

5.0 ALTERNATIVES

This section provides a description and analysis of alternatives to the proposed Project and the potential environmental consequences of each project alternative considered.

A. INTRODUCTION

The California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, provides the following framework for the formulation and analysis of alternatives in an environmental impact report (EIR):

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a Project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible.

The CEQA Guidelines require the analysis of a “No Project” alternative and the identification of the “environmentally superior alternative.” The guidelines state: “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”

The analysis of environmental effects of alternatives need not be as thorough or detailed as the analysis of the project itself. Rather, the CEQA Guidelines, Section 15126.6(d) states that the EIR shall include “sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.”

B. 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 (TOD) 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.

C. SELECTION OF ALTERNATIVES

The range of alternatives required within an EIR is governed by the “rule of reason,” under CEQA Guidelines, Section 15126.6(f), which requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. An EIR need not consider every conceivable alternative to a project. An EIR need not consider an alternative with an unlikely or speculative potential for implementation or an alternative that would result in effects that cannot be reasonably ascertained.

Alternatives should be considered that avoid or substantially lessen the significant effects of the project. As described previously in this EIR, the Project could have significant effects from noise and tribal cultural resources (TCRs). In addition, alternatives should attain most of the basic objectives of the project, as mentioned above.

The following alternatives were identified for consideration:

1. No Project Alternative
2. Horizontal Mixed-Use Alternative
3. Vertical Mixed-Use Alternative
4. Reduced-Density Alternative

D. ALTERNATIVES CONSIDERED BUT REJECTED AS INFEASIBLE

The CEQA Guidelines requires an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible and briefly explain the reasons underlying the lead agency’s determination. Section 15126.6(c) of the CEQA Guidelines states the following:

The EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination...Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The term “feasible” is defined in the CEQA Guidelines, Section 15364 as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” In 2014, the Applicant proposed to develop the site with a larger residential building project that would utilize density bonuses associated with the inclusion of affordable units. However, in reviewing the Project, and in light of the passage in 2014 of Assembly Bill 2222, it was determined that the requested density increase would only be achievable with a set-aside of more units as affordable than the Applicant was willing to consider; therefore, the Applicant did not proceed with that plan. Furthermore, this concept did not avoid any significant environmental impacts of the Project. As such, the previous proposal was considered as a possible alternative but rejected as infeasible.

Other alternatives that were considered but rejected from further analysis include alternative locations and exclusively nonresidential uses. The Project consists of improvements to a site that the Applicant has ownership control over, and there are no feasible and substantially similar sites over which the Applicant could gain control to build its project. Exclusively nonresidential use alternatives were considered but rejected as infeasible for several reasons. First, the site is within the Walnut Housing Sub-District of the City’s Central District Specific Plan, which is envisioned as Downtown Pasadena’s main residential area north of Colorado Boulevard. The Central District Specific Plan identifies a “residential priority” for the Walnut Housing Sub-District. Additionally, a nonresidential use would not satisfy many of the basic Project objectives and would not avoid any significant environmental impacts of the Project. Finally, the Applicant is a multifamily residential developer, and the City, as a matter of policy, expects the site to be developed with residential uses; therefore, nonresidential uses were not considered as an alternative.

E. ANALYSIS METHODOLOGY

Each of the alternatives selected for analysis is evaluated in sufficient detail to determine whether its overall environmental impacts would be less than, similar to, or greater than the impacts of the proposed Project. The impact analysis sections for the proposed Project (see **Section 4, Environmental Impact Analysis**, of this EIR) include design features and mitigation measures that reduce the environmental impacts of the proposed Project. The following analyses assume that equally effective design features and mitigation measures would apply to the built alternative. The alternatives analysis includes the following:

- An evaluation of the environmental impacts anticipated to occur for each issue analyzed in **Section 4** of this EIR and a determination as to the significance of those impacts. This discussion also includes an analysis of whether the alternative would avoid or substantially lessen any of the significant environmental impacts associated with the proposed Project. Where the impacts of the alternative and the Project would be roughly equivalent, the comparative impact is said to be similar.
- A summary of the comparative impacts across all of the issues.
- Identification of the environmentally superior alternative.

F. COMPARATIVE IMPACT ANALYSIS

1. Alternative 1: No Project Alternative

Section 15126.6(e) of the CEQA Guidelines requires evaluation of the No Project Alternative. As described in the CEQA Guidelines, the purpose of describing and analyzing the No Project Alternative is to allow decision makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project. Therefore, as required by the CEQA Guidelines, the analysis must examine the impacts that might reasonably be expected to occur in the foreseeable future if the proposed Project were not approved. 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 preleasing maintenance and repairs would likely occur (e.g., interior painting, cleaning, fixing of any broken items, etc.). The parking lot in the northwest portion of the site would remain, and the undeveloped parcel of land would remain undeveloped.

The No Project Alternative analysis that follows discusses the baseline conditions, as discussed in **Section 4.0**, as well as what would be reasonably expected to occur in the foreseeable future if the proposed Project were not approved.

Air Quality

Under the No Project Alternative, the Project Site would remain in its existing condition; no construction activities would occur other than any necessary preleasing repairs and maintenance activities. The 173 units would be reoccupied without being renovated. Construction emissions would, thus, be less than those of the proposed Project. Under this alternative, there would be 134 fewer residential units; however, since only minor repairs would be conducted, buildings would not be built up to energy efficient codes. Therefore, each unit would utilize more energy per unit than the proposed Project. Given that no significant and unavoidable air quality impacts were identified for the proposed Project, this alternative would not avoid or reduce the severity of significant impacts; however, impacts would be considered incrementally less than those of the proposed Project.

Energy

Under the No Project Alternative, there would be a minimal need for fuel and electricity for Project construction because the site would need only minor repairs. No increase in use of electricity, water, or natural gas relative to existing conditions would occur. At the same time, the energy efficiency that would come with new, updated structures and landscaping would not be realized. As with the proposed project, impacts to energy would be less than significant.

Greenhouse Gases

Under the No Project Alternative, the Project Site would remain in its existing condition; no construction activities would occur. However, the 173 units would have minor repairs and would be reoccupied. Construction emissions would, thus, be less than those of the proposed Project. Under this alternative, there would be 134 fewer residential units; however, because only minor repairs would be made, buildings would not be built up to energy efficient codes. Therefore, each unit would utilize more energy per unit than would the proposed Project. Given that no significant and unavoidable greenhouse impacts were identified for the proposed Project, this alternative would not avoid or reduce the severity of significant impacts. However, construction impacts would be considered less than those of the proposed Project, and operational impacts would be considered incrementally less than those of the proposed Project.

Land Use

Under the No Project Alternative, the Project Site would remain in its existing condition. The 173 units would have minor repairs and would be reoccupied. Like the Project, the No Project Alternative would not conflict with applicable land use plans, policies, or regulations. Impacts would be similar to the proposed Project and less than significant.

Noise

Under the No Project Alternative, the Project Site would remain in its existing condition. The 173 units would have minor repairs that would not involve large construction equipment and, therefore, limited if any noise or ground-borne vibration would result from construction. Operational noise would be typical of multifamily residential uses and would be similar to the existing noise environment in the surrounding neighborhood. However, given that no significant and unavoidable noise and vibration impacts were identified for the proposed Project, this alternative would not avoid or reduce the severity of significant noise or vibration impacts but, impacts would be incrementally less than the proposed Project.

Parks and Recreation

Under the No Project Alternative, no construction activities (other than minor repairs) would occur and, thus, there would be no potential for a temporary increase in local park use by construction workers. Additionally, no increase in residential uses would be developed and, consequently, there would not be a resulting increase in population. Thus, there would not be an increase in demand for parks and recreational facilities in the Project area. Therefore, no impacts to parks and recreational facilities would occur, and impacts would be less than the less than significant impacts identified for the proposed Project.

Population and Housing

Under the No Project Alternative, no construction activities would occur (other than minor repairs) and, thus, there would be no potential for a temporary increase in population from construction workers. Additionally, the additional 134 residential units would not be built, and an additional 325 residents would not be added to the Project Site. While the residential units on-site were previously offered to students and faculty at subsidized rates, under this alternative, the residential units would be offered at market rate. Similar to the Project, impacts under this alternative would be less than significant. However, given that no significant and unavoidable population and housing impacts were identified for the Project, this alternative would not avoid or reduce the severity of significant population and housing impacts.

Transportation and Traffic

Under the No Project Alternative, the Project Site would remain in its existing condition. The 173 units would have minor repairs and become reoccupied. No major construction would occur, and no new traffic would be generated by construction or operation of the Project. Given that no significant and unavoidable traffic impacts were identified for the proposed Project, this alternative would not avoid or reduce the severity of significant traffic impacts; however, impacts would be less than those for the proposed Project.

Tribal Cultural Resources

Under the No Project Alternative, the Project Site would remain in its existing condition. Maintaining the site in its existing condition would not affect any TCRs in the vicinity of the site. Additionally, no new ground-disturbing activities would occur; therefore, the potential to disturb or unearth archaeological materials would be reduced when compare to the proposed Project. However, given that no significant and unavoidable TCR impacts were identified for the proposed Project, the No Project Alternative would not avoid or reduce the severity of significant TCR impacts of the proposed Project.

