

## I. EXECUTIVE SUMMARY

In accordance with California Environmental Quality Act (CEQA) Guidelines (Guidelines) Section 15123, this Draft Environmental Impact Report (EIR) contains a brief summary of the proposed project and its consequences. More detailed information regarding the proposed project and its potential environmental effects are provided in the following sections of this EIR, particularly throughout Section IV, Environmental Impact Analysis.

### A. PROPOSED PROJECT

The 1.95 acre project site (85,136 square feet) is located at multiple addresses on E. Colorado Boulevard and S. Mentor Avenue, on the south side of E. Colorado Boulevard between S. Mentor and S. Lake Avenues. The site is currently occupied with the former Constance Hotel, one-story retail and restaurant uses, and a two-story Bank of America branch with drive-up tellers. A two-story parking structure is also located on the property.

The proposed project involves the renovation of the 65,750 square foot existing former hotel (originally constructed as the Constance Hotel in 1926 and formerly occupied as the Pasadena Manor retirement home), including 3,700 square feet of basement, demolition of existing commercial uses and new development of additional hotel rooms, restaurant, office, retail and limited (five units) residential uses. The three-phased development would renovate the existing structure to provide 136 hotel rooms in the initial phase and add 20 new hotel rooms and 5 residential units as an addition to the existing structure. The project includes an office component (103,410 square feet) and retail/commercial and restaurant space (60,271 square feet). New buildings would be of Type 1 and Type II B construction (existing hotel is Type II B construction) and vary in height up to six stories and 90 feet. The former Constance Hotel building will be renovated and retained within the project. All other existing structures will be removed to accommodate the project. The bank use, and possibly some of the existing retail/restaurant tenants, will also be included within the project. Total development would be approximately 261,305 gross square feet (including the 65,750 square feet renovated former hotel), resulting in a total Floor Area Ratio (FAR) OF 2.97:1, consistent with allowable FAR of 3:1 for seven of the eight site lots, and 2.75:1 for the remaining lot.

### B. OVERVIEW OF THE PLANNING CONTEXT

Prior to preparing this ~~Draft~~ EIR, an Initial Study was prepared for the proposed project and circulated for public review from May 13, 2009 to June 12, 2009. Two public meetings were also held on Wednesday, May 27, 2009 and Wednesday, June 3, 2009 to determine the scope and content of the environmental information to be included in the Draft EIR. This ~~Draft~~ Final EIR includes an analysis of the following environmental issue areas: Aesthetics; Air Quality; Historical Resources, Noise, Transportation and Circulation, and Utilities (Wastewater and Service System and Water Supply Systems). Other possible effects of the project and why these impacts were determined not to be significant are addressed in chapter V of this ~~Draft~~ Final EIR.

The Draft EIR was circulated for a 45-day public review period from July 29, 2010 to September 12, 2010. The public was invited to comment in writing on the information contained in this document. Persons and agencies commenting were encouraged to provide information that they believe is missing from the Draft EIR, or to identify where the information can be obtained.

Additionally, the City of Pasadena held two meetings to solicit comment on the Draft EIR. Specifically, the following City EIR Comment Meetings were held for the Draft EIR:

- Transportation Advisory Commission (TAC) – August 26, 2010
- Historic Officer Hearing (HOH) – September 1, 2010

All oral comments provided at Commission meetings and comment letters received in response to the Draft EIR have been responded to in writing, and a summary of oral comments as well as the comment letters, together with the responses to those comments, are included in this Final EIR in Chapter IX.

The Final EIR and related background materials may also be viewed at the following locations:

- Pasadena Permit Center, 175 North Garfield Avenue;
- Central Library, 285 East Walnut Avenue;
- On-line at:

[http://ww2.cityofpasadena.net/planning/environmental/CUP\\_5209/CUP\\_5209.asp](http://ww2.cityofpasadena.net/planning/environmental/CUP_5209/CUP_5209.asp)

Revisions and clarifications to the EIR made in response to comments and information received on the Draft EIR are indicated by strikethrough or underline text. Additionally, any updates or corrections to documents contained in the Technical Appendices (separate volume) are noted by inclusion of an errata with the respective document or study. City of Pasadena decision-making bodies, including the Hearing Officer, are required to review the Final EIR, public comments received, and the responses to the comments, prior to ruling on the adequacy of the Final EIR and prior to taking action on the proposed project.

### **C. AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED**

Potential areas of controversy and issues to be resolved by the City's decision-makers include those areas where the potential for a significant unavoidable impact has been identified. These areas include: air quality (localized PM<sub>2.5</sub> and PM<sub>10</sub> impacts during all three construction phases), historic resources (Constance Hotel property, specifically, the related Colorado Boulevard storefronts), and traffic (street segments).

### **D. ALTERNATIVES TO REDUCE OR AVOID SIGNIFICANT EFFECTS**

Both the City of Pasadena and State CEQA Guidelines (Section 15126.6) require that an EIR describe a range of reasonable alternatives that would feasibly attain most of the basic project objectives and would avoid or substantially lessen any of the significant environmental effects of the project, but also including a no project alternative. The Guidelines state that only those alternatives necessary to permit a "reasonable choice" are required to be set forth in order to foster meaningful public participation and informed decision making. Based on the analysis of alternatives, an environmentally superior alternative is identified. A complete analysis of the alternatives to the project is provided in Section VI, Alternatives to the Proposed Project, of this EIR.

The following alternatives to the proposed project were evaluated in this EIR and are summarized below:

### *NO PROJECT/RETAIN EXISTING CONDITIONS (ALTERNATIVE 1)*

This alternative is required by Section 15126.6(e) of the CEQA Guidelines and assumes that the proposed project is not developed on the project site and that the site, including the existing bank, existing retail/commercial uses, and the vacant hotel structure are retained for ongoing/future use and occupancy. However, rehabilitation/re-occupancy of the former hotel is considered a possible, if not likely scenario that could occur under No Project conditions as well. Future longer-term development opportunities would also remain open for the entire property.

No new development would occur on the project site with the No Project/Retain Existing Conditions Alternative. However, it is possible ~~(if not likely)~~ that the former Constance Hotel structure could be re-occupied for use as a hotel, similar to that proposed by Phase 1 of the project. The No Project/Retain Existing Conditions Alternative would reduce or avoid most (if not all, in the case of existing conditions remaining as is and the former hotel structure continuing to be vacant) of the significant, less than significant, and significant but mitigated environmental impacts that would occur with the proposed project. Should the former Constance Hotel structure be re-occupied with hotel uses, the alternative would still result in unmitigated street segment impacts at two street segments (i.e., Mentor Avenue between Union Street and Colorado Boulevard and Mentor Avenue between Green Street and Cordova Street) and significant air quality impacts during renovation from exceedances of PM<sub>2.5</sub> and PM<sub>10</sub>. Nevertheless, additional significant impacts to more street segments, a significant intersection impact at Lake Avenue/Walnut Street that requires mitigation and additional air quality impacts during construction of Phases 2 and 3 of the proposed project, would not occur with this alternative. Unlike the proposed project, the existing hotel courtyard would remain and not require re-construction, however, conditions would continue to deteriorate. Similarly, no new construction adjacent to existing historic resources or demolition of any other structures on the property (including historic 1926 storefronts) would occur with the alternative and the less than significant impacts of the proposed project (with mitigation) would be further reduced.

In either instance (whether or not the existing former hotel is re-occupied), no new construction would occur and all associated impacts with those uses would be eliminated. No subdivision of the property or height averaging requests would be needed, nor would various minor Conditional Use Permits for new construction over 25,000 square feet, TOD development and subterranean parking. As discussed in more detail Section VI, Alternatives to the Proposed Project, of this EIR, the No Project/Retain Existing Conditions Alternative is considered to be the environmentally superior alternative in comparison to the proposed project. However, the No Project/Retain Existing Conditions Alternative would meet some, but not all, key objectives of the project and eventual development of the entire property would be expected given the site's location and development potential.

### *PROPOSED PROJECT WITHOUT HEIGHT AVERAGING (ALTERNATIVE 2)*

While the proposed project conforms to the existing CD-5-Central District Zone, and all requested uses and density are similarly permitted, approval of Height Averaging for the new office building as part of the City of Pasadena Design Commission Concept and Final Design is required for the current design. This alternative evaluates how the current design could differ, if Height Averaging was not applied. The alternative assumes the same project program as proposed, but would shift massing of the office building to conform to a maximum 75-foot height, without using averaging across the site to attain an average 75-foot height. Proposed phasing would not change with this alternative.

As the alternative assumes the same project program as proposed, population/use driven impacts would be the same as the proposed project. The only impacts that would change would be physical impacts associated with the massing reconfiguration within the project. Proposed phasing and construction schedule would not change with this alternative, nor would provision of total (650 spaces) and off-site parking (100 spaces at 2 N. Lake). Consequently, the alternative would not reduce any of the environmental impacts of the proposed project, but in limited instances could increase project impacts. Specifically, the alternative could increase the significant unmitigated impact to historical resources by obstructing/encroaching upon the available view of the former Constance Hotel structure (a designated historic resource) and associated open space including the hotel courtyard, in addition to demolition of the existing 1926 storefronts. In all other instances, project impacts would not change including significant unmitigated impacts to air quality during construction, and traffic intersection (mitigated) and segment (unmitigated) impacts. With the exception of the City of Pasadena Design Commission Concept and Final Design Review approval of Height Averaging for the new office building, all discretionary requests would also be the same as with the proposed project. Alternative 2 would not be considered environmentally superior to the proposed project, but would meet many project objectives.

### *REDUCE NEW DEVELOPMENT – HOTEL AND RESIDENTIAL OPTIONS (ALTERNATIVE 3)*

This alternative would reduce total development (converted and new) to approximately 90% of that proposed by the project while still converting the former Constance Hotel structure to the proposed hotel use (156 rooms converted and new) or with 81 multi-family residential units (converted and new). Existing retail space along Colorado Boulevard would also be retained and renovated, with ground floor retail also provided in the former Constance Hotel if converted to residential uses. The proposed office building and associated Phase 2 and 3 restaurant and retail space of approximately 196,000 square feet would be reduced to approximately 154,000 square feet. Total site development and reuse of approximately 261,000 square feet would be reduced to approximately 235,000 square feet. A new parking structure would be built, but unlike the proposed project, it would include above grade parking in addition to on grade and subterranean parking, as well as provision of limited shared parking with 2 N. Lake across Colorado Boulevard. A secondary option to reduce project density could be accomplished by converting the former Constance Hotel structure to 136 hotel rooms as proposed by Phase 1 of the current project program, but similarly reducing other uses within the site as proposed by the alternative. Both options would achieve programs that are approximately 90 percent the density of the currently proposed project. Under both options, the retention of existing retail uses along Colorado Boulevard and the reduction in new development would also allow for the existing hotel courtyard to remain with a new internal paseo that links to the street. The office building would be built to 8 stories and would be approximately 10 feet higher, than the larger office building proposed by the current project.

