APPENDIX C

Initial Study

CITY OF PASADENA
175 NORTH GARFIELD AVENUE
PASADENA, CA 91101-1704

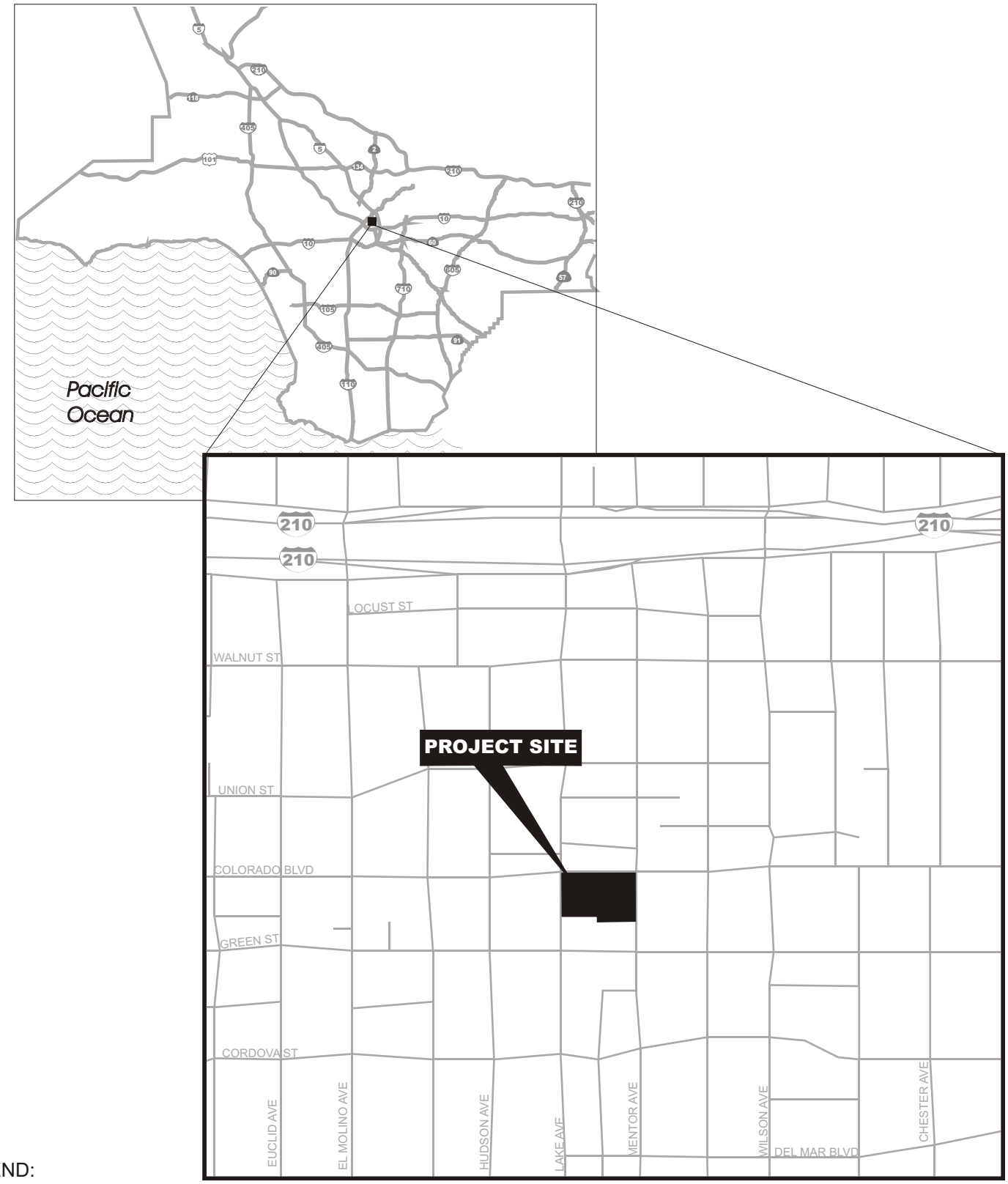
INITIAL STUDY

In accordance with the Environmental Policy Guidelines of the City of Pasadena, this analysis, the associated "Master Application Form," and/or Environmental Assessment Form (EAF) and supporting data constitute the Initial Study for the subject project. This Initial Study provides the assessment for a determination whether the project may have a significant effect on the environment.