Utilities and Service Systems—Water

No construction activities would occur under the No Project Alternative (other than minor repairs). As such, there would be no potential for construction activities to generate a limited and temporary water demand during construction. No new residential units or additional permanent residents would be introduced to the Project Site under this alternative. At the same time, the water efficiency that would come with new, updated structures and landscaping would not be realized. Nonetheless, the No Project Alternative would not increase the demand for water supply in a manner that could exceed the available water supplies projected by Pasadena Water and Power (PWP), or affect the water distribution network. Therefore, no impacts to water supply and infrastructure would occur, and impacts would be less than the less than significant impacts with the Project.

Utilities and Service Systems—Sewer

No construction activities would occur under the No Project Alternative (other than minor repairs). As such, there would be no potential for construction activities to generate a temporary increase in sewage as a result of construction workers on site. No new residential units or additional permanent residents would be introduced to the Project Site under this alternative. At the same time, the wastewater efficiency that would come with new, updated structures and landscaping will not be realized. Nonetheless, the No Project Alternative would not increase wastewater generation in a manner that could affect sewer infrastructure or exceed the combined available capacity at the San Jose Creek Water Reclamation Plant (WRP) and other Los Angeles County Sanitation Districts (LACSD) wastewater treatment facilities. Therefore, no impacts to the sewer system would occur, and impacts would be less than the proposed Project and less than significant.

Utilities and Service Systems—Solid Waste

No construction activities would occur under the No Project Alternative (other than minor repairs). As such, there would be limited, if any, solid waste generated by construction activities. No new residential units or increase in permanent residents would be introduced to the Project Site. As such, there would be no potential to generate additional solid waste during the operation of the No Project Alternative. Therefore, no impacts to the solid waste system would occur, and impacts would be less than the proposed Project and less than significant.

Summary of Impacts

Implementation of the No Project Alternative, would reduce environmental impacts when compared to the proposed Project. At the same time, the energy, water, and wastewater efficiency that would come with new, updated structures and landscaping would not be realized. As summarized in **Section 4.0**, all potentially significant environmental impacts of the proposed Project can be reduced to less than significant levels with the implementation of mitigation measures, and the No Project Alternative would not avoid or reduce the severity of any significant and unavoidable impacts. Impacts to Air Quality, Energy, Greenhouse Gases, Noise, Parks and Recreation, Population and Housing, Transportation and Traffic, Tribal Cultural Resources, and all Utilities and Service Systems would be less under this alternative when compared to those for the proposed Project. Impacts to Land Use would be considered the same under the No Project Alternative. A summary of impacts is provided in **Table 5.0-21, Project and Alternatives Impact Comparison Summary**.

Relationship of the Alternative to Project Objectives

Alternative 1 would maintain the residential structures previously utilized by Fuller Theological Seminary as residential opportunities in the Central District TOD area. However, this alternative would not meet any of the other Project objectives, including creating an economically viable infill project that provides an increase in residential units, replacing outdated and inefficient buildings, authorizing development consistent with current land use plans and zoning regulations that have been revised since the DA was executed, and creating new structures that enhance the visual appearance and appeal of the area.

2. 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 a 2.25 floor area ratio (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 Boulevard). 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 studio, 83 one-bedroom, and 52 two-bedroom units.¹ Based on the assumed potential development, approximately 770 parking spaces would be required, as shown in **Table 5.0-1, Alternative 2 Parking Required**. 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, as is included with the proposed Project).

As with the Project, in Alternative 2 the existing uses would be removed from the site. Therefore, when comparing potential future impacts to the existing baseline, the impact of the existing uses on the site must be subtracted from the impact of the proposed uses to arrive at a net change.

**Table 5.0-1
Alternative 2 Parking Required**

Unit Type	Ratio	Number of Units/SF	Number of Parking Spaces Required
Studio	1.25	18	23
1 Bedroom	1.75	83	146
2 Bedroom	1.75	52	91
Office	3 spaces/1,000 SF	170,000	510
		Total	770

Source: Pasadena Zoning Code, Article 4 – Site Planning and General Development Standards, Chapter 17.46.040

Table 4-6, Off-Street Parking Requirements

Note: SF = square feet.

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

Air Quality

The Horizontal Mixed-Use Alternative would increase the amount of the site that would be excavated to construct two full subterranean parking levels instead of the full and partial subterranean parking levels provided by the Project. The increase in the amount of soil export would result in an increase in air emissions associated with construction of the Project. As shown in **Table 5.0-2, Alternative 2 Construction Emissions**, construction activities for Alternative 2 would not exceed regional significance thresholds. When compared to the Project, emission levels for ROG, CO, PM10, and PM2.5 would increase, while NOx would decrease; SOx would remain the same. It is important to note that alternatives typically analyze hypothetical situations. Consequently, default construction equipment was assumed in the CalEEMod model, as opposed to the specific construction equipment list that was used for the proposed Project. Therefore, actual construction emissions may vary. However, similar to the Project, construction-related impacts would remain less than significant.

**Table 5.0-2
Alternative 2 Construction Emissions**

Maximum Construction Emissions	ROG	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Alternative 2	44.4	53.2	50.9	0.1	8.2	4.9
SCAQMD Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
Proposed Project	35.1	72.6	50.7	0.1	7.4	4.6
Net Difference (Alternative 2 – Project)	9.3	(19.4)	0.2	0.0	0.8	0.3

Source: Refer to Modeling in **Appendix C, Alternative 2 Summer and Winter, Section 2.2—Overall Construction**, for maximum construction emissions during both the summer and winter seasons.

Notes: () denotes negative values. ROG = reactive organic gases; NOx = nitrogen oxide; CO = carbon monoxide; SOx = sulfur oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

Alternative 2 would result in a reduced intensity of residential units, resulting in a decrease of 154 units when compared to the Project. However, this alternative would include a total of 170,000 square feet of commercial uses, including 249 additional parking spaces. As shown in **Table 5.0-3, Alternative 2 Operational Emissions**, the net operational emissions associated with Alternative 2 would not exceed the South Coast Air Quality Management District's (SCAQMD's) operational emission threshold. When compared to those for the Project, emission levels for ROG, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} would be incrementally greater for Alternative 2. However, similar to the Project, operational-related impacts would remain less than significant.

**Table 5.0-3
Alternative 2 Operational Emissions**

Total Operational Emissions	ROG	NO_x	CO	SO_x	PM₁₀	PM_{2.5}
	pounds/day					
Alternative 2	21.1	14.6	76.3	0.2	12.2	3.6
<i>Existing</i>	<i>(9.1)</i>	<i>(12.1)</i>	<i>(66.6)</i>	<i>(0.1)</i>	<i>(8.6)</i>	<i>(2.6)</i>
Net Total	12.0	2.5	9.7	0.1	3.6	1.0
SCAQMD Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
Proposed Project (including deduction of existing uses)	7.7	0.6	1.3	0.0	0.3	0.3
Net Difference (Alternative 2 – Project)	4.3	1.9	8.4	0.1	3.3	0.7

Source: Refer to Modeling in **Appendix C, Alternative 2 Summer and Winter, Section 2.2—Overall Construction**, for maximum construction emissions during both the summer and winter seasons.

Notes: () denotes negative values. ROG = reactive organic gases; NO_x = nitrogen oxide; CO = carbon monoxide; SO_x = sulfur oxide; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns.

The construction and operation analysis for localized significance thresholds for Alternative 2 is shown in **Table 5.0-4, Alternative 2 LST Emissions**. As shown in **Table 5.0-4**, Alternative 2–related construction and operational emissions would not exceed the LST screening thresholds for the nearest sensitive receptors (i.e., the residences located to the east of the Project Site). When compared to the Project, localized construction emissions would result in fewer emissions for NO_x and CO, and incrementally increase for PM₁₀ and PM_{2.5}. In addition, operational emissions would result in fewer emissions for NO_x and CO, PM₁₀ and PM_{2.5}. As such, similar to the Project, localized construction and operational impacts would remain less than significant.

**Table 5.0-4
Alternative 2 LST Emissions**

Source	NO _x	CO	PM ₁₀	PM _{2.5}
	pounds/day			
Construction				
Maximum On-Site Emissions	33.7	24.7	8.0	4.8
LST Threshold	123.5	1,183.3	9.1	5.5
Threshold Exceeded?	No	No	No	No
Proposed Project	52.3	34.1	7.2	4.6
Net Difference (Alternative 2 – Project)	(18.6)	(9.4)	0.8	0.2
Operational				
Maximum Area/Energy Emissions	3.2	14.2	0.3	0.3
<i>Existing area/energy emissions</i>	<i>(3.3)</i>	<i>(16.3)</i>	<i>(0.3)</i>	<i>(0.3)</i>
Net area/energy emissions	(0.1)	(2.1)	0.0	0.0
LST Threshold	123.5	1,183.3	2.5	1.5
Threshold Exceeded?	No	No	No	No
Proposed Project	2.3	11.4	0.3	0.3
Net Difference (Alternative 2 – Project)	(2.4)	(13.5)	(0.3)	(0.3)

Notes: () denotes negative values. CO = carbon monoxide; NO_x = nitrogen oxide; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns.