The alternative reduces both occupancy driven (e.g., traffic, utilities) and physical (e.g., aesthetics, historic resources) impacts of the proposed project, as well as meets or exceeds most project objectives. In particular, the removal of remnant historic fabric present in the 1926 Colorado Boulevard storefronts that would be removed with the proposed project would be retained and integrated into the alternative. Consequently, the alternative (with either the hotel or residential option) would reduce a significant unmitigated impact of the project to historical resources, to a less than significant level. Similarly, significant air quality impacts that would occur with construction would be reduced both in peak day emissions and in overall duration, but would still remain significant and unmitigated with this alternative. Alternative 3 would modestly reduce traffic impacts, but significant impacts would still occur at three street

segments with the hotel option (Mentor Avenue between Walnut Street and Union Avenue, Mentor Avenue between Union Street and Colorado Boulevard, and Mentor Avenue between Green Street and Cordova Street), and at two ~~street~~ segments with the residential option (i.e. Mentor Avenue between Walnut Street and Union Street and Mentor Avenue between Union Street and Colorado Boulevard) ~~would still occur (under the residential option)~~. While overall utility consumption/generation would also be slightly reduced with the alternative, similar improvements and mitigation would be expected to service the mix of uses and overall density on the site. In most other instances, the impacts of the proposed project analyzed in this EIR would not appreciably change. Alternative 3 would be considered environmentally superior to the proposed project, and would meet or exceed many project objectives.

#### *ELIMINATE TRAFFIC IMPACTS/REDUCED PROJECT (ALTERNATIVE 4)*

This alternative would reduce trip generation to a level where significantly impacted street segments would be eliminated (1,712 daily trips or less). As with Alternative 3, this alternative would have residential and hotel options for re-use of the former Constance Hotel structure in an initial project phase, but would reduce new development in subsequent phasing. Existing historical storefronts on Colorado Boulevard could also be retained with this alternative. New office, restaurant and retail space would be substantially reduced compared to the proposed project to achieve trip reductions sufficient to eliminate traffic impacts to intersections and street segments. As with the proposed project, it is presumed that some portion of parking for the alternative could be provided at 2 N. Lake and that as with Alternative 3, on-site parking could be provided by a parking structure with some subterranean levels. Trip generation reductions would be achieved by adjusting project uses across the board. Total site development and reuse of approximately 255,000 square feet would be reduced to approximately 154,000 square feet with the hotel option and 174,000 square feet with the residential option.

The alternative reduces both occupancy driven (e.g., traffic, utilities) and physical (e.g., aesthetics, historic resources) impacts of the proposed project, as well as meets several project objectives. In particular, the historic fabric present in the 1926 Colorado Boulevard storefronts that would be removed with the proposed project would be retained and integrated into the alternative. Consequently, the alternative (with either the hotel or residential option) would reduce a significant unmitigated impact of the project to historical resources, to a less than significant level. Similarly, significant air quality impacts that would occur with construction would be reduced both in peak day emissions and in overall duration, but would still remain significant and unmitigated with this alternative. Alternative 4 would also reduce traffic impacts, including eliminating significant street segment impacts at Mentor Avenue between Walnut Street and Union Street, Mentor Avenue between Union Street and Colorado Boulevard and Mentor Avenue between Green Street and Cordova Street that would otherwise require mitigation. Overall utility consumption/generation would also be reduced with the alternative, although similar improvements and mitigation would be expected to service the mix of uses and overall density on the site. Unlike the proposed project, Alternative 4 would not require approval of height averaging, however, most major entitlements would likely still be required. Given that significant unmitigated impacts to historic resources (1926 storefronts) and traffic (street segments) would be reduced less than significant under the alternative, Alternative 4 would be considered environmentally superior to the proposed project, and would meet some, but not all, project objectives.

## E. PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

### AESTHETICS

#### Environmental Impacts

##### *Scenic Vistas and Resources Impacts*

The proposed project would not result in the destruction of any landmark-eligible trees, stand of trees, rock outcropping or natural feature within or adjacent to a State Scenic Highway and thus, recognized as having significant aesthetic value. However, the former Constance Hotel, which would be renovated and expanded as part of the proposed project, is a historic resource. While not within a State Scenic Highway the hotel could be considered to have aesthetic value as a scenic resource.

The Constance Hotel was evaluated in accordance with the landmark criteria in Title 17 of the Pasadena Municipal Code, and the City Council determined that the building qualifies for designation under Criterion "A" for landmark designation (PMC §17.52.40). While these changes would result in updating of the exterior and views of the structure, the proposed renovations to the hotel would occur in accordance with Section 106 requirements of the National Historic Preservation Act of 1966 (NHPA).

As required by section 17.61.030 of the Pasadena Municipal Code, the design of the proposed project would be reviewed through the City's design review process. This would ensure that the design, colors, and finish materials of the proposed project comply with adopted design guidelines, including the Secretary of the Interior's Standards for Rehabilitation and achieve compatibility with the surrounding area. Therefore, although the proposed project would not substantially degrade or impair known scenic resources or vistas, this regulatory procedure provides the City with additional layer of review for aesthetics and an opportunity to incorporate additional conditions to increase the aesthetic value of the proposed project. As such, the proposed project would have no impacts to state scenic highways or scenic roadway corridors, or other known scenic resources.

##### *Visual Character or Quality Impacts*

#### Street Trees and Landscaping

All but two of the 31 trees internal to the site (a Lemon-scented Gum tree and a Fern Pine tree), would be removed with the project (the five existing street trees would remain and additional street trees would be added). Existing one-story retail uses would be replaced with a five-story structure. Existing surface parking and bank uses would be replaced with a six-story building located adjacent to existing office buildings. Three of the existing trees located on the project site are protected under the City of Pasadena's Tree Protection Ordinance 6896 (TPO) and proposed for removal, therefore requiring a Tree Removal Permit.

After removal of existing trees, 40 additional ornamental trees of various species and sizes would be planted within and around the project over the course of the three project phases. Given that existing trees within the fully developed site are not a predominant aesthetic feature and constitute a small proportion of site coverage, that the proposed project would broaden the existing landscape palette, and that the project would add three new street trees on Mentor Avenue and an additional street tree on Colorado Boulevard, the reduction in existing coverage

within the site is not considered to be a significant aesthetic impact. Consequently, changes in landscaping resulting from the proposed project on this fully developed and urbanized site would not result in a significant impact to visual character or quality.

### Views

Generally, the proposed development would increase density and massing on the project site. However, the massing and heights of the proposed structures would be consistent with the existing structures in the project area, and the proposed project would be in compliance with height requirements of the Specific Plan.

The proposed hotel addition would be compatible in height and scale with the Constance Hotel and with other uses located along Mentor Avenue. The hotel addition would be located directly opposite of the historic four-story multi-residential building located along Mentor Avenue. Project height and scale would be compatible with the historic structure. Also, lighting associated with the proposed structure would not be directed towards adjacent uses. The City of Pasadena Design Commission would make final approvals regarding the design and compatibility of the proposed project as it would relate to historic structures in the area.

The proposed project would replace existing one-story retail uses, a Bank of America structure and associated parking with two-story retail and restaurant uses, as well as a larger, taller 6-story office structure. ~~The proposed building would be almost built to 90 feet in height and include retail and restaurant uses.~~ The proposed structure would be the largest building constructed under the project. Although development of the structure on the project site would increase massing and scale of the site, its location along Colorado Boulevard and proximity to other mid-rise office buildings would be compatible with the scale of development in the surrounding area. An office building similar in scale and massing is located adjacent to the project site. A high-rise building is located directly opposite the site along Colorado Boulevard. Therefore, the proposed project would be aesthetically compatible with surrounding uses with respect to massing and scale.

Pedestrian level views of both the San Gabriel Mountains and the Verdugo Mountains are partially available from public rights of way within the project area. However, these views are currently obstructed by mid-rise development that currently exists in the surrounding area. View lines through the project site could be reduced as the proposed project would replace existing uses that are primarily one-story in height with 6 and 7-story structures. However, since there are no scenic resources that are presently available in view lines from public rights of way through the project site, no scenic views would be obstructed. Therefore, impacts associated with the obstruction of pedestrian views would be less than significant. Accordingly, changes to views from the project as preliminarily designed herein would not result in a significant impact to visual character or quality.

### **Shade and Shadow Impacts**

During the summer solstice the greatest shadows would be cast during the morning period towards the west in the direction of Lake Avenue. These shadows would be cast on adjacent commercial uses and would decrease in length throughout the day. Specifically, the two-story office building located at Lake Avenue and Colorado Boulevard would be shaded in the morning hours between 9:00 a.m. and 11:00 a.m. No other buildings, including the multi-residential building located adjacent to the project site along Mentor Avenue would be shaded during the

morning hours. As no shadows would be cast over sensitive uses, no significant environmental impacts from shade and shadow are anticipated to occur during the summer solstice.

Shadows during the winter solstice would be cast to the northwest in the morning hours and move clockwise towards the day. Only in the 9:00 a.m. hour would the shadows just reach the two-story commercial building located at Colorado Boulevard and Lake Avenue. During this time shadows would extend across portions of both Lake Avenue and Colorado Boulevard. By 10:00 a.m. the shadows would have moved in a clockwise direction, thereby not covering any adjacent structure.

Though these shadows would be cast east of the site in the latter part of the day, they would not reach the four-story multi-family residential building located along Mentor Avenue. The two-story retail uses located north of the project site along Colorado Boulevard would be shaded in the afternoon hours as would two-story retail and parking uses located along Mentor Avenue. These uses would be shaded for less than four hours and are not considered shade sensitive uses. Because the shade-sensitive residential uses to the east would not be shaded, no shadow-sensitive uses would be significantly impacted by the proposed project during the winter solstice.

In the morning hours of the Spring/Fall equinoxes, shadows from proposed buildings would be cast on Lake Avenue and the two-story office building located at Colorado Boulevard and Lake Avenue. The building would be shaded for approximately one hour. No other buildings located in the area would be shaded as a result of the proposed project during the morning hours of the Spring/Fall equinoxes.

Shadows would be minimal during the afternoon hours during the Spring/Fall Equinoxes. Only in the late afternoon hours would parking uses located along Mentor Avenue, east of the project site be shaded. At no time would the multi-family residential building located next to the parking uses be shaded as a result of the proposed project. Therefore, no sensitive uses would be shaded during the afternoon hours during the Spring/Fall equinoxes. No significant environmental shade/shadow impacts are anticipated to occur.

### **Lighting and Illumination Impacts**

Lighting for the proposed project would include a continuation of security, landscaping, and perimeter (street) lighting that already exists on site and that is typical of the project area. All such lighting would be of low-scale and directed and/or shielded away from adjacent uses to limit light spillover effects. The proposed outdoor restaurant and courtyard areas would also include security, landscape and functional lighting. Similarly, the proposed lighting would be compatible with lighting in the surrounding area, would not be directed towards adjacent uses and would not constitute intrusive high intensity lighting in an otherwise sensitive context. In addition, the proposed project would not use highly reflective building materials. Glare from the proposed structure is not anticipated along Mentor Avenue. While the proposed 35-foot atrium at Lake Avenue and Colorado Boulevard would be largely glass enclosed, it would be built with glass of low reflectivity (as would all glass/windows in the project), which would minimize any potential adverse glare effects.

