<p>No mitigation required</p>	<p>Less than significant</p>
<p><b>Threshold 4.8-4:</b> <i>Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).</i></p>		
<p>Implementation of the Project would not alter existing roadways or create unusual design features. Driveways and sidewalks would be designed to City standards. Impacts would be less than significant.</p>	<p>No mitigation required</p>	<p>Less than significant</p>
<p><b>Threshold 4.8-5:</b> <i>Result in inadequate emergency access?</i></p>		
<p>The proposed Project would replace existing residential structures with new residential structures. The number of curb cuts would be reduced. Emergency access to the Project Site and surrounding area would occur via existing roads</p>	<p>No mitigation required</p>	<p>Less than significant</p>

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
adjacent to the Project Site and in the Project vicinity. No changes would be made to the rights of way. Therefore, impacts would be less than significant.		
<b>Cumulative Impacts</b>		
The proposed Project is consistent with the site’s General Plan designation and zoning, and thus the analysis of transportation impacts in the General Plan Draft EIR is representative of cumulative impacts including the Project. Relative to the Congestion Management Plan (CMP) analysis, the General Plan EIR identified cumulative impacts at two westbound segments of the 210 freeway and the intersection of Pasadena Avenue at California Boulevard. The impact to either segment is not likely to include Project related trips as the directions are counter to the direction of peak trips associated with the Project. Furthermore, the Project would add less than 50 trips to the I-210 during peak hours. Therefore, the Project would not make a considerable contribution to the cumulative impacts at these freeway segments. As such, the Project would not have significant cumulative impacts.	No mitigation required	Less than significant
<b>Tribal Cultural Resources</b>		
<p><b>Threshold 4.9-1:</b> <i>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:</i></p> <p><b>(1)</b> <i>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), or</i></p> <p><b>(2)</b> <i>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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</i></p>		
<p>The City sent notification of the Project to Native American tribal contacts, as well as a copy of the Notice of Preparation to the Native American Heritage Commission (NAHC). A response was received from the Gabrieleño Band of Mission Indians–Kizh Nation (Gabrieleño) and from the NAHC, resulting in a meeting between representatives of the City met and the Gabrieleño to discuss the Project.</p> <p>The City has documented three prehistoric sites in the City. The Project Site is not located in the vicinity of these known archaeological sites, and no Gabrielino community is known to have resided in the immediate vicinity of the Project</p>	<p><b>MM TCR-1:</b> The Project Applicant shall be required to obtain the services of a qualified Native American Monitor(s) approved by the Tribal Representatives from the Gabrieleño Band of Mission Indians–Kizh Nation. this Monitor must be present during all construction-related ground disturbance activities. Ground disturbance is defined by the Tribe as activities that include, but are not limited to, pavement removal, pot-holing or auguring,</p>	Less than significant

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<p>Site. However, the Project Site appears to be proximate to trade routes that linked settlements in the San Gabriel valley with the Los Angeles basin. As such, during excavation required for the proposed subterranean parking levels, TCRs could be unearthed. Therefore, mitigation measures (<b>MM TCR-1</b>, <b>MM TCR-2</b>, and <b>MM TCR-3</b>) are provided in the event that archaeological resources are discovered during the grading and excavation process.</p>	<p>grubbing, weed abatement, boring, grading, excavation, and trenching, within the project area. The Native American Monitor(s) will complete monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil, and any cultural materials identified. In addition, the monitor(s) will be required to provide insurance certificates, including liability insurance, for any archaeological resource(s) encountered during grading and excavation activities pertinent to the provisions outlined in the California Environmental Quality Act, California Public Resources Code Division 13, Section 21083.2 (a) through (k). The on-site monitoring shall end when the Project Site grading and excavation activities are completed, or when the Tribal Representatives and monitor have indicated that the site has a low potential for archeological resources.</p> <p><b>MM TCR-2:</b> All archaeological resources unearthed by project construction activities shall be evaluated by the approved Native American Monitor. If the resources are Native American in origin, the Tribe shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes. If a resource is determined by a Qualified Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or has a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance</p>	

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
	<p>with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. 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 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, they shall be donated to a local school or historical society in the area for educational purposes.</p> <p><b>MM TCR-3:</b> If any human skeletal material or related funerary objects are discovered during ground disturbance, the Native American Monitor will immediately divert work at minimum of 50 feet and place an exclusion zone around the burial. The Monitor will then notify the construction manager who will call the coroner. Work will continue to be diverted while the coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains.</p>	