Energy

Alternative 2 would have a larger subterranean parking area, with two full subterranean parking levels, when compared to the proposed Project, which would have one full and partial subterranean parking levels. Therefore, this alternative would have an increase in the amount of soil that would be excavated, and energy usage during construction would be greater than that for the proposed Project. Alternative 2 would construct approximately 153 residential units, a decrease of approximately 154 residential units from the proposed Project. However, this alternative would also add 170,000 square feet of office uses. These changes would result in an increase in Vehicle Miles Traveled (VMT) per capita of approximately 5.1 as compared to the Project, which would in turn increase the amount of gasoline used during operation. Additionally, Alternative 2 would utilize a net increase of approximately 3,647,686 kWh/year for the proposed building and associated parking. This would result in an increase of approximately 1,974,435 kWh/year more than the proposed Project. In addition, Alternative 3 would utilize a net increase of approximately 1,013,270 kBtu/year for the proposed building and associated parking. This would result in approximately 333,100 kBtu/year fewer than the proposed Project. Overall, this alternative would utilize more energy than the proposed Project during Project construction and operation. However, as discussed in **Section 4.2, Energy**, of the Draft EIR, the worldwide oil supply in 2019 (buildout) would be 97.6 million barrels per day; the City's 2019 estimated power demand would be 1,291,427 megawatt-hours; and projected demand for natural gas in Southern California in 2019 is anticipated to be 2,581 MMcf/day (942,065 MMcf annually). This alternative would utilize just a fraction of projected demand for energy resources, and impacts would be considered less than significant.

Greenhouse Gases

Alternative 2 would result in a reduced intensity of residential units, resulting in a decrease of 154 units when compared to the Project. However, this alternative would include a total of 170,000 square feet of commercial uses, including 249 additional parking spaces. As shown in **Table 5.0-5, Alternative 2 GHG Emissions**, the net operational GHG emissions for Alternative 2 would be 3,753.4 metric tons of CO₂ equivalent (MTCO₂e) per year. When compared to the Project, Alternative 2 would result in an increase of 2,397.1 MTCO₂e per year. Alternative 2 would exceed the SCAQMD-recommended Tier 3 screening threshold of 3,000 MTCO₂e tons per year. As such, the Tier 4 screening threshold was utilized. This alternative would have a net increase of 352 residents,² resulting in per service population emissions equal to 10.7 MTCO₂e per capita annually, above the SCAQMD-recommended Tier 4 2020 efficiency target of 4.8 MTCO₂e per year per service population.

² Alternative 2 would result in an increase of 771 residents (which includes 370 residents and 401 employees), minus 419 existing residents, equals a net increase of 352 residents.

As discussed in **Section 4.3, Greenhouse Gas Emissions**, the Project would be consistent with State and City GHG emission reduction goals and objectives, and the Project's contribution to the cumulative global climate change would not be significant. Similar to the Project, the Horizontal Mixed-Use Alternative would be consistent with local plans, policies, and regulations adopted by the City, including the Southern California Association of Government's *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy* ("2016 RTP/SCS") and the City's Green City Action Plan, which promotes energy conservation by mandating building requirements currently under the City's Green Building Standards Code. However, Alternative 2 would result in potentially significant impacts in regard to greenhouse gas emissions impacts and under this alternative would be greater than the Project.

**Table 5.0-5
Alternative 2 GHG Emissions**

GHG Emissions Source	Emissions (MTCO₂e/year)
Construction (amortized)	62.9
Operational (mobile)	2,071.7
Area	34.1
Energy	3,547.2
Waste	114.9
Water	555.8
Total	6,386.6
<i>Existing</i>	<i>(2,633.2)</i>
Net Total Alternative 2	3,753.4
Per Service Population (net increase of 352 residents)	10.7
<i>Proposed Project Net Total</i>	<i>1,354.3</i>
Net Difference (Alternative 1 – Proposed Project)	2,399.1

Source: Refer to Appendix C, Alternative 2, Existing Annual and Annual.

Land Use

The Horizontal Mixed-Use Alternative would develop residential uses along the southern portion of the Project Site and office uses along the northern portion of the Project Site. The size of the development would be similar to the proposed Project. Similar to the proposed Project, this alternative would be consistent with all applicable land use plans, policies, and regulations, including the allowable FAR. However, the CD-3 (Walnut Housing Sub-District) encourages mixed-use projects to promote walkability and less traffic in the City. Although the proposed Project did not have any significant and unavoidable land use impacts, impacts would be even less under this alternative because the mixed-use concept would help to encourage walkability.

Noise

Under Alternative 2 and similar to the proposed Project, construction would require demolition; grading of the site, including subterranean levels; and construction of similarly sized new buildings. This alternative would create similar construction noise impacts when compared to the proposed Project.

The Horizontal Mixed-Use Alternative would develop residential uses along the southern portion of the Project Site and office uses along the northern portion of the Project Site. This alternative would add

traffic primarily to Los Robles Boulevard. Though VMT per capita would increase due to the office use, the contribution to overall traffic volumes on Los Robles Boulevard would not be substantial; thus, the increase in traffic noise would not be significant. Therefore, operational noise impacts would be similar to the project.

Parks and Recreation

Under Alternative 2, construction activities would occur and, thus, there would be a similar potential as the proposed Project for a temporary increase in local park use by construction workers, albeit nominal. Additionally, the increase in population from residential uses and the potential increase in population from employment opportunities would be similar to the proposed Project and, consequently, there would be no significant increase in impacts when compared to the proposed Project. Therefore, a similar increase in demand for parks and recreational facilities in the Project area would occur. Impacts would be less than significant and similar to those for the proposed Project.

Population and Housing

The Horizontal Mixed-Use Alternative would construct approximately 153 residential units, a decrease of approximately 154 residential units from the proposed Project. Based on the City's household size in 2010 (2.42 persons per household),³ this alternative would result in approximately 370 residents, a decrease of approximately 373 residents from the proposed Project. However, the Horizontal Mixed-Use Alternative would also have 170,000 square feet of office uses that would generate approximately 401 employees.⁴ These employees could also potentially live in the proposed residential units; however, if they did not, there would be a potential to increase the overall population in Pasadena by 771 residents (residents on site plus Project employees) which is only slightly more than the proposed Project, which has a total of 743 projected residents.

Additionally, like the Project, this alternative would change the target market of the housing on the site from the Fuller students and faculty that historically occupied the units on site to market-rate renters. Impacts under this alternative would be less than significant and similar to those for the proposed Project. Given that no significant and unavoidable population and housing impacts were identified for the proposed Project, this alternative would not avoid or reduce the severity of significant population and housing impacts.

3 City of Pasadena, *General Plan Environmental Impact Report [EIR] "Section 5.10 Population and Housing"* (certified August 2015).

4 Southern California Association of Governments (SCAG), *Employment Density Study Summary Report* (October 2001), Table II-B, Derivation of Square Feet per Employee Based on: Average Employees per Acre and Average FAR.

Transportation and Traffic

When compared to Pasadena's CEQA performance metrics, Alternative 2 would result in an increase to VMT per capita, a decrease in vehicle trips (VT) per capita, a decrease to service population and proximity to bicycle and transit networks, and a similar level of pedestrian accessibility.

VMT Per Capita

The TDF model calculation for the proposed Project indicated that the Project's incremental VMT per capita change is 10.2. Under Alternative 2, there would be an incremental VMT per capita change of 15.3, an increase of 5.1 from the proposed Project. Impacts to VMT per capita would be greater under Alternative 2; however, similar to the proposed Project, Alternative 2 would be under the adopted performance metric of 22.6. Therefore, impacts would be less than significant.

VT Per Capita

As with VMT, VT itself will likely increase with the addition of new residents, but the City can reduce VT on a per capita basis with land use policies that help Pasadena residents meet their daily needs within a short distance of home, thereby reducing trip lengths, and by encouraging development in areas with access to various modes of transportation other than auto.

The TDF model for the proposed Project indicated that Project-related VT per capita change is 2.2. Under Alternative 2, there would be an incremental VT per capita change of 1.0, a decrease of 1.2 from the proposed Project. Impacts to VT per capita would be less under Alternative 2; however, similar to the proposed Project, Alternative 2 would be under the adopted performance measure of 2.8. Therefore, impacts would be less than significant.

Proximity and Quality of the Bicycle Network

The proposed Project and Alternative 2 would occupy the same site, adjacent to Corson Street, which features a Level 2 bicycle facility. Accordingly, the TDF model indicated that the proposed Project would increase the service population within a quarter-mile of bicycle facilities to 31.8 percent. Under Alternative 2, there would be an increase in the service population within a quarter-mile of bicycle facilities to 31.9 percent, a 0.1 percent increase from the proposed Project in available service population to use bicycle facilities. Impacts bicycle network access would decrease; however, similar to the proposed Project, Alternative 2 would not cause a significant impact related to access to the bicycle network.

Proximity and Quality of the Transit Network Analysis

The proposed Project and Alternative 2 would occupy the same site, which is within a quarter-mile of multiple transit facilities. The TDF model indicated that the proposed Project would increase service

population percentage within a quarter mile of transit facilities to 66.7 percent. Under Alternative 2, there would be an increase in the service population within a quarter mile of transit facilities to 66.8 percent, a 0.1 percent increase from the proposed Project in available service population to utilize transit facilities. Impacts to the access to the transit network would decrease; however, similar to the proposed Project, Alternative 2 would not cause a significant impact related to access to the transit network.