Project lighting plans, as well as exterior finish, colors, and materials would be closely evaluated through the City's design review process, which would further ensure that project lighting would be sensitive to, and compatible with the surrounding community. This regulatory procedure

provides the City with an opportunity to incorporate additional conditions to improve the projects building materials and lighting features.

Implementation of the proposed project would result in increased lighting from the project site and in the immediate area. However, with implementation of the mitigation measures, the proposed project would not create a new source of light or glare that would adversely affect day or nighttime views in the area. This would be considered a less than significant environmental impact with mitigation incorporation.

### **Mitigation Measures**

#### *Scenic Vistas and Resources*

No mitigation measures are required.

#### *Visual Character*

No mitigation measures are required.

#### *Shade and Shadow*

No mitigation measures are required.

#### *Lighting and Illumination*

- IV.A-1 All lighting along the perimeter of the site, particularly street lamps, shall be focused on the project site and oriented in a manner that will prevent spillage or glare into surrounding uses. Lighting shall be energy-efficient and shielded so that direct glare and reflections are confined to the maximum extent feasible within the building site, and shall be directed downward and away from adjoining properties and public rights-of-way. All proposed exterior (safety, landscape and signage) lighting shall comply with the outdoor lighting standards in the City of Pasadena Zoning Code.
- IV.A-2 The proposed project shall comply with the City's lighting regulations included in the Zoning Code, which limit the reflectivity of architectural materials used to reduce any adverse impacts from window glass glare.
- IV.A-3 Construction equipment staging areas shall use and maintain appropriate screening (i.e., temporary fencing with opaque material) to buffer views of construction equipment and material to the adjacent land uses. Any construction-related lighting shall include shielding in order to direct lighting down and away from adjacent residential and commercial areas.

### **Level of Significance after Mitigation**

Project impacts on the environment related to scenic vistas, aesthetics, visual character and shade and shadow are anticipated to be less than significant. Project impacts on the environment from lighting and illumination are anticipated to be less than significant with mitigation. Therefore, no significant environmental impact or significant unavoidable environmental impact associated with these issues would result from the development of the proposed project.

## AIR QUALITY

### Environmental Impacts

#### Construction Impacts

##### Phase I Unmitigated Regional Construction Emissions

Phase 1 daily construction emissions for NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> would not exceed the SCAQMD regional thresholds. However, daily construction emissions for VOC would exceed the SCAQMD regional thresholds, and Phase 1 regional construction emissions would result in a significant impact without mitigation.

##### Phase II Unmitigated Regional Construction Emissions

Phase II daily construction emissions would not exceed the SCAQMD regional thresholds. Phase 2 regional construction emissions would result in a less-than-significant impact without mitigation.

##### Phase III Unmitigated Regional Construction Emissions

Phase 3 daily construction emissions for NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> would not exceed the SCAQMD regional thresholds. However, daily construction emissions for VOC would exceed the SCAQMD regional thresholds, and Phase 3 regional construction emissions would result in a significant impact without mitigation.

##### Phase I Unmitigated Localized Construction Emissions

Phase 1 localized construction emissions for NO<sub>x</sub> and CO would not exceed the SCAQMD regional thresholds. However, daily construction emissions for PM<sub>2.5</sub> and PM<sub>10</sub> would exceed SCAQMD localized thresholds (primarily from construction equipment emissions), and Phase 1 would result in a significant impact without mitigation.

##### Phase II Unmitigated Localized Construction Emissions

Phase 2 localized construction emissions for NO<sub>x</sub> and CO would not exceed the SCAQMD regional thresholds. However, daily construction emissions for PM<sub>2.5</sub> and PM<sub>10</sub> would exceed SCAQMD localized thresholds (from both construction equipment emissions and grading), and Phase 2 would result in a significant impact without mitigation.

##### Phase III Unmitigated Localized Construction Emissions

Phase 3 localized construction emissions for NO<sub>x</sub> and CO would not exceed the SCAQMD regional thresholds. However, daily construction emissions for PM<sub>2.5</sub> and PM<sub>10</sub> would exceed the SCAQMD localized thresholds (from both construction equipment emissions and grading), and Phase 3 would result in a significant impact without mitigation.

#### Toxic Air Contaminant Impacts

Given the short-term construction schedule of approximately 38 months, the proposed project would not result in a long-term (i.e., 70 years) source of TAC emissions. No residual emissions

and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period (38 out of 840 months), project-related construction TAC emission would result in a less-than-significant impact.

### Odors

Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the immediate area surrounding the project site. The proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Proposed project construction would not cause an odor nuisance. Construction odors would result in a less-than-significant impact.

### *Operational Impacts*

Operational emissions were estimated for each of the three phases and each phase was compared to the SCAQMD significance thresholds for informational purposes. The final conclusion of significance is based on total development of all three phases. Regional operational emissions associated with total development would not exceed significance thresholds, and would result in a less-than-significant impact.

The SCAQMD recommends a CO hotspot evaluation of potential localized CO impacts when V/C ratios are increased by two percent at intersections with a LOS of D or worse. SCAQMD also recommends a CO hotspot evaluation when an intersection decreases in LOS by one level beginning when LOS changes from C to D. All Phase 1 and 2 intersections would operate at an acceptable level of service according to the SCAQMD screening guidance, and further analysis is not necessary. The Lake Avenue/Walnut Street intersection would degrade from LOS E to LOS F in Phase 3 and a detailed CO hotspot analysis is required. The one-hour CO concentration at the Lake Avenue/Walnut Street intersection would be 5 ppm at worst-case sidewalk receptors. The eight-hour CO concentration would be 3.7 ppm. The State one- and eight-hour standards of 20 and 9.0 ppm, respectively, would not be exceeded at the analyzed intersections. Localized CO concentrations would result in a less-than-significant impact.

### Toxic Air Contaminant Impacts

The proposed project would develop a mix of land uses including residential, retail, and commercial space. These typical urban land uses are not anticipated to generate a substantial number of daily truck trips. The primary source of potential TACs associated with project operations is diesel particulate from delivery trucks (e.g., truck traffic on local streets and on-site truck idling). Generally, less than five heavy-duty trucks (e.g., delivery trucks) would access the project site on a daily basis, and the trucks that do visit the site would not idle on-site for extended periods of time. Based on the limited activity of these TAC sources, the proposed project would not warrant the need for a health risk assessment associated with on-site activities, and potential TAC impacts are expected to be less than significant.

### Odor Impacts

The project site would not be developed with land uses that are typically associated with odor complaints. On-site trash receptacles would have the potential to create adverse odors. Trash receptacles would be located and maintained in a manner that promotes odor control, and no adverse odor impacts are anticipated from these types of land uses. Therefore, the proposed

project would not result in activities that create objectionable odors. No significant impacts would occur.

The proposed project would include restaurant space. While there is a potential for odors to occur, compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential restaurant objectionable odor impacts to a less-than-significant level.

#### *Consistency with the Air Quality Management Plan*

The SCAQMD has indicated that a project is consistent with the 2007 AQMP if the proposed project is consistent with the applicable General Plan's land use zoning. The Central District Specific Plan, approved by the City Council on November 8, 2004, contains the recommended heights, setbacks, floor area ratios and residential densities for projects in the Central District. These development standards are implemented by the Zoning Code. The proposed project is well within the permitted densities and allowable uses for the site under Zoning Code, and would not require a general plan amendment. Consistency with the AQMP would result in a less-than-significant impact.

#### *Global Climate Change*

Greenhouse gas (GHG) emissions were calculated for on-road mobile vehicle operations, general electricity consumption, electricity consumption associated with the use and transport of water, natural gas consumption, and solid waste decomposition. Estimated GHG emissions would be less than the 10,000 metric tons of CO<sub>2</sub>e per year quantitative significance threshold.

The proposed project would be required to comply with LEED standards that exceed standard building and construction practices. The estimation of GHG emissions was based on standard electricity consumption, natural gas consumption, and average daily trips did not account for reductions that would be associated with a LEED design. It would be speculative to assign additional reductions without a method of quantifying reductions for the project; however it is plausible that the project's estimated GHG emissions would be further reduced due to LEED design enhancements.

The proposed project would comply with the applicable greenhouse gas reduction plans, including: CAT Greenhouse Gas Reduction Strategies, Attorney General Greenhouse Gas Reduction Measures, and the City's 2009 Green City Action Plan.

It should also be noted that the global climate change would not be expected to have a substantial impact on the project. The project location would not be affected by minor changes in sea level and the project would not require a substantial volume of water resources so any changes in available water resources (resulting from climate change) would not have a substantial effect on the viability of the project. The proposed project would not contribute to a cumulative considerable greenhouse gas and climate change impact.

## Mitigation Measures

### Construction

Mitigation Measures IV.B-1 through IV.B-7 would ensure compliance with SCAQMD Rule 403. These mitigation measures shall be implemented for all areas (both on-site and off-site) of construction activity.

- IV.B-1 The construction area and all accessible areas (public streets, sidewalks, etc.) within 100 feet of the project site shall be swept (preferably with water sweepers) and watered at least twice daily.
- IV.B-2 The construction contractor shall utilize at least one of the following measures at each vehicle egress from the project site to a paved public road:
- Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long;
  - Pave the surface extending at least 100 feet and at least 20 feet wide;
  - Utilize a wheel shaker/wheel spreading device consisting of raised dividers at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages; or
  - Install a wheel washing system to remove bulk material from tires and vehicle undercarriages.
- IV.B-3 Site access points shall be swept/washed within thirty minutes of visible dirt deposition. Street sweepers that comply with SCAQMD Rule 1186 and 1186.1 shall be used to sweep site access points or reclaimed water shall be used to wash site access points.
- IV.B-4 All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).
- IV.B-5 Construction activity on unpaved surfaces shall be suspended when winds exceed 25 miles per hour.
- IV.B-6 Heavy-duty equipment operations shall be suspended during first and second stage smog alerts.
- IV.B-7 Ground cover in disturbed areas shall be replaced as quickly as possible.
- IV.B-8 The construction contractor shall utilize super-compliant architectural coatings as defined by the SCAQMD (VOC standard of less than ten grams per liter).
- IV.B-9 The construction contractor shall utilize materials that do not require painting, as feasible.
- IV.B-10 The construction contractor shall use pre-painted construction materials, as feasible.

IV.B-11 All diesel-powered construction equipment in use shall require control equipment that meets Tier III emissions requirements. In the event Tier III equipment is not available, diesel powered construction equipment in use shall require emissions control equipment with a minimum of Tier II diesel standards.

IV.B-12 The construction contractor shall utilize electricity from power poles rather than temporary gasoline or diesel power generators.

### *Operation*

Operational air quality impacts would be less than significant, and no mitigation measures are required.

### **Level of Significance after Mitigation**

#### *Construction*

Implementation of Mitigation Measures IV.B-1 through IV.B-7 would ensure that fugitive dust emissions would be reduced by approximately 61 percent.