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
	<p>If this type of steel plate is not available, a 24 hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the Qualified Archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes 4 or more burials, the location is considered a cemetery and a separate treatment plan shall be created. The project applicant shall consult with the Tribe regarding avoidance of all cemetery sites. Once complete, a final report of all activities are to be submitted to the NAHC.</p>	
<b>Cumulative Impacts</b>		
<p>Determinations regarding the significance of impacts of related projects on TCRs would be made on a case-by-case basis; if necessary, the applicants of related projects would be required to comply with applicable regulatory measures or implement appropriate mitigation measures. The potential discovery of Tribal Cultural Resources at the Project Site and at related projects sites would not have a compounding effect. Therefore, the proposed Project would not have a considerable contribution to potential cumulative impacts on TCRs.</p>	<p>No mitigation required</p>	<p>Less than significant</p>

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<b>Utilities and Service Systems—Water</b>		
<b>Threshold 4.10.1-1: Require or result in the construction of new storm-water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;</b>		
<p>The Project Site is currently mostly impervious surface that drains into the City’s storm drain system. The Project would likewise be predominantly impervious surface. The Project would include drainage features that would collect, retain, and release stormflow in accordance with the County’s Low Impact Development (LID) standards.<sup>3</sup> The purpose of the LID standards is to reduce the peak discharge rate, volume, and duration of flow through the use of site design and stormwater quality control measures. Adherence to these standards would limit the change in drainage resulting from the Project. Therefore, the Project would not create substantial additional stormwater runoff. Impacts would be less than significant, and no further evaluation of this issue is required.</p>	No mitigation required	Less than significant
<b>Threshold 4.10.1-2: Not have sufficient water supplies available to serve the project from existing entitlements and resources, or requires new or expanded entitlements;</b>		
<p>The proposed Project would utilize water during construction for dust control. However, the water during construction would be minimal and temporary in nature and therefore construction impacts to water would be considered less than significant.</p> <p>The estimated increase in water demand for the proposed Project subsequent to building (projected as 2019) would be 61.52 AFY. During the year 2020, for a single dry year and multiple dry years, there would be a surplus of 12 AFY of water, which would not be enough to cover the increase in water demand by the proposed Project. However, the projected demands do not include active conservation measures that PWP has and will continue to implement. Furthermore, the State of California Drought Emergency has been lifted by Governor Brown, and the prohibition on wasteful practices, and conservation will continue to be required and is expected to become more stringent over the years. Additionally, if a dry year or years were to happen in the future, by the year 2025, there would be a surplus of 439 AFY that would be more than enough for the proposed Project. The surplus of water would continue to increase through the year 2040. As such, impacts would be less than significant.</p>	No mitigation required	Less than significant

3 County of Los Angeles Department of Public Works, *Low Impact Development Standards Manual*, February 2014.

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<b>Cumulative Impacts</b>		
<p>In general, impacts to PWP water distribution infrastructure during the construction of each related project would be addressed as part of each related project’s development review process conducted by the City. In addition, each related project would be required to meet the fire flow requirements of the Pasadena Fire Department.</p> <p>The projected water demand for the City, including the cumulative projects, would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2035, as well as the intervening years (including 2016 and 2020), as concluded in PWP’s 2015 Urban Water Management Plan. Given that MWD water purchases are not expected to be constrained, and given the potential supply of the PWP’s planned groundwater storage program, PWP would supply water to the identified cumulative development. Consequently, cumulative development would not result in adverse physical impacts related to water supply and distribution services and facilities, and cumulative impacts would be less than significant.</p>	No mitigation required	Less than significant
<b>Utilities and Service Systems—Sewer</b>		
<p><b>Threshold 4.10.2-1:</b> <i>Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.</i></p> <p><b>Threshold 4.10.2-2:</b> <i>Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.</i></p> <p><b>Threshold 4.10.2-3:</b> <i>Result in a determination by the wastewater treatment provider which serves or may serve the project that is has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.</i></p>		
<p>The Project would be required to comply with applicable regulatory standards and city regulations. These include being required to pay the applicable sewer facility charge and to construct lateral connections from the proposes uses to the City’s collection line under Los Robles Avenue that meet City standards. Wastewater from the Project would have pollutant-load characteristics typical of residential uses already treated by the District. As such, impacts on water quality treatment requirements would be less than significant.</p> <p>The Project would generate an increase in average sewage flow of approximately 20,904 gallons per day (0.02 mgd). Compared to the existing capacity at the San Jose Creek Water Reclamation Plant (WRP), Whittier Narrows WRP and Los Coyotes WRP, the Sanitation District has sufficient</p>	No mitigation required	Less than significant