Pedestrian Accessibility Analysis

The proximity and quality of pedestrian environment provides a measure of the average walkability in the surrounding area. The Pedestrian Accessibility score is based on the number of land use types accessible to a resident within a 5-minute walk. Any decrease in the existing Pedestrian Accessibility score would indicate a significant impact. The TDF model indicated that the pedestrian accessibility score for the Project would be 3.88. Alternative 2 would not change the pedestrian accessibility score. Therefore, similar to the proposed Project, this alternative would not result in a significant impact.

Overall impacts to transportation and traffic under Alternative 2 would be similar to those for the proposed Project.

Tribal Cultural Resources

Under the Horizontal Mixed-Use Alternative and similar to the proposed Project, demolition of the existing uses, grading of the site (including subterranean levels), and construction would occur on the Project Site. This alternative would cover the same area as the proposed Project. Similar to the Project, ground-disturbing activities would occur; however, parking would be accommodated within two full subterranean parking levels, which would increase the excavation area and amount of soil removed. Therefore, the potential to disturb or unearth archaeological materials would be greater when compared to the proposed Project. However, similar to the Project, impacts would be less than significant with incorporation of mitigation.

Utilities and Service Systems—Water

The proposed Project would develop 134 additional residential units from the existing uses, for a total of 304 residential units and as estimated in **Section 4.10.1, Utilities and Service Systems—Water**, the Project would use approximately 61.52 acre-feet per year (AFY) of water. Under Alternative 2, the proposed Project would develop 153 residential units and approximately 170,000 square feet of office space. As shown in **Table 5.0-6, Estimated Alternative 2 Water Demand**, Alternative 2 would use approximately 38.55 AFY of water. This would be a decrease of approximately 22.97 AFY of water from the proposed Project. Therefore, impacts would remain less than significant and less than the proposed Project.

**Table 5.0-6
Estimated Alternative 2 Water Demand**

Type	Number of Dwelling Units/SF	Estimated Population	Average Daily Demand	Daily Demand (gal/day)	Annual Demand (AFY)
Existing Uses					
Residential (Apartment)	173	418	169 GPCD ^a	70,642	79.13
Alternative 2 Uses					
Residential (Apartment)	153	370	169 GPCD ^a	62,530	70.04
Office	170,000	N/A	250 gal/1,000 SF ^b	42,500	47.61
Net Total				34,388	38.55

Sources:

^a Derived from 2015 GPCD use reported in 2015 UWMP

^b Assumed 125 percent of wastewater generation.

Notes: SF = square feet; gal = gallons; du = dwelling units; GPCD = gallons per capita per day; AFY = acre-feet per year.

Utilities and Service Systems—Sewer

The proposed Project would develop 134 additional residential units from the existing uses, for a total of 304 residential units and as estimated in **Section 4.10.2, Utilities and Service Systems—Sewer**, the Project would generate approximately 40,950 gallons of wastewater per day. Under Alternative 2, the proposed Project would develop 153 residential units and approximately 170,000 square feet of office space. As shown in **Table 5.0-7, Estimated Alternative 2 Sewage Flows**, Alternative 2 would generate approximately 27,952 gallons of wastewater per day. This would be a decrease of approximately 12,998 gallons of wastewater per day from the proposed Project. Therefore, impacts would remain less than significant and less than the proposed Project.

**Table 5.0-7
Estimated Alternative 2 Sewage Flows**

Type	Number of Dwelling Units/SF	Estimated Population	Average Daily Demand	Daily Demand (gal/day)
Existing Uses				
Residential (Apartment)	173	418	126 GPCD ^a	52,668
Alternative 2 Uses				
Residential (Apartment)	153	370	126 GPCD ^a	46,620
Office	170,000	N/A	200 gal/1,000 SF ^b	34,000
Net Total				27,952

Notes: SF = square feet; gal = gallons; du = dwelling units.

^a Assumed 75 percent of water generation factor (169 GPCD; See **Section 4.10.1** of this Draft EIR).

^b Sewage rates for office uses provided by the City Public Works Department.

Utilities and Service Systems—Solid Waste

The proposed Project would develop 134 additional residential units from the existing uses, for a total of 304 residential units. As estimated in **Section 4.10.3, Utilities and Service Systems—Solid Waste**, the Project would generate approximately 536 pounds of solid waste per day or 97.82 tons per year. Under Alternative 2, the proposed Project would develop 153 residential units and approximately 170,000 square feet of office space. As shown in **Table 5.0-8, Estimated Alternative 2 Solid Waste Generation**, Alternative 2 would generate approximately 171.55 tons of solid waste per year. This would be an increase of approximately 73.73 tons of solid waste per year from the proposed Project. However, as of December 2014, the total available capacity of the ten permitted landfills within Los Angeles County was 112 million tons, with a reported 2014 annual disposal of 4.5 million tons.⁵ Therefore, while impacts would be considered greater than those for the proposed Project, they would remain less than significant.

⁵ County of Los Angeles, Department of Public Works, *2014 Annual Report, Los Angeles Countywide Integrated Waste Management Plan* (December 2015).

**Table 5.0-8
Estimated Alternative 2 Solid Waste Generation**

Type	Number of Dwelling Units/SF	Solid Waste Generation	Daily Demand (lb/day)	Annual Demand (tons per year)
Existing Uses				
Residential (Apartment)	173	4 lb/du	692	126.29
Alternative 2 Uses				
Residential (Apartment)	153	4 lb/du	612	111.69
Office	170,000	6 lb/1,000 SF	1,020	186.15
Net Total			940	171.55

Source: *Estimated Solid Waste Generation and Disposal Rates*, <http://www.calrecycle.ca.gov/wastechar/wastegenrates/>. Accessed May 2017.

Notes: SF = square feet; gal = gallons; du = dwelling unit; lb = pounds.

Summary of Impacts

Implementation of the Horizontal Mixed-Use Alternative may have the potential to increase environmental impacts when compared to the proposed Project. As summarized in **Section 4.0**, all potentially significant environmental impacts can be reduced to less than significant levels with the implementation of mitigation measures. The Horizontal Mixed-Use Alternative would not avoid or reduce the severity of any significant and unavoidable impacts. Impacts to Parks and Recreation, Population and Housing, and Transportation and Traffic would be similar to the impacts under the proposed Project. Impacts to Air Quality, Energy, Noise, Tribal Cultural Resources, and Solid Waste would be greater than under the proposed Project, though still less than significant after mitigation. Impacts to Greenhouse Gases would be greater than the proposed Project, and potentially significant. Impacts to Land Use, Water, and Wastewater would be less than the impacts of the proposed Project. A summary of impacts is provided in **Table 5.0-21**.

Relationship of the Alternative to Project Objectives

The mixed-use concept in Alternative 2 would help to further the goals in the CD-3 (Walnut Housing Sub-District) land use plan. However, there would be an overall decrease in housing opportunities on the Project Site. Therefore, the Project objective that aims to provide new residential opportunities in the Central District TOD area would not be met. All other objectives would be met.

3. 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 Boulevard 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 as shown in **Table 5.0-9, Alternative 3 Parking Required**. Due to the decrease in parking, and the parking that would be accommodated on the ground floor, this alternative would only require 1 full subterranean parking level (rather than one full subterranean parking level and one partial subterranean parking level).

As with the Project, in Alternative 3 the existing uses would be removed from the site. Therefore, when comparing potential future impacts to the existing baseline, the impact of the existing uses on the site must be subtracted from the impact of the proposed uses to arrive at a net change.

**Table 5.0-9
Alternative 3 Parking Required**

Unit Type	Ratio	Number of Units/SF	Number of Parking Spaces Required
Studio	1.25	25	32
1 Bedroom	1.75	115	202
2 Bedroom	1.75	72	126
Retail	3 spaces/1,000 SF	11,250	34
Restaurants ^a	4 spaces/1,000 SF	3,750	15
Total			409

Source: Pasadena Zoning Code, Article 4 – Site Planning and General Development Standards, Chapter 17.46.040

Table 4-6, Off-Street Parking Requirements

Notes: SF = square feet.

^a Restaurants and Fast Food with up to and including 1,500 square feet of gross floor area.

Air Quality

Alternative 3 would reduce the amount of the site that would be excavated due to the one full subterranean parking level instead of the full and partial subterranean parking level provided by the Project. The reduction in the amount of soil being exported would result in a reduction in air emissions associated with construction of the Project. As shown in **Table 5.0-10, Alternative 3 Construction Emissions**, construction activities for Alternative 3 would not exceed regional significance thresholds. When compared to the Project, emission levels for ROG, NO_x, and CO would be lower, similar for SO_x, and incrementally greater for PM₁₀ and PM_{2.5} for Alternative 3. However, similar to the Project, construction-related impacts would remain less than significant.

Table 5.0-10
Alternative 3 Construction Emissions

Maximum Construction Emissions	ROG	NO_x	CO	SO_x	PM₁₀	PM_{2.5}
	pounds/day					
Alternative 3	26.4	43.3	42.7	0.1	8.2	4.9
SCAQMD Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
Proposed Project	35.1	72.6	50.7	0.1	7.4	4.6
Net Difference (Alternative 3 – Project)	(8.7)	(29.3)	(8.0)	0.0	0.8	0.3

Notes: Refer to Modeling in **Appendix C, Alternative 3 summer and winter Section 2.2 Overall Construction for maximum construction emissions during both the summer and winter seasons.**

() denotes negative values. ROG = reactive organic gases; NO_x = nitrogen oxide; CO = carbon monoxide; SO_x = sulfur oxide; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns.