#### Phase 1 Mitigated Emissions

Unmitigated Phase 1 emissions would result in a regional VOC impact and localized PM<sub>2.5</sub> and PM<sub>10</sub> impacts. The SCAQMD has identified super-compliant architectural coatings that have a VOC standard of less than ten grams per liter. Mitigation Measure IV.B-8 would reduce project-related architectural coating emissions by 96 percent. Phase 1 architectural coating emissions would be reduced to 12 pounds per day, which would be less than the 75 pounds per day significance threshold. Mitigation Measures IV.B-9 and IV.B-10 would also reduce VOC emissions. Mitigation Measures IV.B-11 and IV.B-12 would reduce localized particulate matter emissions from fuel combustion. However, particulate matter emissions would remain above the significance thresholds. Mitigated Phase 1 emissions would result in a less-than-significant regional VOC impact but significant and unavoidable localized PM<sub>2.5</sub> and PM<sub>10</sub> impacts.

#### Phase 2 Mitigated Emissions

Unmitigated Phase 2 emissions would result in localized PM<sub>2.5</sub> and PM<sub>10</sub> impacts. Mitigation Measures IV.B-11 and IV.B-12 would reduce localized particulate matter emissions from fuel combustion. However, particulate matter emissions would remain above the significance thresholds. Mitigated Phase 2 emissions would result in a less-than-significant regional VOC impact but significant and unavoidable localized PM<sub>2.5</sub> and PM<sub>10</sub> impacts.

#### Phase 3 Mitigated Emissions

Unmitigated Phase 3 emissions would result in a regional VOC impact and localized PM<sub>2.5</sub> and PM<sub>10</sub> impacts. Mitigation Measure IV.B-8 would reduce Phase 3 architectural coating emissions to 19 pounds per day, which would be less than the 75 pounds per day significance threshold. Mitigation Measures IV.B-9 and IV.B-10 would also reduce VOC emissions. Mitigation Measures IV.B-11 and IV.B-12 would reduce localized particulate matter emissions from fuel combustion. However, particulate matter emissions would remain above the significance thresholds. Mitigated Phase 3 emissions would result in a less-than-significant regional VOC impact but significant and unavoidable localized PM<sub>2.5</sub> and PM<sub>10</sub> impacts.

### *Operation*

The project-related operational emissions would result in a less-than-significant impact without mitigation.

## *HISTORICAL RESOURCES*

### **Environmental Impacts**

#### *Constance Hotel Rehabilitation*

The proposed project would retain and restore significant character-defining features of the Constance Hotel tower's exterior. The project would remove incompatible alterations and substantially restore the tower's exterior to its original appearance, including replication of documented but missing exterior features. The proposed project would also include substantial alterations to the interior of the historic hotel tower. The primary spaces, circulation pattern, features, and finishes of the main level lobby would be substantially retained and restored.

Rehabilitation would require the removal of all original, structurally unsound, hollow clay tile and gypsum block partitions, and also original doors and frames, wood trims, ceramic tile, and plumbing fixtures and fittings. The proposed exterior work on the hotel tower would retain and repair the significant character-defining features of the tower's façades. Important character-defining interior features would also be retained in the ground-floor lobby spaces. The demolition of original interior materials, features, and spatial configurations on the upper floors of the building would result in the loss of those character-defining features. The hotel tower, however, would continue to convey its historic significance despite this loss, and the demolition of interior features in the private spaces on the 2<sup>nd</sup> through 7<sup>th</sup> floors would not result in a significant adverse affect.

During the first phase of the proposed project, the courtyard would be retained. In subsequent phases, however, the courtyard would be demolished in order to construct a subterranean parking facility. Selected architectural features of the courtyard would be salvaged, stored, rehabilitated, and reinstalled in a reconstructed courtyard. Despite the efforts to salvage selected character-defining features, the demolition and reconstruction of the courtyard would result in a significant loss of character-defining features. Without mitigation, demolition and reconstruction of the courtyard would result in a substantial adverse effect to the historic hotel tower.

#### *Demolition of Storefronts*

The proposed project would demolish the 1926 multi-storefront building and the parking garage in order to allow for new construction on the site. Both buildings are related to the Constance Hotel and date from the Hotel's period of significance. The demolition of these buildings would alter the hotel's historic setting. Historic spatial relationships among the three buildings would no longer exist. Demolition of the parking garage would also obscure the fact that the original design included accommodation of automobiles. The demolition of the portion of the 1926 storefront building that contains the hotel's original dining room would remove a significant character-defining space that remained in use as the hotel's dining room until its recent adaptive reuse for a retail tenant.

The exterior of the 1926 multi-storefront building is substantially intact below later additions, though its interiors other than the original dining room have sustained significant alterations and do not retain integrity of design, materials, workmanship, feeling, or association. As such, the multi-storefront building is a historic resource. The Constance Hotel tower and courtyard would not continue to be eligible for listing in the National Register of Historic Places and convey their historic associations with the demolition of this related building. Therefore, demolition of the 1926 multi-storefront building would result in a significant adverse effect to historic resources on the site.

Similarly, as the 1926 multi-storefront building in its current condition appears individually eligible for listing in the California Register, and therefore does appear to qualify as an historical resource under CEQA, its demolition would result in a significant adverse effect on historic resources on the site.

### *Proposed New Construction*

#### Design of Addition and Adjacent New Construction

The design of the addition to the hotel tower and the adjacent new construction would have the potential to disrupt or distract from the historic character of the complex. Design issues are referenced in Standards 9 and 10 of the Secretary of the Interior's Standards. As planned, all new construction would be designed as separate elements that potentially could be removed in the future, with minimal impact to the Constance Hotel tower.

#### Location, Scale, and Massing of Additions and Adjacent New Construction

Because the Constance Hotel tower has been the tallest building on the block to date, the prominent vertical massing of the new tower would alter the hotel tower's historic setting.

The taller volumes of the new construction would be set back from Colorado Boulevard towards the southwestern corner of the site leaving substantial space between the original hotel tower and the newly constructed tower. Vistas and view corridors to and from the Constance Hotel tower from along Colorado Boulevard, would be maintained and the hotel tower's Mentor Avenue elevation would remain unchanged.

The alteration of the hotel tower's setting through construction of a new mixed-use tower, and the location, scale, and massing of new construction would not result in a significant adverse affect to historic resources on the site.

### **Analysis of the Project Using the Secretary of the Interior's Standards**

The project, prior to mitigation, would meet the Secretary of the Interiors Standards, except as follows.

*Standard 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.*

Without mitigation to protect more of the hotel's historic character, the project would not meet Standard 2.

*Standard 5: Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

Without mitigation to preserve more distinctive examples of craftsmanship, the proposed project would not conform to Standard 5.

*Standard 6: Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

Demolition of the multi-storefront retail building does not meet Standard No. 6.

*Standard 8: Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

The proposed project would conform to Standard 8 if archaeological resources are protected and preserved in place. If any resources are to be disturbed, mitigation measures must be undertaken.

#### *Impacts to Adjacent Structures*

Subsequent review by the City of Pasadena Design Commission during the approval process is required. As a subsequent discretionary action in the approval process, the Design Commission will be asked to find that there are no changed circumstances or new information that would require further CEQA review of the project, based on the proposed design. In order to make that finding, the Design Commission has the authority to require changes to the future design of the new construction so that the final design does not have an unmitigable significant impact on historic resources. For that reason, subsequent design review would ensure that the new construction would have no significant impact to adjacent structures.

#### **Mitigation Measures**

IV.C-1 The Constance Hotel and related buildings shall be photographed according to HABS standards for photography prior to any demolition, abatement or rehabilitation work. Views shall include all exterior elevations for each building, important interior features, key spatial relationships among buildings, and exterior hardscape features. These photos will also serve as graphic documentation for the Historic Structures Report described in mitigation measure IV.D-2. The negatives and archival quality prints will be donated to the Pasadena Public Library.

IV.C-2 A Historic Structures Report (HSR) shall be prepared which will include all the original components of the Constance Hotel property (hotel tower, courtyard, one-story retail building, and garage). The HSR will provide documentary, graphic, and physical information about both the property's history and its existing condition including a reproduction of the hotel's original drawings. Measured drawings of as-found conditions are not required. The report will also include appropriate methods for treatment of the existing historic fabric, a recommended scope of work, and provide information and recommendations for further treatment. This report will be prepared according to the National Park Services *Preservation Brief 43: The Preparation and Use of Historic*

*Structures Reports.* A copy of this report will be donated to the Pasadena Public Library.

- IV.C-3 The exterior rehabilitation of the Constance Hotel tower will follow the Secretary of the Interior's Standards and have specifications for the treatment of character defining features as identified in the HSR contained in the general specifications for the project. The specifications will include (but are not limited to), sections for treatment of historic fabric; quality control; substitution procedures; demolition; selective removal and storage of historic materials; protection, patching, and cleaning; determination of repair options and potential replacement of severely deteriorated features. Materials conservation plans shall be incorporated into the plans and specifications if necessary.
- IV.C-4. Original character-defining features on the exterior of the Constance Hotel tower and certain courtyard features (glazed tile and flagstone paving) will be substantially retained and rehabilitated according to the Secretary of the Interior's Standards in order to ensure that all remaining historic fabric is appropriately treated and returned to its original appearance wherever possible.
- IV.C-5 The historic Constance Hotel courtyard will be partially salvaged through the removal of distinctive features that are examples of craftsmanship, reconstructed to substantially replicate the existing form and finish, and the salvaged features shall be reinstalled in their original locations. The features that shall be salvaged intact, using such expertise and care as is necessary for intact removal without loss and damage, are (a) glazed ceramic tiles at the fountain pool and glazed ceramic tile panels on the concrete walls, and (b) flagstone pavers. In addition to the HABS photographs that shall be provided, the courtyard shall be documented by measured drawings of the floor plan and north, east, south, and west elevations to HABS standards prior to demolition. The reconstructed courtyard shall match the demolished courtyard in size, shape, form, material, and finish, as documented by the HABS photographs and measured drawings. The features that shall be replicated accurately include the footprint of the walls, planters, and fountain, and materials such as the board-formed poured-in-place concrete walls. The only aspect that may vary in the replicated courtyard is the finished elevation of the flagstone pavers, which will be raised to accommodate the parking structure below and matching the elevation to the interior first floor level to accommodate wheelchair users without the need to add a ramp and railing at the loggia such as occurred at the existing incompatible addition.
- IV.C-6 There are potential construction impacts that are mitigated to a less than significant level by monitoring by a qualified professional. These impacts are demolition of buildings and landscaping, shoring, excavation, new buildings below and above grade near and attached to historic resources on the site, ~~and temporary shoring to mitigate weaknesses of interior removals and additional seismic risk that occur only during the construction phase.~~ A structural engineer with qualifications in completed historic preservation projects that conform to the Secretary of the Interior's Standards for Rehabilitation will be consulted and provide monitoring and written review of the engineering and construction of work that is on site and contiguous with historic resources that are to remain to ensure that the work being done is consistent with the Standards. If the engineer concludes that the work being done is not consistent with the Standards, the engineer shall give immediate verbal notice to the owner and contractor, followed by written notice of non-conformance. If there is no satisfactory response within one calendar week, then the engineer shall notice the City's mitigation monitor

immediately, verbally, followed in writing and the City shall take any action as may be necessary to halt the work until such consistency is re-established.