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<p>capacity to accommodate the Project without the need to construct new or expanded facilities. Impacts would be less than significant.</p>		
<p><b>Cumulative Impacts</b></p>		
<p>Impacts to sewer infrastructure during the construction of each related project would be addressed through the payment of the City’s sewer facility charge pursuant to Chapter 4.53 of the Pasadena Municipal Code (PMC). Thus, cumulative construction impacts associated with sewer lines would be less than significant. The 2015 General Plan Update EIR estimated wastewater generation associated with buildout of the City’s General Plan. This analysis indicated a potential increase of 5.1 mgd and concluded that capacity existed within the system to accommodate this increase. Therefore, cumulative impacts would not be significant.</p>	<p>No mitigation required</p>	<p>Less than significant</p>
<p><b>Utilities and Service Systems—Solid Waste</b></p>		
<p><b>Threshold 4.10.3-1:</b> <i>Be served by a landfill with insufficient permitted capacity to accommodate the project’s solid waste disposal needs.</i>  <b>Threshold 4.10.3-2:</b> <i>Not comply with federal, state, and local statutes and regulations related to solid waste.</i></p>		
<p><b>Construction</b>                      The Project would generate construction debris as the result of removal of existing uses on the site. The Project would also generate soil disposal as a result of excavation. Waste generated during demolition and construction would result in an incremental and intermittent increase in solid waste disposal at landfills and other waste disposal facilities. The Project Applicant is required to submit a Construction Waste Management Plan that would achieve a diversion of a minimum of 75 percent of the construction and demolition debris generated during Project construction in accordance with the City’s Construction and Demolition Ordinance (Chapter 8.62 of the PMC). Construction and demolition waste would likely be disposed of at the County’s Azusa Land Reclamation landfill or one of the State-permitted Inert Debris Engineered Fill Operation facilities. Alternatively, exported soil could be trucked to landfills and used as a daily cover, which would not count against the permitted waste disposal capacity. The County’s inert fill landfills would have adequate capacity to accommodate Project-generated inert waste, and construction impacts relative to solid waste would be less than significant.</p>	<p>No mitigation required</p>	<p>Less than significant</p>

Significance Threshold and Project Impacts	Mitigation Measures	Residual Impacts
<p><b>Operation</b></p> <p>The Project is estimated to generate 536 pounds per day of solid waste, or approximately 98 tons per year. This estimate does not take into account the amount of solid waste that could potentially be diverted in source reduction and recycling programs within the City. As described in the County’s most recent annual report on solid waste management in the County, a shortfall in permitted solid waste disposal capacity within the County is not anticipated to occur under forecasted growth and ongoing municipal efforts at waste reduction and diversion. Furthermore, the Project includes design provisions that respond to public goals that address reductions in waste generation and the resulting waste stream. The Project would be designed to comply with the City’s Building Code, which builds upon standards incorporated in CALGreen. As such, the Project would not represent a significant impact on the disposal capacity of the County landfills.</p> <p>The Project would generate solid waste that is typical of a residential building and would be handled by properly permitted waste collection services. Therefore, impacts on solid waste disposal from Project operations would be less than significant.</p>		
<b>Cumulative Impacts</b>		
<p>Like the Project, if a related project is subject to the provisions of the Pasadena Municipal Code (PMC), it would be required to submit a Construction Waste Management Plan requiring the diversion of a minimum of 75 percent of the construction and demolition debris generated during construction in accordance with the City’s Construction and Demolition Ordinance. Furthermore, as previously discussed, the County’s unclassified landfill generally does not face capacity shortages and is expected to have sufficient capacity to accommodate cumulative demand for the foreseeable future. Therefore, cumulative impacts with respect to landfill capacity would be less than significant.</p>	No mitigation required	Less than significant