Alternative 3 would construct approximately 212 residential units, a decrease of approximately 95 residential units from the proposed Project and would include a total of 15,000 square feet of retail and restaurant uses. As shown in **Table 5.0-11, Alternative 3 Operational Emissions**, the net operational emissions associated with Alternative 3 would not exceed SCAQMD's operational emission threshold. When compared to the Project, emission levels for NO_x, SO_x, PM₁₀, and PM_{2.5} would be incrementally greater for Alternative 3, while ROG and CO would be incrementally lower. However, similar to the Project, operational-related impacts would remain less than significant.

**Table 5.0-11
Alternative 3 Operational Emissions**

Total Operational Emissions	ROG	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Alternative 3	12.1	22.6	66.7	0.2	12.9	3.9
<i>Existing</i>	<i>(9.1)</i>	<i>(12.1)</i>	<i>(66.6)</i>	<i>(0.1)</i>	<i>(8.6)</i>	<i>(2.6)</i>
Net Total	3.0	10.5	0.1	0.1	4.3	1.3
SCAQMD Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
Proposed Project	7.7	0.6	1.3	0.0	0.3	0.3
Net Difference (Alternative 3 – Project)	(4.7)	9.9	(1.2)	0.1	3.0	1.0

Notes: Refer to Modeling in **Appendix C**, Alternative 3 summer and winter Section 2.2 Overall Construction for maximum construction emissions during both the summer and winter seasons

() denotes negative values. ROG = reactive organic gases; NOx = nitrogen oxide; CO = carbon monoxide; SOx = sulfur oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

The construction and operation analysis for localized significance thresholds for Alternative 3 is shown in **Table 5.0-12, Alternative 3 LST Emissions**. As shown in **Table 5.0-12**, Alternative 3–related construction and operational emissions would not exceed the LST screening thresholds for the nearest sensitive receptors (i.e., the residences located to the east of the Project Site). When compared to the Project, localized construction and operational emissions would result in fewer emissions for NOx and CO and incrementally greater for PM10 and PM2.5. As such, similar to the Project, localized construction and operational impacts would remain less than significant.

**Table 5.0-12
Alternative 3 LST Emissions**

Source	NOx	CO	PM10	PM2.5
	pounds/day			
Construction				
Maximum On-Site Emissions	33.7	24.7	8.0	4.8
LST Threshold	123.5	1,183.3	9.1	5.5
Threshold Exceeded?	No	No	No	No
Proposed Project	52.3	34.1	7.2	4.6
Net Difference (Alternative 3 – Project)	(18.6)	(9.4)	0.8	0.2
Operational				
Maximum Area/Energy Emissions	4.1	19.3	0.4	0.4
<i>Existing area/energy emissions</i>	<i>(3.3)</i>	<i>(16.3)</i>	<i>(0.3)</i>	<i>(0.3)</i>
Net area/energy emissions	0.8	3.0	0.1	0.1
LST Threshold	123.5	1,183.3	2.5	1.5
Threshold Exceeded?	No	No	No	No
Proposed Project	2.3	11.4	0.3	0.3
Net Difference (Alternative 3 – Project)	(1.4)	(8.4)	(0.2)	(0.2)

Notes: () denotes negative values. CO = carbon monoxide; NO_x = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

Energy

Alternative 3 would involve similar construction activities to those associated with the Project, including grading and construction of the 3.53-acre site. However, the subterranean ground level would only require one full level. Therefore, energy usage during construction, would be slightly less when compared to the proposed Project. Alternative 3 would construct approximately 212 residential units, a decrease of approximately 95 residential units from the proposed Project. However, this alternative would also have 15,000 square feet of retail and quick turnover restaurant uses. Alternative 3 would utilize a net increase of approximately 1,243,563 kWh/year for the proposed building and associated parking. This would result in approximately 429,688 kWh/year fewer than the proposed Project. In addition, Alternative 3 would utilize a net increase of approximately 1,302,591 kBtu/year for the proposed building and associated parking. This would result in approximately 43,780 kBtu/year fewer than the proposed Project. Overall, this alternative would utilize less energy than the proposed Project during Project construction and operation. Therefore, impacts would be less than the proposed Project, and less than significant.

Greenhouse Gases

Alternative 3 would result in a reduced intensity of residential units, resulting in a decrease of 95 units when compared to the Project. However, this alternative would include a total of 15,000 square feet of retail and restaurant uses. As shown in **Table 5.0-13, Alternative 3 GHG Emissions**, the net operational GHG emissions for Alternative 3 would generate 2,052.2 MTCO₂e per year, below the Tier 3 screening threshold of 3,000 MTCO₂e per year. The MTCO₂e per year would increase by 697.9 MTCO₂e per year from the proposed Project.

As discussed in **Section 4.3, Greenhouse Gas Emissions**, the Project would be consistent with State and City GHG emission reduction goals and objectives and the project's contribution to the cumulative global climate change would not be significant. Similar to the Project, Alternative 3 would be consistent with local plans, policies, and regulations adopted by the City including the 2016 RTP/SCS and the City's Green City Action Plan, which promotes energy conservation by mandating building requirements currently under the City's Green Building Standards Code. As such, Alternative 3 would have greater impacts than the proposed Project; however, impacts would be less than significant in regard to greenhouse gas emissions.

Table 5.0-13
Alternative 3 GHG Emissions

GHG Emissions Source	Emissions (MTCO ₂ e/year)
Construction (amortized)	47.6
Operational (mobile)	2,632.7
Area	62.1
Energy	1,490.9
Waste	64.5
Water	253.3
Total	4,685.4
<i>Existing</i>	<i>(2,633.2)</i>
Net Total Alternative 3	2,052.2
<i>Proposed Project Net Total</i>	<i>1,354.3</i>
Net Difference (Alternative 3 – Proposed Project)	697.9

Refer to **Appendix C**, Alternative 3 Existing Annual and Annual

Land Use

The Vertical Mixed-Use Alternative would develop retail and quick turnover restaurant uses, and parking on the first floor and residential uses on the top three levels, on the Project Site. The size of the development would be similar to the proposed Project. Similar to the proposed Project, this alternative would be consistent with all applicable land use plans, policies, and regulations, including the allowable FAR. However, the CD-3 (Walnut Housing Sub-District), encourages mixed-use Projects to encourage walkability and less traffic in the City. Although the proposed Project did not have any significant and unavoidable land use impacts, impacts would be even less under this alternative, as the mixed-use concept would help to encourage walkability.

Noise

Under the Vertical Mixed-Use Alternative and similar to the proposed Project, construction would require demolition, grading of the site including one subterranean level, and construction of a similar size, new building. This alternative would not require the second half level of subterranean parking therefore, construction impacts would be slightly less than the proposed Project.

The Vertical Mixed-Use Alternative would develop retail and quick turnover restaurant uses and parking on the first floor and residential uses on the top three levels of the Project Site. This alternative would add traffic primarily to Los Robles Boulevard. Though peak-hour trips would increase, the contribution to overall traffic volumes on Los Robles would not be substantial and thus the increase in traffic noise would not be significant. Therefore, operational noise impacts would be similar to the Project and less than significant.

Parks and Recreation

Under the Vertical Mixed-Use Alternative, construction activities would occur and, thus, there would be a similar potential as the proposed Project for a temporary increase in local park use by construction workers, albeit nominal. Additionally, the increase in population from residential uses and the potential increase in population from employment opportunities would be similar to the proposed Project and, consequently, there would no significant increase in impacts when compared to the proposed Project. Therefore, a similar increase in demand for parks and recreational facilities in the Project area would occur and impacts would be less than significant impacts, as identified for the proposed Project.

Population and Housing

The Vertical Mixed-Use Alternative would construct approximately 212 residential units, a decrease of approximately 95 residential units from the proposed Project. Based on the City's household size in 2010 (2.42 persons per household),⁶ this alternative would result in approximately 513 residents, a decrease of approximately 230 residents from the proposed Project. However, the Vertical Mixed-Use Alternative would also have 15,000 square feet of retail and quick turnover restaurant uses, that would generate approximately 35 employees.⁷ These employees could also potentially live in the proposed residential units; however, if they did not, there would be a potential to increase the overall population in Pasadena by 548 residents (residents on site plus project employees) which is less than the proposed Project, which has a total of 743 projected residents.

Additionally, like the Project, this alternative would change the target market of the housing on the site from the Fuller students and faculty that historically occupied the units onsite to market-rate renters. Similar to the Project, impacts under this alternative would be less than significant and similar to those of the proposed Project. Given that no significant and unavoidable population and housing impacts were identified for the proposed Project, this alternative would not avoid or reduce the severity of significant population and housing impacts.