- IV.C-7 A historic preservation professional with qualifications in completed historic preservation project that conform to the Secretary of the Interior's Standards for Rehabilitation will be consulted and provide monitoring and written review of the work that is related to historic preservation to ensure that the work being done is consistent with the Standards. If the historic preservation professional concludes that the work being done is not consistent with the Standards, they shall give immediate verbal notice to the owner and contractor, followed by written notice of non-conformance. If there is no satisfactory response within one calendar week, then the historic preservation professional shall notice the City's mitigation monitor immediately, verbally, followed in writing and the City shall take any action as may be necessary to halt the work until such consistency is re-established. This professional shall meet the Secretary of the Interior's professional qualifications standards for a historic architect.
- IV.C-8 Using materials gathered for mitigation measures IV.C-1 and 2, an interpretive program including photographic exhibits and written descriptions shall be developed to chronicle the history of the site, original configurations, architects, technological innovations, and uses. These materials shall be placed in the historic hotel tower building at a location that is reasonably accessible to the general public.
- IV.C-9 Archaeological monitoring shall be conducted by a qualified archaeologist in all areas of grading or ground alterations on the project site. The archaeological monitor shall have the authority to halt any activities impacting potentially significant archaeological resources and the monitor/archaeological consultant must be permitted to adequately evaluate the find in accordance with CEQA criteria. In the event potentially significant archaeological materials are encountered, work shall be stopped immediately or redirected until the significance of the find can be evaluated. If materials are found to be significant, measures must be taken to preserve such materials in place or relocate the material off site for further study.

### **Level of Significance after Mitigation**

With implementation of the mitigation measures listed above, the project would result in adverse affects to the Constance Hotel property (specifically, the related Colorado Boulevard storefronts) such that it will no longer convey its historic significance. Implementation of the mitigation measures would not reduce impacts to historic resources to a less-than-significant level and the Constance Hotel would likely not continue to remain eligible for the California Register of Historical Resources and the National Register of Historic Places. Consequently, the project as currently proposed, would have a significant and unmitigated impact to historical resources, even with preservation of the former Constance hotel tower and related elements including the hotel courtyard.

## NOISE AND VIBRATION

### Environmental Impacts

#### *Construction Impacts*

Construction of the proposed project would result in temporary increases in ambient noise levels in the project area on an intermittent basis. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. The highest noise levels are expected to occur during the grading/excavation and finishing phases of construction.

Ambient noise levels during construction would range from 56.2 to 86.7 dBA  $L_{eq}$ . The highest construction-related noise increase would occur at the multi-family residences directly east of the project site, across Mentor Avenue. However, general construction equipment noise levels would not exceed the 85-dBA at 100 feet significance threshold. Construction activity would result in a less-than-significant noise impact.

Pile driving activity would potentially occur during the construction process. The ambient noise levels during pile driving activity would range from 64.2 and 98.7 dBA  $L_{eq}$  at sensitive receptors in the project vicinity. Although temporary and intermittent, pile driving noise levels would exceed the 85-dBA at 100 feet significance threshold. Pile driving noise would result in a significant noise impact without mitigation.

#### *Operational Impacts*

##### Vehicular Noise

The greatest project-related noise increase after the completion of Phase 1 would be 0.6 dBA CNEL, after the completion of Phase 2 would be 0.5 dBA CNEL, and after the completion of Phase 3 would be 1.1 dBA CNEL. All three noise levels for each of the three project phases would occur along Mentor Avenue between Colorado Boulevard and East Green Street.

Mobile noise generated by the proposed project would not cause the ambient noise level measured at the property line of the affected uses to increase by 3 dBA CNEL to or within the “normally unacceptable” or “clearly unacceptable” category or any 5-dBA or more increase in noise level. The proposed project would result in a less-than-significant mobile noise impact.

##### Stationary Noise

The proposed project would include various pieces of equipment (e.g., air handlers, exhaust fans, kitchen grease exhaust systems, and pool equipment) located in the mechanical areas of the project site. The majority of these noise sources would be located within equipment enclosures and screened from view to comply with Section 9.36.090 of the PMC. Cooling towers would be located on the southern portion of the project site. The nearest land use would be a multi-family residences located approximately 217 feet east of the cooling tower. This residential use would experience a 0.6-dBA increase in ambient noise from noise generated by the cooling tower. This incremental increase would not be audible, and the cooling tower would result in a less-than-significant impact.

The specific location of other stationary noise sources was not known at the time of this analysis. The sources would generally be located central to the project site and away from sensitive receptors. Proposed development would typically shield mechanical equipment from off-site land uses and all mechanical equipment would comply with the regulations set forth in the Municipal Code. Based on the above analysis, stationary noise would result in a less-than-significant impact.

#### Outdoor Activity Noise

The proposed project would include a rooftop pool on the southeastern portion of the project site. The pool area would generate an exterior noise level of 54.5 dBA at the multi-family residences. This incremental increase would not be audible, and the pool area noise would result in a less-than-significant impact.

Outdoor restaurant space would largely be located on the second (terrace) level. The restaurant seating would generate a similar noise level as the pool area. Based on location, the restaurant seating noise levels would be less than the pool area noise levels presented above at sensitive receptors, and would result in a less-than-significant impact.

#### Parking Noise

Parking for Phase 1 would be provided by a valet service utilizing a structure at 2 North Lake Avenue. Mobile noise would result in a maximum mobile noise increase of 1.1 dBA along these roadway segments. This increase would result in a less-than-significant impact.

The highest ambient noise increase due to parking activity noise during Phase 2 would occur at the multi-family residences along Mentor Avenue, located approximately 65 feet east of the project boundary. This residential use would experience a 1.6-dBA increase in ambient noise from noise generated at the parking structure. This would not exceed the 5-dBA threshold for operational noise. All other nearby sensitive uses would experience ambient noise level increases below the 5-dBA threshold from parking activity noise. Parking activity noise would result in a significant and unavoidable impact without mitigation.

Phase 3 construction would complete the subterranean parking garage. Subterranean parking noise would be inaudible at sensitive receptors.

#### Loading Activity and Delivery Truck Noise

The proposed project would include one loading dock for delivery trucks located in the rear of the buildings near the south side of the project site. Loading activity would not increase ambient noise level by more than 5 dBA at sensitive receptors, and would result in a less-than-significant impact.

#### *Ground-Borne Vibration*

#### General Construction Activity

Construction activity would occur adjacent to two commercial buildings located south of the project site. Construction equipment would typically generate a vibration level of 1.0 inches per second at these land uses. The 1.0 inches per second vibration level would exceed the 0.5

inches per second significance threshold, and off-site vibration would result in a significant impact without mitigation.

General construction equipment would generate a vibration level of 1.0 inches per second at a distance of five feet. This would exceed the 0.12 inches per second significance threshold, and vibration levels at the former Hotel Constance would result in a significant impact without mitigation.

### Pile Driving Activity

The proposed project may require drilled or driven piles. Impact pile driving would generate a vibration level of 7.2 inches per second at both off-site sensitive receptors and the former Hotel Constance, which would exceed the potential fragile building damage thresholds of 0.5 and 0.12 inches per second, respectively. Vibration levels associated with pile driving equipment would result in a significant and unavoidable impact without mitigation.

### Operational Impacts

The proposed project would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. However, similar to existing conditions, project-related traffic vibration levels would not be perceptible by sensitive receptors. Thus, operational vibration would result in a less-than-significant impact.

## **Mitigation Measures**

### *Construction Noise*

- IV.D-1 All residential units located within one-quarter mile of the construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 feet shall also be posted at the construction site. All notices and the signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.
- IV.D-2 A “noise disturbance coordinator” shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within one-quarter mile of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.
- IV.D-3 The construction contractor shall utilize caisson drilling instead of pile driving on the project site.

### *Construction Ground-Borne Vibration*

- IV.D-4 Prior to commencement of construction activity, a qualified structural engineer shall survey the existing foundation and other structural aspects of the former Hotel Constance and 45 N. Mentor Avenue (subject to property owner granting access to

conduct the survey). The survey shall provide a shoring design to protect the identified land uses from potential damage. Pot holing or other destructive testing of the below grade conditions may be necessary to establish baseline conditions and prepare the shoring design. The qualified structural engineer shall hold a valid license to practice structural engineering in the State of California and have a minimum of ten years specific experience rehabilitating historic buildings and applying the Secretary's Standards to such projects.

IV.D-5 The qualified structural engineer shall submit a pre-construction survey letter establishing baseline conditions at the former Hotel Constance and the buildings located adjacent and to the south of the project site. These baseline conditions shall be forwarded to the lead agency and to the mitigation monitor prior to issuance of any foundation only or building permit for the proposed project.

IV.D-6 At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-on letter describing damage, if any, to the former Hotel Constance and the buildings located adjacent and to the south of the project site. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs to the former Hotel Constance shall be undertaken and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24) prior to issuance of any temporary or permanent certificate of occupancy for the new building.

#### *Operation Noise*

Operational noise impacts would be less than significant, and no mitigation measures are required.

#### *Operation Ground-Borne Vibration*

Operational ground-borne vibration impacts would be less than significant, and no mitigation measures are required.

### **Level of Significance after Mitigation**

#### *Construction Noise*

Pile driving noises levels would exceed the 85-dBA at 100 feet significance threshold by approximately 10 dBA. Mitigation Measures IV.D-1 and IV.D-2 would assist in controlling construction noise. Mitigation Measure IV.D-3 would eliminate pile driving activity in favor of caisson drilling. Caisson drilling generates a noise level of 71 dBA at 100 feet, which would be less than the 85 dBA significance threshold. Therefore, construction noise would result in a less-than-significant impact with mitigation.

#### *Construction Ground-Borne Vibration*

Mitigation Measure IV.D-3 would require caisson drilling instead of impact pile driving. Caisson drilling would generate a vibration level of 1.0 inches per second at the former Hotel Constance and the buildings located adjacent and to the south of the project site instead of the 7.2 inches per second pile driving vibration level. Mitigation Measures IV.D-4 through IV.D-6 would ensure

that vibration-induced building damage is recorded and repaired. As such, construction vibration would result in a less-than-significant impact with mitigation.

#### *Operation Noise*

The project-related operational noise would result in a less-than-significant impact without mitigation.

#### *Operation Ground-Borne Vibration*

Operational ground-borne vibration impacts would be less than significant, and no mitigation measures are required.

### **TRANSPORTATION AND CIRCULATION**

#### **Environmental Impacts**

##### *Intersection Impacts*

##### Phase I Conditions

Phase 1 of the proposed project would result in a net total of approximately 1,273 daily trips of which 84 additional trips (49 inbound, 35 outbound) would occur during the morning peak hour and 101 additional trips (53 inbound, 48 outbound) during the evening peak hour.