SECTION I – PROJECT INFORMATION

1. Project Title: 880-940 East Colorado Boulevard Project
2. Lead Agency Name and Address: City of Pasadena, 175 N. Garfield Avenue, Pasadena, CA 91101-1704
3. Contact Person and Phone Number: John Steinmeyer, Senior Planner (626) 744-4009
4. Project Location: 880 East Colorado Boulevard, Pasadena, CA 91101 (E. Colorado Boulevard at S. Mentor Ave - see Figure1)
5. Project Sponsor's Name and Address: Kelly Farrell, RTKL Associates, Inc. 333 South Hope Street C-200
6. General Plan Designation: Central District Specific Plan
7. Zoning: CD5-AD2
8. Description of the Project:

   The proposed project involves renovation of an existing historic structure (originally constructed as the Constance Hotel in 1926 subsequently occupied as the Pasadena Manor retirement home, and currently vacant), demolition of existing commercial uses and new development of additional hotel, restaurant, office, retail and limited (five units) residential uses. The three-phased development would renovate the existing structure to provide 114 hotel rooms in an initial phase and add 42 new rooms as an addition to the existing structure in later phases. Phase 1 would also include 2,397 square feet of bar/restaurant space, 357 square feet of retail space and conversion of existing hotel area into five condominium units (16,070 square feet). Two new buildings would be constructed in subsequent phases and include new commercial development. The Phase 2 building would total 40,660 square feet and include the 42 additional hotel rooms, 8,010 square feet of retail space and 1,920 square feet of outdoor restaurant space. *A* rooftop pool would also be built. The building would be built to six stories (five occupied levels with one roof level) with a maximum height of 65'-9". The third and final phase would total 148,100 feet of gross floor area (143,110 square feet of net leasable area), of which 103,410 square feet would be office space, 30,490 square feet would be restaurant space and 14,200 square feet would be retail space. This building would be built to seven stories (six occupied levels with one roof level) with a maximum height of 90 feet. Total development would be approximately 252,178 gross square feet (including the renovated hotel), resulting in a total Floor Area Ratio (FAR) OF 2.97:1, consistent with allowable FAR of 3:1 for six of the seven site lots, and 2.75:1 for the remaining lot. Table 1 provides a breakdown of the project components by phase.



LEGEND:

Project Site

SOURCE: TAHA, May 2009

880-940 East Colorado Boulevard Project
Initial Study

ENVIRONMENTAL PLANNING ASSOCIATES, INC.

FIGURE 1

REGIONAL LOCATION

TABLE 1 Project Components by Phase			
USE	**UNITS (Rooms/Units)**	**AREA (Sq. Ft.)**	**PARKING (Spaces)**
PHASE 1			
EXISTING HOTEL BUILDING			
Hotel	114	44594	114
Restaurant		2,397	24
Retail		357	0
Subtotal	*114*	*47,348*	*138*
EXISTING HOTEL BUILDING			
Condominiums	5	16,070	10
PHASE 1 SUBTOTAL	***114/5***	***63,418***	***148***[1]
PHASE 2			
NEW HOTEL			
Hotel	42	30,730	38
Retail		8,010	22
Spa		NA	
Restaurant		1920	17
Outdoor seating		1000	9
PHASE 2 SUBTOTAL	***42***	***41,660****	***86***
PHASE 3			
NEW RETAIL AND OFFICE			
Office		103,410	233
Restaurants		30,490	274
Retail/Bank		14,200	38
Outdoor seating		1,770	16
PHASE 3 SUBTOTAL		***149,870****	***561***
TOTAL PROJECT	**156/5**	**254,948***	**795**

SOURCE: RTKL Architects.
1 Phase I parking will be provided at off-site locations. See Access and Parking discussion for more description.
* Includes outdoor seating

The project would provide a total of 795 subterranean parking spaces upon completion, however, parking for 148 vehicles will be provided off-site in the project area for Phase 1. Access to the project would be provided from both Lake Avenue and Mentor Avenue. No access will be allowed from Colorado Boulevard. Approximately 110,780 cubic yards of excavation is anticipated for subterranean parking, all of which would be exported off-site.

ACCESS AND PARKING

Access to the project would be provided from both Lake Avenue and Mentor Avenue. No access will be allowed from Colorado Boulevard. The project will be designed such that two-way through access/flow from either entrance could be achieved. Ramps from the primary project access points on Lake and Mentor Avenues would also lead down to subterranean parking. Valet parking for hotel guest and site visitors/users will be provided below grade in the northwest corner of the first

subterranean level. Hotel and other project loading would be provided at the ground level adjacent to the hotel and south of/adjacent to the courtyard and new retail/restaurant space.

During Phase 1 of the project, parking necessary to serve the renovated hotel (148 spaces) will be provided off-site in the project area. This will be temporary until construction of on-site parking begins during Phase 2. By the completion of Phase 2, parking for 234 vehicles will be provided on-site serving all hotel, retail, restaurant and residential uses completed through Phase 2. The remainder of subterranean parking will be provided during Phase 3 and by the completion of Phase 3, parking for the 795 spaces serving all project uses will be provided on-site.