Transportation and Traffic

The City of Pasadena has developed thresholds for determining whether or not transportation review by the Pasadena Department of Transportation is necessary. The Department has established communitywide significance thresholds to identify projects that warrant analysis for potentially significant impacts on transportation and traffic. Communitywide significance projects are defined as 50,000 square feet of new commercial use, 50 residential units, or any combination of the two.⁸ This alternative would result in a net increase of 39 residential units and 15,000 square feet of new commercial, both under the communitywide significance thresholds. Projects below communitywide significance thresholds are presumed to have less than significant impacts to transportation and traffic. Therefore, impacts would be less than significant and similar to the project.

6 City of Pasadena, *General Plan EIR "Section 5.10, Population and Housing"* (certified August 2015).

7 SCAG, *Employment Density Study Summary Report*, Table II-B.

8 Pasadena Department of Transportation, *Transportation Impact Analysis Current Practice & Guidelines*, Section 2: Thresholds.

Tribal Cultural Resources

Under the Vertical Mixed-Use Alternative and similar to the proposed Project, demolition of the existing uses, grading of the site, and construction would occur on the Project Site. However, this alternative would only have one subterranean parking level, rather than one full subterranean parking level and one partial subterranean parking level. As such, this alternative would require less excavation activities. Therefore, the potential to disturb or unearth archaeological materials would be the less when compared to the proposed Project, though still potentially significant. However, similar to the Project, impacts would be less than significant with incorporation of mitigation.

Utilities and Service Systems—Water

The proposed Project would develop 134 additional residential units from the existing uses, for a total of 304 residential units and as estimated in **Section 4.10.1, Utilities and Service Systems-Water**, the Project would use approximately 61.52 AFY of water. Under Alternative 3, the proposed Project would develop 212 residential units, 11,250 square feet of retail uses, and approximately 3,750 square feet of restaurant uses. As shown in **Table 5.0-14, Estimated Alternative 3 Water Demand**, Alternative 3 would use approximately 24.80 AFY of water. This would be a decrease of approximately 36.72 AFY of water from the proposed Project. Therefore, impacts would be less than proposed Project, and impacts would remain less than significant.

Table 5.0-14
Estimated Alternative 3 Water Demand

Type	Number of Dwelling Units/SF	Estimated Population	Average Daily Demand	Daily Demand (gal/day)	Annual Demand (AFY)
Existing Uses					
Residential (Apartment)	173	418	169 GPCD ^a	70,642	79.13
Alternative 3 Uses					
Residential (Apartment)	212	513	169 GPCD ^a	86,697	97.11
Retail	11,250	N/A	125 gal/1,000 SF ^b	1,406	1.57
Restaurant	3,750	N/A	1,250 gal/1,000 SF ^b	4,688	5.25
Net Total				22,149	24.80

Sources:

^a Derived from 2015 GPCD use reported in 2015 UWMP.

^b Assumed 125 percent of wastewater generation.

SF = square feet; gal = gallons; du = dwelling unit; GPCD = gallons per capita per day; AFY = acre-feet per year.

Utilities and Service Systems—Sewer

The proposed Project would develop 134 additional residential units from the existing conditions, for a total of 304 residential units and as estimated in **Section 4.10.2, Utilities and Service Systems-Sewer**, the Project would generate approximately 40,950 gallons of wastewater per day. Under Alternative 3, the proposed Project would develop 212 residential units, 11,250 square feet of retail uses, and approximately 8,750 square feet of restaurant uses. As shown in **Table 5.0-15, Estimated Alternative 3 Project Sewage Flows**, Alternative 3 would generate approximately 18,845 gallons of wastewater per day. This would be a decrease of approximately 22,105 gallons of wastewater per day from the proposed Project. Impacts would be considered less than the proposed Project, and would remain less than significant.

**Table 5.0-15
Estimated Alternative 3 Sewage Flows**

Type	Number of Dwelling Units/SF	Estimated Population	Average Daily Demand	Daily Demand (gal/day)
Existing Uses				
Residential (Apartment)	173	418	126 GPCD ^a	52,668
Alternative 3 Uses				
Residential (Apartment)	212	513	126 GPCD ^a	64,638
Retail	11,250	N/A	100 gal/1,000 SF ^b	1,125
Restaurant	3,750	N/A	1,000 gal/1,000 SF ^b	3,750
Net Total				18,845

Notes: SF = square feet; gal = gallons; du = dwelling unit.

^a Assumed 75 percent of water generation factor (169 GPCD, see **Section 4.10.1** of this Draft EIR).

^b Sewage rates for retail and restaurant uses provided by the City Public Works Department.

Utilities and Service Systems—Solid Waste

The proposed Project would develop 134 additional residential units from the existing uses, for a total of 304 residential units and as estimated in **Section 4.10.3, Utilities and Service Systems—Solid Waste**, the Project would generate approximately 536 pounds of solid waste per day or 97.82 tons per year. Under Alternative 3, the proposed Project would develop 212 residential units, 11,250 square feet of retail uses, and approximately 3,750 square feet of restaurant uses. As shown in **Table 5.0-16, Estimated Alternative 3 Solid Waste Generation**, Alternative 3 would generate approximately 37.05 tons of solid waste per year. This would be a decrease of approximately 60.77 tons of solid waste per year from the proposed Project. Therefore, impacts would be considered less than the proposed Project and would remain less than significant.

Table 5.0-16
Estimated Alternative 3 Solid Waste Generation

Type	Number of Dwelling Units/SF	Solid Waste Generation	Daily Demand (lb/day)	Annual Demand (tons per year)
Existing Uses				
Residential (Apartment)	173	4 lb/du	692	126.29
Alternative 3 Uses				
Residential (Apartment)	212	4 lb/du	848	154.76
Retail	11,250	2.5 lb/1,000 SF	28	5.11
Restaurant	3,750	0.005 lb/SF	19	3.47
Net Total			203	37.05

Source: *Estimated Solid Waste Generation and Disposal Rates*, <http://www.calrecycle.ca.gov/wastechar/wastegenrates/>. Accessed May 2017.

Notes: SF = square feet; gal = gallons; du = dwelling unit; lb = pounds.

Summary of Impacts

Implementation of the Vertical Mixed-Use Alternative, may have the potential to increase environmental impacts when compared to the proposed Project. As summarized in **Section 4.0, Environmental Impact Analysis**, all potentially significant environmental impacts can be reduced to less than significant levels with the implementation of mitigation measures, and the Vertical Mixed-Use Alternative would not avoid or reduce the severity of any significant and unavoidable impacts. Impacts to Parks and Recreation, Population and Housing, Transportation and Traffic, and Tribal Cultural Resources would be similar to the impacts under the proposed Project. Impacts to Energy, Greenhouse Gases, and Noise, would be slightly greater than the proposed Project. Impacts to Air Quality, Land Use, Water, Wastewater, and Solid Waste would be less than the impacts to the proposed Project. A summary of impacts is provided in **Table 5.0-21**.

Relationship of the Alternative to Project Objectives

The mixed-use concept in Alternative 3 would help to further the goals in the CD-3 (Walnut Housing) sub-district land use plan. There would be an overall increase in housing, and all of the project objectives would be met.

4. **Alternative 4: Reduced-Density Alternative**

Alternative 4 would involve the re-leasing of 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 percent 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 5-story building approximately 60 feet in height, with 178 parking spaces in a 3-level subterranean garage. Access to the garage would be from driveways on Los Robles Avenue and Corson Street. The new building would also feature interior amenity space, a landscaped courtyard, and private patio/balcony areas.

Unlike the Project, for Alternative 4 the existing residential uses would not be removed from the site. Therefore, the potential future impacts of Alternative 4 are only evaluated for the new building that would occupy what is currently a parking lot and vacant lot. The existing residential uses are considered part of the environmental baseline and not considered part of future impacts, nor are they subtracted from the impact of the proposed uses, as they were in Alternatives 2 and 3.

Air Quality

Alternative 4 would reduce the amount of the site that would be excavated due to only a portion of the site being used for subterranean parking. The reduction in the amount of soil being exported would result in a reduction in air emissions associated with construction of the Project. As shown in **Table 5.0-17, Alternative 4 Construction Emissions**, construction activities for Alternative 4 would not exceed regional significance thresholds. When compared to the Project, emission levels for ROG, NO_x, CO, PM₁₀, and PM_{2.5} would be lower for Alternative 4, while the SO_x emission level would remain similar. However, similar to the Project, construction-related impacts would remain less than significant.

Table 5.0-17
Alternative 4 Construction Emissions

	ROG	NOx	CO	SOx	PM10	PM2.5
Maximum Construction Emissions	pounds/day					
Alternative 4	16.9	39.6	16.1	0.1	2.6	1.1
SCAQMD Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
Proposed Project	35.1	72.6	50.7	0.1	7.4	4.6
Net Difference (Alternative 4 – Project)	(18.2)	(33.0)	(34.6)	0.0	(4.8)	(3.5)

Note: Refer to Modeling in **Appendix C**, Alternative 4 additional construction summer and winter Section 2.2 Overall Construction for maximum construction emissions during both the summer and winter seasons.

() denotes negative values. ROG = reactive organic gases; NOx = nitrogen oxide; CO = carbon monoxide; SOx = sulfur oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

Alternative 4 would result in 28 fewer residential units than the proposed Project. As shown in **Table 5.0-18, Alternative 4 Operational Emissions**, the net operational emissions associated with Alternative 4 would not exceed SCAQMD's operational emission threshold. When compared to the Project, operational emission levels for NOx, CO, SOx, PM10, and PM2.5 would be greater, and the emission level for ROG would be less for Alternative 4, primarily due to the subtraction of the existing uses when determining the net impact of the Project. However, similar to the Project, operational-related impacts would remain less than significant.