During the construction of Phase 1, the project's proposed parking structure will not be available until Phase 2 is completed. The hotel will provide valet service to park Phase 1 vehicles at the 2 N. Lake Avenue parking structure. All of the Phase 1 valet trips, not including pass-by, were assigned to and from the existing offsite parking facility at 2 N. Lake Avenue. Phase 1 trips to the off-site parking facility would be a net total of 35 inbound and 49 outbound during the morning peak hour and 49 inbound and 54 outbound during the evening peak hour. These trips occur in addition to the project-generated trips to and from the project site.

Traffic generated by the Phase 1 of the proposed project would not cause a significant impact at any of the 15 study intersections.

##### Phase 2 Conditions

Phases 1 and 2 of the proposed project are combined to reflect proposed project Phase 2 conditions. Phase 2 conditions would have a total net trip generation of 1,354 daily trips of which 98 trips (57 inbound, 41 outbound) would occur during the morning peak hour and 108 trips (56 inbound, 52 outbound) during the evening peak hour. There would be no valet trips in Phase 2 conditions.

None of the analyzed intersections would be significantly impacted by the combined traffic effects of Phase 1 and Phase 2 of the proposed project.

##### Phase 3 Conditions

The overall proposed project (Phases 1, 2 and 3 combined) defined as proposed project Phase 3 conditions, would have a total net trip generation of 4,914 daily trips of which 289 trips (210

inbound, 79 outbound) would occur during the morning peak hour and 488 trips (225 inbound, 263 outbound) during the evening peak hour. Further, it has been assumed for the purposes of this analysis that 75 percent of these trips (755 daily, 75 AM and PM trips) would be valet and the remaining 25 percent (252 daily, 25 AM and PM trips) would be self-parked trips. The overall resulting on-site project trip generation would be 4,662 daily trips of which 264 trips would occur during the morning peak hour and 463 trips would occur during the evening peak hour. The proposed project's trip generation from the valet and self-park trips to 2 N. Lake Avenue would result in 1,007 daily trips of which 100 trips would occur during the morning and evening peak hours.

The intersection of Lake Avenue/Walnut Street would be significantly impacted during the evening peak hour by the combined traffic effects of the overall proposed project, Phases 1, 2 and 3 combined.

### *Roadway Segment Impacts*

Twelve roadway segment locations were identified for analysis, and assessment of conditions with the proposed project for each phase were conducted.

#### Phase 1 Conditions

Two analyzed street segments have an increase in ADT greater than the significance threshold of 7.4 percent:

- Mentor Avenue between Union Street and Colorado Boulevard – 19.5 percent increase
- Mentor Avenue between Green Street and Cordova Street – 8.4 percent increase

Therefore, Phase I of the proposed project (including valet trips to/from 2 N. Lake Avenue) would increase the ADT on Mentor Avenue between Union Street and Colorado Boulevard by 19.5%. This increase is mostly attributable to the valet trips to/from the Project site and the offsite parking structure at 2 N. Lake Avenue. Significant impacts will remain at this location.

#### Phase 2 Conditions

The Mentor Avenue roadway segment between Green Street and Cordova Street increases in ADT by 8.9 percent. Mentor Avenue between Union Street and Colorado Boulevard has a 3.8 percent increase in ADT and the Mentor Avenue roadway segment between Walnut Street and Union Street has an ADT increase of 3.5 percent. Street segment significant impacts will remain.

Increases under Phase 2 conditions (including Phases 1 and 2 traffic generation) are less than those identified under Phase 1 only conditions due to no off-site valet service in Phase 2.

#### Phase 3 Conditions

Due to the overall proposed project (Phase 3 conditions), the following three analyzed street segments have an increase in ADT greater than the significance threshold of 7.4 percent:

- Mentor Avenue between Walnut Street and Union Street – 13.8 percent increase
- Mentor Avenue between Union Street and Colorado Boulevard – 25.5 percent increase

- Mentor Avenue between Green Street and Cordova Street – 11.2 percent increase

Significant impacts will remain. The addition of the Proposed Project under Phase 3 conditions (with valet and self-parking at 2 N. Lake Avenue) would increase the ADT on the analyzed street segments ranging from 1.7 percent to 25.5 percent (along Mentor Avenue between Union Street and Colorado Boulevard).

#### *Congestion Management Program Impacts*

##### Traffic Impact Analysis

The nearest Congestion Management Program (CMP) arterial monitoring intersection to the project site is the intersection of Arroyo Parkway and California Boulevard. Based on the incremental project trip generation estimates, the overall proposed project (Phases 1, 2 and 3 combined) is not expected to add 50 or more new trips per hour to this location. Therefore, no further analysis of CMP arterial monitoring intersections is required. Other CMP arterial monitoring intersections that are located farther from the project site would have even lesser amount of project traffic added and therefore, no further analysis of CMP arterial monitoring locations is needed.

The nearest mainline freeway monitoring locations to the project site are the I-210 Freeway west of SR-134 and I-210 at Rosemead Boulevard. Based on the incremental project trip generation estimates, the overall proposed project (Phases 1, 2 and 3 combined) will not add 150 or more new trips per hour to these locations in either direction. Therefore, no further analysis of CMP freeway monitoring stations is required.

##### Transit Analysis

There are a total of approximately 27 to 30 buses during the peak hours that serve the study area, as well as eight trains (Metro Gold Line) that operate during the peak hours. There would be capacity available on a daily basis, both on the existing bus and train lines, serving the study area. Further, the existing transit system supply as well as the proposed shuttle bus capacity would accommodate the proposed project's anticipated transit demands.

#### *Site Access and Circulation Impacts*

##### Phase 1

There would be no changes to any of the existing driveways along Lake Avenue and Colorado Boulevard. The landscaped area that separates the northern and southern Mentor Avenue driveways would be removed to provide a two lane driveway at the northern driveway on Mentor Avenue. The southern driveway would continue to provide one outbound lane and three existing ATM drive aisles. Also, an area for valet pick-up and drop-off for vehicles would be located on-site for valet operations until Phase 2 is built. The functional adequacy of the valet operations on-site shall be demonstrated to the Pasadena Department of Transportation at the time of final design and permits for the Phase 1 component of the proposed project to ensure there will be no conflicts with on-site services. Continued operational adequacy of the valet operations during Phase 2 construction shall also be demonstrated to Pasadena DOT.

The driveways on Lake Avenue and Colorado Boulevard would continue to provide access to the existing uses west of Phase 2 construction boundary. Off-site valet parking would continue

to be provided for the Phase 1 component of the proposed project until Phase 2 construction is complete and on-site parking is made available for both phases.

### Phase 2

There would be no changes to any of the existing driveways along Lake Avenue and Colorado Boulevard. With the completion of Phase 2, the northern driveway on Mentor Avenue would be removed, leaving a single driveway on Mentor Avenue. One ATM aisle would be removed. The driveway on Mentor Avenue would provide one inbound lane, one outbound lane and two existing outbound ATM drive aisles. All of the driveways would provide access to the partially completed subterranean parking garage through a single ramp located adjacent to the loading area. Phase 2 would also provide eight loading spaces. These loading spaces can be accessed from any of the driveways. The functional adequacy of these loading spaces shall be demonstrated to the satisfaction of Pasadena Department of Transportation at the time of final design and permits for Phase 2 conditions to ensure there will be no conflicts with on-site services. Additionally, the driveway design would need to be coordinated with the City of Pasadena DOT at the time of final design of Phase 2.

During the construction of Phase 3, the driveways on Lake Avenue and Colorado Boulevard would be available to construction vehicles only (unless otherwise stipulated by the Construction Management Plan pre Mitigation Measure IV.E-5). The Mentor Avenue driveway would continue to provide access to the Phase 1 and Phase 2 components of the proposed project. All Phase 2 cumulative traffic would obtain access and egress the site from the Mentor Avenue driveway only and represents for the purposes of analysis, a worst-case evaluation during the period of construction.

### Phase 3

Upon completion of Phase 3, the proposed project would have two driveways serving the site - a driveway on Mentor Avenue and another one on Lake Avenue. The existing driveway on Colorado Boulevard would be removed. The existing driveway on Lake Avenue would be moved southwards (approximately 20 feet to the south). The driveway on Mentor Avenue would continue to operate similar to Phase 2 conditions. Both driveways would provide access to the surface parking lot, subterranean parking garage and all the loading spaces. A 28-foot wide two lane east-west drive aisle would provide on-site access and circulation to the surface parking lot driveway and the ramp accessing the subterranean parking garage. The driveway designs, valet service area and operations and loading area functionality shall be coordinated with the City of Pasadena DOT at the time of final design.

### *Pedestrian Access and Circulation Impacts*

The pedestrian elements, cross-walk and sidewalks, under proposed project are not anticipated to change compared to existing conditions. The proposed project would maintain the 12-foot to 14-foot sidewalk on Lake Avenue along the project frontage and a 15-foot sidewalk along Colorado Boulevard on the south side adjacent to the Project. Adequate pedestrian infrastructure would continue to be available in the vicinity of the project. Numerous pedestrian access and circulation possibilities similar to existing conditions will continue to be available with the proposed project conditions.

## *Parking Impacts*

### Zoning Code Requirements - Phase 1

Based on the City's zoning code requirements, the required parking for the Phase 1 of the proposed project would be 147 spaces. To satisfy Phase 1 parking needs, the parking structure located at 2 N. Lake Avenue would provide the required parking spaces until Phase 2 is built and Phase 1 parking is provided on-site. Up to 162 spaces would be provided for the project off-site at 2 N. Lake Avenue.

### Zoning Code Requirements - Phase 2

A portion of the proposed subterranean parking garage will be completed in Phase 2 containing 225 parking spaces. An additional 12 at-grade spaces will also be provided in Phase 2. The existing parking structure on-site is anticipated to be demolished in this phase.

Based on the zoning code requirements, the required on-site or off-street parking for the Phase 2 component of the proposed project would be 74 spaces. The total number of spaces required by code under Phase 2 conditions (Phases 1 and 2 combined) is 221 spaces (147+74 spaces). Phase 2 of the proposed project would provide 237 spaces onsite.

### Zoning Code Requirements - Phase 3

The proposed project, under Phase 3 conditions, would provide a total of 650 spaces, 550 spaces on-site and 100 spaces, off-site, at the 2 N. Lake Avenue parking structure. Based on the zoning code requirements, the required on-site or off-street parking for the Phase 3 component only of the proposed project would be 562 spaces. The total number of spaces required per code, under Phase 3 conditions (Phases 1, 2, and 3 combined), taking into consideration the TOD reductions, is 783 (562 + 74 + 147) spaces.