SUSTAINABLE FEATURES

The proposed project has committed to pursuing a Leadership in Energy and Environmental Design (LEED) certification under the US Green Building Council (USGBC) consistent with the City of Pasadena's Green Building Program. Specifically, the project intends to pursue LEED NC 2.2 Certification for New Buildings and Major Renovations.

9. Surrounding Land Uses and Setting: The project site is located within an urban area on one of the City's main commercial streets and is surrounded by commercial, retail and high-density residential land uses. To the north across Colorado Boulevard is an eleven-story office building, to the east across Mentor Avenue is a two-story retail building, a parking structure and a four-story apartment building, adjacent to the project site to the south is a single-story restaurant and a ten-story office building, and across Lake Avenue to the west are a two-story and nine-story office building.

10. Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement): None

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

X	Aesthetics		Geology and Soils		Population and Housing
	Agricultural Resources		Hazards and Hazardous Materials		Public Services
X	Air Quality		Hydrology and Water Quality		Recreation
	Biological Resources		Land Use and Planning	X	Transportation/Traffic
X	Cultural Resources		Mineral Resources	X	Utilities and Service Systems
	Energy	X	Noise	X	Mandatory Findings of Significance

DETERMINATION: (to be completed by the Lead Agency)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that, although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	**X**
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment., but at least effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards , and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	

_____ _____

Prepared By/Date Reviewed By/Date

_____ _____

Printed Name Printed Name

Negative Declaration/Mitigated Negative Declaration adopted on: _____

Adoption attested to by: _____

Printed name/Signature Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. " Potentially Significant Impact' is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 20, "Earlier Analysis," may be cross-referenced).

5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. See CEQA Guidelines Section 15063(c)(3)(D). Earlier analyses are discussed in Section 20 at the end of the checklist.

   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier documents and the extent to which address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and

   b) The mitigation measure identified, if any, to reduce the impact to less than significant

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

SECTION II - ENVIRONMENTAL CHECKLIST FORM

1. BACKGROUND.

Date checklist submitted: May 13, 2009
Department requiring checklist: Planning & Development
Case Manager: John Steinmeyer, Senior Planner

2. ENVIRONMENTAL IMPACTS. (explanations of all answers are required)**:**

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

3. AESTHETICS. Would the project:

a. *Have a substantial adverse effect on a scenic vista?*

☐	☐	☑	☐

WHY? A scenic vista refers to views of focal points or panoramic views of broader geographic areas that have visual interest. Diminishment of a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view, so that the quality of the view is permanently affected. Scenic vistas within the project area include views of the San Gabriel Mountains, the Arroyo Seco, the San Rafael Hills, Eaton Canyon, or Old Town Pasadena.

The project site is located within an urbanized area on one of the City of Pasadena's main commercial streets and is currently developed with the former Constance Hotel, various one-story retail and restaurant uses, a one-story bank with drive-up tellers, and a two-story parking garage. Building heights in the immediate project vicinity range from one to 11 stories. To the north of the project site across Colorado Boulevard is an eleven-story office building. To the east across Mentor Avenue is a two-story retail building, a parking structure and a four-story apartment building. Adjacent to the project site to the south is a single-story building occupied by a restaurant and a 10-story office building. Across Lake Avenue to the west is a two-story and a nine-story office building.

While pedestrian level views of the Verdugo Mountains and San Gabriel Mountains are available within the project area, previously unobstructed views would not be affected by the proposed project. Furthermore, the project site is not located in an area that offers views of the Arroyo Seco, the San Rafael Hills, Eaton Canyon, or Old Town Pasadena. 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. In addition, in accordance with section 17.61.030 of the City's Zoning Code, the design of the proposed project would be reviewed through the City's design review process. This regulatory procedure provides the City with an additional layer of review for aesthetics, and an opportunity to incorporate additional conditions to increase the aesthetic value of the proposed project. As such, impacts to scenic vistas would be less than significant, and further analysis in an EIR is not warranted.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
b. *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*	☐	☐	☑	☐

WHY? A potentially significant impact would occur if the proposed project would substantially damage scenic resources within a State Highway. The only designated state scenic highway in the City of Pasadena is the Angeles Crest Highway (State Highway 2), which is located north of Arroyo Seco Canyon in the extreme northwest portion of the City. The project site is not within the viewshed of the Angeles Crest Highway, and not along any scenic roadway corridors identified in the City's General Plan. The proposed project would not result in the destruction of any landmark-eligible trees, stand of trees, rock outcropping or natural feature recognized as having significant aesthetic value. However, the Constance Hotel, which would be renovated and expanded as part of the proposed project, 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) as a representative example of the tourist hotel property type constructed in a significant period in the City's history under the historic context theme of tourism. Therefore, the proposed renovations to the hotel would occur in accordance with Section 106 requirements of the National Historic Preservation Act of 1966 (NHPA) (see response to checklist question 7.a for a discussion of historic compatibility). In addition, 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 regulatory procedure was established to ensure that the design, colors, and finish materials of development projects comply with adopted design guidelines and achieve compatibility with the surrounding area. Therefore, although the proposed project would not substantially degrade the visual character of the project site and surroundings, 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, and further analysis in an EIR is not warranted.