**Table 5.0-18
Alternative 4 Operational Emissions**

Total Operational Emissions	ROG	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Net Total Alternative 4	6.5	6.1	34.1	0.1	5.3	1.6
SCAQMD Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
Proposed Project	7.7	0.6	1.3	0.0	0.3	0.3
Net Difference (Alternative 4 – Project)	(1.2)	5.5	32.8	0.1	5.0	1.3

Notes: Refer to Modeling in **Appendix C**, Alternative 4 summer and winter Section 2.2 Overall Construction for maximum construction emissions during both the summer and winter seasons

() denotes negative values. ROG = reactive organic gases; NOx = nitrogen oxide; CO = carbon monoxide; SOx = sulfur oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

The construction and operation analyses for localized significance thresholds for Alternative 4 is shown in **Table 5.0-19, Alternative 4 LST Emissions**. As shown in **Table 5.0-19**, Alternative 4–related construction and operational emissions would not exceed the LST screening thresholds for the nearest sensitive receptors (i.e., the residences located to the east of the Project Site). When compared to the Project, localized construction and operation would result in lower emissions for NOx, CO, PM10 and PM2.5. As such, localized construction and operational impacts would remain less than significant.

**Table 5.0-19
Alternative 4 LST Emissions**

Source	NOx	CO	PM10	PM2.5
	pounds/day			
Construction				
Maximum On-Site Emissions	10.7	8.0	1.9	0.6
LST Threshold	123.5	1,183.3	9.1	5.5
Threshold Exceeded?	No	No	No	No
Proposed Project	52.3	34.1	7.2	4.6
Net Difference (Alternative 4 – Project)	(41.6)	(26.1)	(5.3)	(4.0)
Operational				
Maximum Area/Energy Emissions	1.9	9.6	0.2	0.2
LST Threshold	123.5	1,183.3	2.5	1.5
Threshold Exceeded?	No	No	No	No
Proposed Project	2.3	11.4	0.3	0.3
Net Difference (Alternative 4 – Project)	(0.4)	(1.8)	(0.1)	(0.1)

Notes: () denotes negative value. CO = carbon monoxide; NO_x = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

Energy

Under Alternative 4, there would be a much smaller need for energy during Project construction because the site would require electricity, natural gas, and water usage only for the construction of the 106 additional units and associated parking. The existing 173 units would not require any construction and, therefore, would not use energy resources during construction. Overall, there would be 28 fewer residential units than the proposed Project, resulting in an overall decrease in electricity, natural gas, and water consumption during operation. Moreover, with 28 fewer residential units, operational fuel for transportation would be less when compared to the proposed Project.

As noted, this alternative would have 28 fewer residential units than the proposed Project, as well as significantly less subterranean parking. Alternative 4 would utilize a net increase of approximately 851,528 kWh/year for the proposed building and associated parking. This would result in approximately 821,723 kWh/year fewer than the proposed Project. In addition, with regard to natural gas consumption, Alternative 4 would utilize a net increase of approximately 1,276,490 kBtu/year for the proposed building and associated parking. This would result in approximately 69,880 kBtu/year fewer than the proposed Project. Overall, this alternative would utilize less energy than the proposed Project during Project construction and operation. Therefore, impacts would be less than the proposed Project, and less than significant.

Greenhouse Gases

Alternative 4 would result in a reduced intensity of residential units, resulting in a decrease of 28 units when compared to the Project. As shown in **Table 5.0-20, Alternative 4 GHG Emissions**, the net operational GHG emissions for Alternative 4 would generate 1,788.2 MTCO₂e per year, below the SCAQMD-recommended Tier 3 screening threshold of 3,000 MTCO₂e per year.

The uses proposed by the Project would result in 3,987.5 MTCO₂e, substantially greater than estimated for Alternative 4. However, the removal of the existing uses results in a net increase in GHG emissions from the Project of 1,354.3 MTCO₂e, whereas Alternative 4 does not result in the removal of the existing uses. As such, Alternative 4 would result in a slightly larger impact from GHG emissions, as shown in the table.

Table 5.0-20
Alternative 4 GHG Emissions

GHG Emissions Source	Emissions (MTCO₂e/year)
Construction (amortized)	20.9
Operational (mobile)	910.7
Area	23.6
Energy	712.3
Waste	24.5
Water	96.2
Net Total Alternative 4	1,788.2
<i>Proposed Project Net Total</i>	<i>1,354.3</i>
Net Difference (Alternative 4 – Proposed Project)	433.9

Refer to Appendix C, Alternative 4 Existing Annual and Annual

As discussed in **Section 4.3, Greenhouse Gas Emissions**, the Project would be consistent with State and City GHG emission reduction goals and objectives, and the Project's contribution to the cumulative global climate change would not be significant. Similar to the Project, Alternative 4 would be consistent with local plans, policies, and regulations adopted by the City, including the 2016 RTP/SCS and the City's Green City Action Plan, which promotes energy conservation by mandating building requirements under the City's Green Building Standards Code. Nonetheless, because the evaluation of the Project includes removal of the existing uses, Alternative 4 would have slightly greater impacts than the proposed Project; however, impacts would be less than significant in regard to greenhouse gas emissions.

Land Use

Alternative 4 would construct 106 residential units on the northwest portion of the Project Site. Additionally, the existing vacant 173 residential units would be put back on the market, for a total of 279 residential units. The size of the development would be similar to the proposed Project. Similar to the proposed Project, this alternative would be consistent with all applicable land use plans, policies, and regulations, including the allowable FAR. Impacts would be similar to the proposed Project and less than significant.

Noise

Alternative 4 would construct 106 residential units on the existing vacant land and parking lot on the northwest portion of the Project Site. Additionally, this alternative would involve the re-leasing of the existing vacant 173 residential units, thus resulting in a total of 279 residential units at the Project Site. Construction would involve the removal of the existing surface parking lot and development of the 106 new residential units, including 3 levels of subterranean parking garage.

Similar to the Project, construction would require site clearing, grading, asphalt paving, building construction, and building-finishing activities. These activities would involve the use of heavy equipment, such as tractors, dozers, and cranes. The nearest sensitive receptors include the existing vacant residential units immediately adjacent to the new proposed residential units. Similar to the Project, this alternative would be required to implement mitigation measure **MM N-1** to reduce potentially significant construction-related vibration impacts to the adjacent residential units to less than significant. Additionally, this alternative would result in 28 fewer residential units, thus resulting in fewer traffic-related trips when compared to the Project. As such, impacts would be less than the proposed Project.

Parks and Recreation

Under Alternative 4, no construction activities would occur on the existing residential units; full construction of 106 residential units, with 3 subterranean levels beneath, would occur on the surface parking lot and vacant area. This alternative would require significantly less construction than the proposed Project; thus, there would be low potential for a temporary increase in local park use by construction workers. Additionally, under this alternative, there would approximately 68 fewer residents than the proposed Project. Consequently, similar to the proposed Project, there would be a minimal resulting increase in population, and a minimal increase in demand for parks and recreational facilities in the Project area. Impacts to parks and recreational facilities would be less than significant.

Population and Housing

Alternative 4 would construct 106 residential units on the northwest portion of the Project Site. Additionally, the existing vacant 173 residential units would be put back on the market, for a total of 279 residential units. This alternative would have significantly less construction activity than the proposed Project; thus, there would be a minimal potential for a temporary increase in population from construction workers. Additionally, with 28 fewer residential units, this alternative would result in a smaller population increase when compared to the proposed Project. Based on the City's household size in 2010 (2.42 persons per household),⁹ this alternative would result in approximately 675 residents, a decrease of approximately 68 residents from the proposed Project. Similar to the Project, this alternative would market the units to the general public rather than to Fuller students and faculty. Also, similar to the Project, impacts under this alternative would be less than the proposed Project, and less than significant. However, given that no significant and unavoidable population and housing impacts were identified for the proposed Project, this alternative would not avoid or reduce the severity of significant population and housing impacts.

Transportation and Traffic

When compared to Pasadena's CEQA performance metrics, Alternative 4 would result in similar impacts to VMT per capita and VT per capita, similar impacts to service population and proximity to bicycle and transit networks, and a similar level of pedestrian accessibility.

VMT Per Capita

The TDF model calculation for the proposed Project indicated that the Project's incremental VMT per capita change is 10.2. Alternative 4 would contain the same uses as the proposed Project; however, there would be 28 fewer residential units and, therefore, approximately 68 fewer residents. Due to the similar uses and number of residents when compared to the proposed Project, the VMT per capita for this alternative, would result in a comparable change when compared to the proposed Project. Therefore, impacts would be similar to the proposed Project, and less than significant.

VT Per Capita

As with VMT, VT itself will likely increase with the addition of new residents, but the City can reduce VT on a per-capita basis with land use policies that help Pasadena residents meet their daily needs within a short distance of home, thereby reducing trip lengths, and by encouraging development in areas with access to various modes of transportation other than auto.