### Shared Parking Analysis - Phase 1

A shared parking demand analysis was conducted for Phase 1 component of the proposed project. It was determined that a total of 147 spaces would be needed during peak parking periods. In order to assess actual availability of parking spaces at the 2 N. Lake Avenue valet location, parking utilization surveys were performed at this parking structure and the availability of parking spaces determined. At the time of the survey, the building occupancy at 2 N. Lake Avenue was approximately 90 percent. The peak parking utilization at 2 N. Lake Avenue occurred at 2 PM when 63 percent (420 of the 662 spaces) of the spaces were occupied. Approximately 240 spaces were unoccupied at the peak time on a weekday and many more spaces were available at other times of the day. Peak observed parking demand, computed peak parking demand adjusted for full occupancy of the uses currently served by the structure and potential available parking supply at an overall peak occupancy of 90 percent, 95 percent, and 100 percent were determined with 162 spaces potentially available at 95 percent overall occupancy.

In summary, adequate number of parking spaces would be available at 2 N. Lake Avenue to satisfy the proposed project's Phase 1 parking needs.

### Shared Parking Analysis - Phase 2

The proposed project under cumulative Phase 2 conditions would have a peak parking demand of 178 spaces on a summer (June) weekend day at 11 PM. The proposed parking supply on-site is 237 spaces indicating that there would be adequate parking supply under Phase 2 conditions and that there would be no significant parking impact with the proposed project.

### Shared Parking Analysis - Phase 3

Phase 3 conditions would have a peak parking demand of 585 spaces at 2:00 p.m. on a summer (June) weekday. The proposed project would provide a total parking supply of 650 spaces - 550 spaces on-site and 100 spaces off-site at the existing parking structure at 2 N. Lake Avenue. These off-site spaces at 2 N. Lake Avenue would be available to both valet and self-park vehicles from the proposed project throughout the day. It was further assumed that 75 spaces would be used for valet and 25 spaces for self-park for traffic analysis purposes. The parking supply proposed for the overall proposed project (650 spaces) would accommodate the peak demand of the proposed project. Therefore, no parking impacts would result due to the overall proposed project.

### *Construction Impacts*

#### Construction Traffic

The peak hour trips generated during the construction of each phase of the proposed project is not significant. It is anticipated that the construction activity would occur between the hours of 6:00 AM to 3:00 PM. However, it is recommended that construction truck traffic be restricted to the hours of 9:00 AM to 3:00 PM, which is outside of the typical peak hour period of traffic. The typical hours of construction and deliveries would not overlap with the PM peak hour and would preclude most, if not all, effects of traffic in the evening peak hour on adjacent streets. It is also worth noting that the effects of construction traffic during the period of construction would be temporary in nature and would not be felt after construction activities are completed.

However, in order to maintain key elements of the transportation infrastructure in an operable manner during construction and to minimize the construction impacts, a construction traffic management plan is recommended for each of the three phases of construction of the proposed project. Within this construction traffic management plan, it is recommended that during Phase 3 construction, all the sidewalks, crosswalks and travel lanes along Lake Avenue, Mentor Avenue and Colorado Boulevard would be available and that pedestrian and vehicular access and circulation within and in the vicinity of the project site would be maintained at all times. With implementation of the construction management plan, the traffic effects due to construction would be minimized and no adverse construction traffic impacts would occur.

#### Construction Parking

It is anticipated that the construction workers would be transported to the project site using shuttles (bus or van). There would be no construction workers parked on-street. No construction worker parking impacts are anticipated during the period of construction of all three phases of the project.

## Mitigation Measures

### ~~Phase I~~

#### Intersections

~~No mitigation measures related to intersection operations would be required for Phase 1 of the proposed project. However, a~~ All phases of the project are subject to the City's Transportation Demand Management (TDM)/Trip Reduction Ordinance (TRO) requirements. The purpose of the trip reduction requirement is to reduce the demand for automobile commute trips by ensuring that the design of major nonresidential developments projects accommodates facilities for alternative modes of transportation. A TDM plan shall be completed to address the project's programs to promote alternative modes of transportation prior to the issuance of the first permit for construction per phase (foundation, demolition, grading, or building) and shall meet the following requirements:

1. *Carpool and Vanpool Parking.* A minimum of 10% of the employee parking spaces shall be reserved for and designated as preferential parking for carpool and vanpool vehicles. Such parking area shall be in a location more convenient to the place of employment than parking spaces for single occupant vehicles, and shall be located as close as practical to the employees' entrances.
2. *Bicycle Parking.* Bicycle parking shall be provided on-site in compliance with Section 17.46.320 (Bicycle Parking Standards). In addition, the bicycle parking shall be located near the employee entrance and shall be conveniently accessible from the external circulation system.
3. *Transportation Demand Management Program Plan.* A Transportation Demand Management Program ("TDM") Plan shall be submitted which complies with Chapter 10.64 of the Municipal Code (Transportation Management Program). The owner/developer shall place a deposit with the Department of Transportation prior to the issuance of the first permit for construction (foundation, demolition, grading, or building) per phase. This deposit is subject to a partial refund or additional billing in the event that the deposit amount is 'not sufficient to cover the cost of the review. The developer shall pay an annual Transportation Demand Management (TDM) status report review fee in compliance with the requirements of the Trip Reduction Ordinance.

### Phase I

#### Intersections

No mitigation measures related to intersection operations would be required for Phase 1 of the proposed project. However, all phases of the project are subject to the City's Transportation Demand Management (TDM)/Trip Reduction Ordinance (TRO) requirements.

#### Street Segments

- IV.E-1 The proposed project shall contribute funds to the Neighborhood Traffic Management Capital Improvement Program Fund Number 75210. The funds will be used to implement traffic management measures to protect neighborhoods potentially influenced by the project's traffic. This mitigation measure is in line with the objectives

of the street segment thresholds to protect residential neighborhoods from intrusion of traffic intended to and from commercial projects. Section 4.1.3.1 of the Mobility Element of the General Plan states: "The Council established, as City policy, that traffic growth would be limited on selected streets in order to protect residential neighborhoods."

- IV.E-2 All of the sidewalks, crosswalks and travel lanes along Mentor Avenue and Colorado Boulevard shall be made available such that pedestrian and vehicular access and circulation within and in the vicinity of the project site would be maintained at all times during Phase 1 construction activities.

### Transit

No mitigation measures related to public transit operations would be required for Phase 1 of the proposed project.

### Access/Circulation

- IV.E-3 The functional adequacy of the valet operations on-site shall be demonstrated to the Pasadena Department of Transportation at the time of final design and permits for the Phase 1 component of the proposed project to ensure there will be no conflicts with on-site services. Continued operational adequacy of the valet operations during Phase 2 construction shall also be demonstrated to Pasadena DOT.

### Parking

Although an adequate number of parking spaces would be available at 2 N. Lake Avenue to satisfy Phase 1 parking needs, the following measure is required to ensure the formal agreement to allow for off-site parking is in place, prior to proceeding with the project.

- IV.E-4 A formal recorded parking agreement between the applicant and the off-site parking provider shall be submitted to the City's Planning Department and Department of Transportation prior to the issuance of the first permit for construction (foundation, demolition, grading, or building). The parking agreement shall indicate the number of parking spaces to be leased to the applicant, and any time constraints to access those parking spaces, if any.

### Construction

- IV.E-5 A final construction traffic management plan shall be prepared for each phase of the proposed project. This Plan would address haul routes, dust control, noise control and City regulations. The construction management plan ensures that the construction activities and workers follow the City regulations and provides details of activities planned on-site will be prepared at the time of final design, prior to commencement of construction. The Construction Management Plan will address various issues and details such as those noted above - number of construction trips, haul routes and delivery management, relocation of the bus stop along Lake Avenue and associated coordination with the local transit operators), appropriate signage, temporary relocation/closing sidewalks along Lake Avenue, Colorado Boulevard and Mentor Avenue and other site-specific changes during construction.

- IV.E-6 Construction truck traffic shall be restricted to the hours of 9:00 AM to 3:00 PM, which is outside of the typical peak hour period of traffic, unless as otherwise stipulated per Mitigation Measure IV.E-5.
- IV.E-7 Construction staging shall not block any lanes of traffic along the project frontage of Lake Avenue, Colorado Boulevard and Mentor Avenue.
- IV.E-8 Construction workers shall be restricted from parking on-street. Construction workers should be transported to the project site using shuttles (bus or van).

No mitigation measures related to construction parking would be required for Phase 1 of the proposed project.

### *Phase 2*

#### Intersections

No mitigation measures related to intersection operations would be required for Phase 2 of the proposed project. However, all phases of the project are subject to the City's Transportation Demand Management (TDM)/Trip Reduction Ordinance (TRO) requirements ~~as described under Phase 1.~~

#### Street Segments

Refer to Mitigation Measure IV.E-1 above.

#### Transit

No mitigation measures related to public transit would be required for Phase 2 of the proposed project.

#### Access/Circulation

IV.E-9 The configuration of the Mentor Avenue driveway shall be coordinated with the City of Pasadena DOT before Final design approval. Specifically, the Mentor Avenue driveway shall be designed to provide unimpeded vehicular access at all times. At a minimum, DOT recommends three unrestricted lanes to serve vehicular traffic to and from Mentor Avenue. Appropriate overhead signage and striping shall be installed to reduce on-site driver confusion and decision-making.

IV.E-10 The functional adequacy of the loading spaces shall be demonstrated to the satisfaction of the Pasadena Department of Transportation at the time of final design and permits for Phase 2 conditions to ensure there will be no conflicts with on-site services.

#### Parking

No mitigation measures related to parking would be required, as an adequate number of parking spaces would be available to satisfy Phase 2 parking needs.

### Construction

Refer to Mitigation Measures IV.E-5 through IV.E-8.

### *Phase 3*

### Intersections

IV.E-11 *Lake Avenue/Walnut Street* – The proposed project shall compensate for the acquisition of a shuttle bus as well as for the operations and maintenance (O&M) costs for the new shuttle bus service to be operated along Lake Avenue and/or the Walnut Street travel corridors at minimum for the first three years. The final route selection would be determined by the transit shuttle operator. Additionally, the unsubsidized portion of the O & M costs for this shuttle service for an additional seven years shall be considered. This Project transit improvement will recognize, consider, and build upon the recommendations from Pasadena ARTS Bus or any other bus operator for implementation of this improvement.

IV.E-12 *Transit Incentives* – The proposed project shall provide subsidized transit passes at specific locations, conveniently located on-site. All eligible employees, residents and hotel guests shall be offered discounted daily or monthly transit passes giving them access to all transit services operating in the area.

In addition, all phases of the project are subject to the City's Transportation Demand Management (TDM)/ Trip Reduction Ordinance (TRO) requirements as described under Phase 1.

### Street Segments

Refer to Mitigation Measure IV.E-1 above.

### Transit

IV.E-13 For the bus zone at the southeast corner of the Lake Avenue/ Colorado Boulevard intersection, the following conditions shall apply:

1. The applicant shall provide funds for a new bench, solar trash container, and bus stop signage;
2. Bus zone shall be a minimum of 130 feet wide at this very heavily used transit stop location.
3. No new trees shall be located within the bus zone to prevent interference with ADA guidelines, boarding/alighting, and other pedestrian accessibility.
4. The existing bus shelter shall be retained in the zone at all times.
5. Existing transit operations of the transit stop shall be maintained during and after construction at all times.