9 City of Pasadena, General Plan EIR "Section 5.10 Population and Housing", certified August 2015.

The TDF model for the proposed Project indicated that Project-related VT per capita change is 2.2. As previously mentioned, this alternative would have similar uses and number of residents when compared to the proposed Project, thus, the VT per capita for this alternative would result in a comparable change when compared to the proposed Project. Therefore, impacts would be similar to the proposed Project, and less than significant.

Proximity and Quality of the Bicycle Network

The proposed Project and Alternative 4 would be located in the same location, adjacent to a roadway, Corson Street, that features a Level 2 bicycle facility. Accordingly, the TDF model indicated that the proposed Project would increase the service population of the City within a quarter-mile of bicycle facilities to 31.8 percent. Under Alternative 4, the population of the Project Site would be approximately 68 fewer people, which would result in a comparable increase in the service population of the City within a quarter-mile of bicycle facilities. Impacts to the access to the bicycle network would be the same and similar to the proposed Project, Alternative 4 would not cause a significant impact related to access to the bicycle network.

Proximity and Quality of the Transit Network Analysis

The proposed Project and Alternative 4 would be located in the same location, within a quarter-mile of multiple transit facilities. The TDF model indicated that the proposed Project would increase service population percentage within a quarter-mile of transit facilities to 66.7 percent. Under Alternative 4, the population of the Project Site would be approximately 68 fewer people, which would result in a comparable increase in the service population within a quarter-mile of transit facilities. Impacts to the access to the transit network would be the same. Similar to the proposed Project, Alternative 4 would not cause a significant impact related to access to the transit network.

Pedestrian Accessibility Analysis

The proximity and quality of pedestrian environment provides a measure of the average walkability in the surrounding area. The Pedestrian Accessibility score is based on the number of land use types accessible to a resident within a 5-minute walk. Any decrease in the existing Pedestrian Accessibility score would indicate a significant impact. The TDF model indicated that the pedestrian accessibility score for the Project would be 3.88. This alternative would not change the pedestrian accessibility score. Therefore, similar to the proposed Project, this alternative would not result in a significant impact.

Overall impacts to transportation and traffic under Alternative 4 would be similar to those for the proposed Project.

Tribal Cultural Resources

Under Alternative 4, the general configuration of the existing uses would remain; however, ground-disturbing activities would occur on the vacant lot and parking lot on the northwest portion of the Project Site. Maintaining the buildings in their existing location would not affect any TCRs; however, the ground-disturbing activities may affect TCRs. Therefore, there would be a potential to disturb or unearth tribal cultural materials, similar to the proposed Project. However, given that no significant and unavoidable impacts to TCRs were identified for the proposed Project, Alternative 4 would not avoid or reduce the severity of significant TCR impacts of the proposed Project. Impacts would be less than significant after mitigation.

Utilities and Service Systems—Water

No construction activities would occur to the existing 173 residential units; however, construction would be required for the additional 106 residential units under Alternative 4. As such, the potential exists for construction activities to generate a temporary water demand during construction. However, given that there would be 28 fewer residential units than the proposed Project, water demand would be less than that for the proposed Project. A total of 106 new residential units would be introduced to the Project Site under this alternative. As such, there would be an increase in water demand from the existing conditions; however, with fewer residential units than the proposed Project, this alternative would have less water demand than would the proposed Project and would not exceed the available water supplies projected by Pasadena Water and Power (PWP), or affect the water distribution network. Therefore, impacts to water supply and infrastructure would be less than the less than significant impacts with the Project.

Utilities and Service Systems—Sewer

No construction activities would occur to the existing 173 residential units; however, construction would be required for the additional 106 residential units under Alternative 4. As such, the potential exists for construction activities to generate a temporary increase in sewage as a result of construction workers on site. However, because there would be 28 fewer residential units than the proposed Project, sewage generation during construction would be less than the proposed Project. A total of 106 new residential units would be introduced to the Project Site under this alternative. As such, there would be an increase in sewage generation from the existing conditions; however, with fewer residential units than the proposed Project, this alternative would have less sewage generation than the proposed Project, and would not affect sewer infrastructure or exceed the combined available capacity for future development at the San Jose Creek WRP. Therefore, impacts would be less than those the proposed Project and less than significant.

Utilities and Service Systems—Solid Waste

No construction activities would occur to the existing 173 residential units; however, construction would be required for the additional 106 residential units under Alternative 4. As such, similar to the proposed Project, there would be a potential for construction activities to generate an increase in solid waste. An additional 106 units would be constructed, 28 units fewer than the proposed Project. As such, there would be a potential to generate additional solid waste during the operation of this alternative; however, the amount generated would be less than that generated for the proposed Project. Therefore, impacts would be less than the proposed Project and less than significant.

Summary of Impacts

Implementation of Alternative 4 would reduce environmental impacts when compared to the proposed Project. As summarized in **Section 4.0, Environmental Impact Analysis**, all potentially significant environmental impacts from the proposed Project can be reduced to less than significant levels with the implementation of mitigation measures; Alternative 4 would not avoid or reduce the severity of any significant and unavoidable impacts. Impacts from Greenhouse Gases would be slightly greater under this alternative when compared to the proposed Project. Fewer impacts to Air Quality, Energy, Parks and Recreation, Population and Housing, and all Utilities and Service Systems would occur under this alternative when compared to the Project. Impacts to Land Use, Noise, Transportation and Traffic, and Tribal Cultural Resources would be comparable under the Alternative 4. A summary of impacts is provided in **Table 5.0-21**.

Relationship of the Alternative to Project Objectives

Alternative 4 would meet some of the Project's objectives, including developing an infill project that would increase residential units; providing new residential opportunities in the Central District TOD area; providing for development that is consistent with the goals of the Pasadena General Plan and the Central District Specific Plan; removing properties from the Fuller Theological Seminary Master Plan and Development Agreement that are not owned by Fuller Theological Seminary; and authorizing development consistent with current land use plans and zoning regulations that have been revised since the Fuller Theological Seminary Development Agreement was executed. All the other Project objectives would not be met.

G. 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.

Table 5.0-21, summarizes the effects of the Alternatives. As shown, the No Project Alternative (Alternative 1) and the Reduced-Density Alternative (Alternative 4) would result in no potentially significant environmental impacts and would result in impacts that would be less than the proposed Project. The No Project Alternative would be the environmentally superior alternative. However, based on the CEQA Guidelines, the EIR shall identify another alternative than the No Project Alternative as environmental superior. Therefore Alternative 4, the Reduced-Density Alternative, is the environmentally superior alternative.

**Table 5.0-21
Project and Alternative Impact Comparison Summary**

Environmental Issue Area	Proposed Project Impacts	Alternative 1 No Project	Alternative 2 Horizontal Mixed-Use	Alternative 3 Vertical Mixed-Use	Alternative 4 Reduced-Density Alternative
Air Quality	Less than Significant	Fewer Impacts (Less than Significant)	Greater Impacts (Less than Significant)	Fewer Impacts (Less than Significant)	Fewer Impacts (Less than Significant)
Energy	Less than Significant	Fewer Impacts (Less than Significant)	Greater Impacts (Less than Significant)	Fewer Impacts (Less than Significant)	Fewer Impacts (Less than Significant)
Greenhouse Gases	Less than Significant	Fewer Impacts (Less than Significant)	Greater Impacts (Potentially Significant)	Greater Impacts (Less than Significant)	Greater Impacts (Less than Significant)
Land Use	Less than Significant	Similar Impacts (Less than Significant)	Fewer Impacts (Less than Significant)	Fewer Impacts (Less than Significant)	Similar Impacts (Less than Significant)
Noise	Less than Significant with Mitigation	Fewer Impacts (Less than Significant)	Greater Impacts (Potentially Significant)	Greater Impacts (Less than Significant)	Similar Impacts (Less than Significant)
Parks and Recreation	Less than Significant	Fewer Impacts (Less than Significant)	Similar Impacts (Less than Significant)	Similar Impacts (Less than Significant)	Fewer Impacts (Less than Significant)
Population and Housing	Less than Significant	Fewer Impacts (Less than Significant)	Similar Impacts (Less than Significant)	Similar Impacts (Less than Significant)	Fewer Impacts (Less than Significant)
Transportation and Traffic	Less than Significant	Fewer Impacts (Less than Significant)	Similar Impacts (Less than Significant)	Similar Impacts (Less than Significant)	Similar Impacts (Less than Significant)
Tribal Cultural Resources	Less than Significant with Mitigation	Fewer Impacts (Less than Significant)	Greater Impacts (Less than Significant)	Similar Impacts (Less than Significant)	Similar Impacts (Less than Significant)
Utilities and Service Systems—Water	Less than Significant	Fewer Impacts (Less than Significant)	Fewer Impacts (Less than Significant)	Fewer Impacts (Less than Significant)	Fewer Impacts (Less than Significant)
Utilities and Service Systems—Sewer	Less than Significant	Fewer Impacts (Less than Significant)	Fewer Impacts (Less than Significant)	Fewer Impacts (Less than Significant)	Fewer Impacts (Less than Significant)
Utilities and Service Systems—Solid Waste	Less than Significant	Fewer Impacts (Less than Significant)	Greater Impacts (Less than Significant)	Fewer Impacts (Less than Significant)	Fewer Impacts (Less than Significant)