### Access/Circulation

IV.E-14 The driveway designs, valet service area and operations and loading area functionality shall be coordinated with the City of Pasadena DOT at the time of final design.

IV.E-15 Truck and vehicular turn templates should be laid out on the site plan once design details have been worked out to ensure that on-site congestion is minimized to the satisfaction of Pasadena DOT at the time of final design approval.

### Parking

No mitigation measures related to parking would be required, as an adequate number of parking spaces would be available to satisfy Phase 3 parking needs.

### Construction

Refer to Mitigation Measures IV.E-5 through IV.E-8 above.

## **Level of Significance After Mitigation**

### *Intersections*

Based on the traffic impact analysis conducted at the intersection of Lake Avenue/Walnut Street under Phase 3 conditions, it was determined that provision of additional transit capacity along Lake Avenue and/or Walnut Street travel corridors would fully mitigate the proposed project's impact at this intersection. The proposed addition of a shuttle bus would increase transit capacity along the Lake Avenue and/or Walnut Street travel corridors as well as along other areas in the project vicinity. This would offer the ability to reduce the number of vehicular trips in the corridor served by the additional bus. In addition, this transit improvement would have the potential to improve operations at many intersections along the selected route including the impacted intersection of Lake Avenue and Walnut Street.

Assuming a 30-seat bus at approximately 80% capacity, as many as 25 peak-hour person trips traveling during the peak hours could be served by the proposed improvement. The addition of one shuttle bus per hour has the ability to reduce the hourly automobile travel in the corridor by 21 vehicular trips per direction (25 seats per bus/1.2 persons per automobile). The addition of the bus along the Lake Avenue corridor would also improve transit network connectivity by offering improved/enhanced access to the Metro Gold Line Station at the Lake Avenue/I-210 interchange.

Implementation of Mitigation Measure IV.E-10 reduces the significant impact at the intersection of Lake Avenue/Walnut Street to a less than significant level.

### *Street Segments*

The addition of the proposed project for all three phases would increase the ADT on the analyzed street segments and result in significant impacts on segments along Mentor Avenue (increases of more than 7.4 percent). The proposed project would contribute funds to the Neighborhood Traffic Management Capital Improvement Program Fund to implement traffic management measures to protect neighborhoods potentially influenced by the proposed project's traffic. This mitigation measure is in line with the objectives of the street segment

thresholds to protect residential neighborhoods from intrusion of traffic intended to and from commercial projects. However, even with mitigation, significant impacts to these street segments would remain.

#### *Transit*

No mitigation measures related to transit impacts are required, as there would be capacity available on a daily basis, both on the existing bus and train lines, serving the study area. Further, the existing transit system supply as well as the proposed shuttle bus would accommodate the proposed project's anticipated transit demands during all three phases of the proposed project. Therefore, impacts related to transit would be less than significant.

#### *Access/Circulation*

Pasadena DOT's review and approval of the final driveway designs would ensure that impacts related to access and circulation would be less than significant.

#### *Parking*

There would be a sufficient number of parking spaces provided to accommodate the projected demand for all three phases of the proposed project. Therefore, impacts related to parking would be less than significant.

#### *Construction*

With implementation of the construction management plan for all three phases of the proposed project, traffic and parking impacts related to construction would be less than significant.

### **UTILITIES – WASTEWATER AND SERVICE SYSTEMS**

#### **Environmental Impacts**

The existing sewer laterals along the Mentor Avenue, Colorado Boulevard and Lake Avenue project frontages would be utilized for new building sewers to the maximum extent possible. However, since sewer loads and points of connection cannot be finalized until the mechanical engineer has designed the plumbing system within the building, one new 6-inch sewer lateral may be required to connect to the Mentor Avenue sewer and one new 6-inch sewer lateral may be required to connect to the Lake Avenue sewer.

The proposed project is estimated to generate an average daily wastewater flow of 115,108 gpd and would, result in a net sewage generation increase of 79,806 gpd over the existing on-site wastewater generation before the implementation of water conservation measures. With the implementation of City of Pasadena mandated water conservation goals, proposed project's sewage generation would be reduced by 20 percent to 56,784 gpd. The 56,784 gallons per day represent 0.24 and 0.57 percent of the remaining daily treatment capacities of the San Jose and Whittier Narrows WRPs.

The net change of wastewater generated during the average daily flow, peak dry daily flow, and peak wet daily flow scenarios is 0.08, 0.16, and 0.21 mgd, respectively.

With project implementation, sewage rates in the Mentor Avenue sewer system would decrease capacity on average by six percent, sewage rates in the Colorado Boulevard sewer system would decrease capacity on average by three percent, and sewage rates in the Lake Avenue sewer system would decrease capacity on average by seven percent. Although implementation of the proposed project is expected to decrease the capacity of the three sewer systems serving the project site, the decrease in capacity of the three sewer systems would not cause them to exceed their available capacity or be over 75 percent full, which the City of Pasadena defines as a safe loading capacity.

Consequently, the proposed project will not require improvements to the existing off-site sewer system according to the City of Pasadena Department of Public Works.

Sewer loading for the Lake Avenue connection can be partially reduced in the final design phase and shifted to the Colorado Boulevard and/or Mentor Avenue connection(s) in an effort to distribute sewage flows more evenly. Redistributing sewage flows in such a manner would reduce the less significant project impacts even further.

Downstream of the City of Pasadena, sewage is treated regionally by the LACSD. Implementation of the proposed project will decrease the capacity of the Chapel Avenue Trunk Sewer by at most 0.705 percent, the Allen Avenue Trunk Sewer by at most 04.395 percent, the San Jose Creek Water Reclamation Plant by at most 0.0624 percent, and the Whittier Narrows Water Reclamation Plant by at most 0.4057 percent. The City of Pasadena and/or LACSD would assess a sewer facility charge for increases of expected sewage volume rates. However, with implementation of mitigation measures, potential impacts to the local sewer system and regional wastewater treatment facilities would be less than significant.

### **Mitigation Measures**

- IV.F.1-1 At the time of construction design documents and if determined by the Department of Public Works, the applicant shall install one new 6-inch sewer lateral in Mentor Avenue or Lake Avenue, to Department of Public Works specifications. Since the lateral is not allowed to be larger than 6-inches, there is no ability to install a larger lateral in anticipation of future development.
- IV.F.1-2 The City of Pasadena Department of Public Works shall approve all plans for the proposed installations prior to issuance of any building permit and all improvements shall be provided to the satisfaction of the City Engineer prior to issuance of Certificates of Occupancy.
- IV.F.1-3 If so directed by the City of Pasadena Department of Public Works at the time a connection request is made, sewer loading for the proposed project shall be directed away from the Lake Avenue sewer system, which has relatively less available capacity, to the Colorado Boulevard or Mentor Avenue sewer systems to the satisfaction of the City Engineer.

### **Level of Significance After Mitigation**

Mitigation Measures IV.F.1-1 through IV.F.1-3 would ensure that sufficient improvements are provided with adequate capacity to serve the proposed project to the satisfaction of the City of Pasadena Department of Public Works. The applicant would be bound to providing improvements that are, at a minimum, sufficient to meet the needs of the proposed project.

Consequently, with implementation of mitigation measures, potential impacts to the local sewer system and regional wastewater treatment facilities would be less than significant.

## UTILITIES – WATER SUPPLY SYSTEMS

### Environmental Impacts

New water infrastructure serving the proposed project would include a new 4-inch fire water service lateral along Mentor Avenue. Additionally, a new 6-inch fire water service lateral will be required along Colorado Boulevard. A new 4-inch domestic water service will be required along Colorado Boulevard and a new 4-inch domestic water service will be required along Lake Avenue. A new fire hydrant will be required along Mentor Avenue at Colorado Boulevard. Additionally, a new fire hydrant will be required along Lake Avenue at the southerly project boundary.

The proposed project would have an estimated gross and net water consumption of 147,338 gpd and 82,568 gpd, respectively. The net change of water usage generated during the average daily flow, peak dry daily flow, and peak wet daily flow scenarios is 0.11, 0.22, and 0.29 mgd, respectively.

According to PWP, the existing available fire flow is 2,568 gallons per minute (GPM) at 52 PSI for the 20-inch line within Colorado Boulevard, 2,657 GPM at 54 PSI for the 12-inch line within Lake Avenue and 1,721 GPM at 58 PSI for the 8-inch line within Mentor Avenue. Since the existing facilities have been determined to be adequate, full build-out of the proposed project will not require improvements to the existing local water distribution system or the installation of additional water distribution lines for the development.

Although new local infrastructure is not needed, there are overall concerns of adequate water supply within the City, and the proposed project would generate increased demand for water. However, the PWP would be able to supply the projected demand based on existing entitlements provided the project incorporates conservation. As the City is currently under a Level 1 Water Supply Shortage declaration per PMC 13.10.040, the project will comply with all requirements of Pasadena Municipal Code (PMC) Title 13 during any water shortage declaration.

Specific mitigation is proposed to ensure that City water conservation targets are met or exceeded. As such, strategies under LEED Water Efficiency Credit 3.1 would be employed as a mitigation measure to meet the City's requirement for a project to conserve at least 20 percent of its potable water usage. LEED Water Efficiency Credit 3.1 employs strategies that in aggregate use 20 percent less water than the water use baseline calculated for the building (not including irrigation) after meeting the Energy Policy Act of 1992 fixture performance requirements. Calculations are based on estimated occupant usage and shall include only the following fixtures (as applicable to the building): water closets, urinals, lavatory faucets, showers and kitchen sinks.

### Mitigation Measures

IV.F.2-1 Consistent with LEED New Construction and Major Renovations, Water Efficiency Credit 3.1, the project shall employ strategies that in aggregate use 20% less water than the water use baseline calculated for the building (not including irrigation) after meeting the Energy Policy Act of 1992 fixture performance requirements. Calculations

are based on estimated occupant usage and shall include only the following fixtures (as applicable to the building): water closets, urinals, lavatory faucets, showers and kitchen sinks.

- Implementation of fixtures that meet or exceed those fixtures listed in LEED NC V3.0 Credit Number 3 in the table titled “Commercial and Residential Fixtures”.
- Renovation of the existing hotel will include replacement of toilets with high efficiency toilets and replacement of shower heads with low flow shower heads and faucets.
- Restrooms in the proposed residential units will include high efficiency toilets as well as low flow shower heads and faucets.
- Restrooms in the proposed office and retail areas will include waterless urinals, high efficiency toilets and low flow faucets.
- The project will install drought-resistant landscaping and an automated irrigation system.
- Hotel linen services will not be provided on-site.

### **Level of Significance After Mitigation**

Implementation of Mitigation Measure IV.F.2-1 would result in a 20 percent reduction of water usage under typical baseline usage of gross projected volume on County of Los Angeles water usage rates, type of facility, and number of units or amount of square footage. This measure would achieve project consistency with the City’s goal of increasing water conservation by 20 percent by 2020. Furthermore, the project would neither conflict with water supply planning undertaken by the applicable water district nor create a demand that would exceed existing water supply entitlements. Consequently, no significant unmitigated impacts to the regional water supply would occur with the project.