c. *Substantially degrade the existing visual character or quality of the site and its surroundings?*	☑	☐	☐	☐

WHY? Potentially significant impacts to the visual character of a project site and its surroundings are generally based on the removal of features with aesthetic value or on the introduction of contrasting urban features into a local area, and the degree to which the elements of the project detract from the visual character of an area. As discussed in response 3.a, the project site is currently developed with the former Constance Hotel, various one-story retail and restaurant uses, a one-story bank with drive-up tellers, and a two-story parking garage. The hotel would be renovated and retained as part of the proposed project, however all other existing structures would be removed to accommodate the proposed project. In addition, 36 trees would be removed from the project site. Based on the tree inventory prepared for the project site in March 2009, two of the 36 trees appear to meet the size criteria for protection under the City's Tree Protection Ordinance.

Impact of the Project on the Visual Character of the Project Site and Surrounding Area

The existing visual character of the project site is highly valued within the community, and the proposed project may affect certain visual attributes of the project site, particularly with respect to the renovation of the historic hotel and removal of mature trees. Therefore, as required by section 17.61.030 of the Pasadena Municipal Code, the design of the proposed project will be reviewed for approval through the

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

City's design review process. This regulatory procedure was established to ensure that the design, colors, and finish materials of development projects comply with adopted design guidelines and achieve compatibility with the surrounding area. While the effect of the proposed project on the visual character of the project site and surroundings will be addressed through the design review process and other regulatory requirements, the EIR will also assess the degree of change to the existing visual resources on the project site and its surroundings, including the removal of the 36 trees.

Shade/Shadow

During Phase 1 the existing hotel building would undergo interior renovation and some exterior maintenance. However, Phase 2 would include development of several lots adjacent to the hotel on the west and south. New construction would include a new 40,660 square foot building at the rear of the hotel with 42 additional hotel rooms, 8,010 square feet of retail space and 1,920 square feet of outdoor restaurant space. The second phase would also provide 70 spaces of sub-grade parking. The new building would be built to a maximum height of six stories and 65'-9" feet. This height is within the height limit in the CD5-AD2 zoning district. Phase 3 construction would include the balance of subterranean parking, ground floor retail and the office building. Specifically, new construction would include a 148,100 square foot square foot building built to a maximum height of 90 feet and seven stories. The new building will also be slightly "stepped" on the south with a maximum height of 90 feet and 7 stories, consistent with the hotel addition built in Phase 2.

Building heights in the immediate project vicinity range from one to 11 stories. Although the proposed project may cast shadows on adjacent sites, no significant impact is expected to occur since shading of existing uses is fairly commonplace in this environment and an inherent characteristic of high density, high-rise neighborhoods. Furthermore, the area immediately surrounding the site is characterized by higher density commercial uses. No parks, schools or public open spaces are located within an area that could be affected by project shadows. Any residential uses are high-density multi-family uses with no exterior balconies or courtyard spaces. As such, these uses are generally not considered to be as shade-sensitive as single-family low-rise neighborhoods, where there is far less obstruction than in a high-density urban setting. Nevertheless, given the proposed building heights a shadow study will be included in the EIR.

d. *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

☐	☐	☑	☐

WHY? A potentially significant impact would occur if light and glare substantially altered the character of off-site areas surrounding a project or interfered with the performance of an off-site activity. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point source lighting that contrasts with existing low ambient light conditions.

Currently, the project site is not a significant source of light or glare; however, the project site is located within an urbanized area on one of the City's main commercial streets where ambient nighttime light levels are medium to high. The surrounding mid- and high-rise structures typically utilize moderate levels of interior and exterior lighting for security, parking, signage, architectural highlighting, and landscaping. The

streets in the area are lined with light fixtures for visibility and safety purposes, and traffic on these streets contributes to overall ambient lighting levels as well.

Lighting for the proposed project would include a continuation of security, landscaping, and perimeter (street) lighting 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. Given the degree of ambient lighting that currently exists in the project area, the proposed lighting would not substantially alter ambient nighttime light levels. In addition, the proposed project would not use highly reflective building materials or large expanses of glass. 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. Consequently, the proposed project would not create a new source of light or glare that would adversely affect day or nighttime views in the area, and impacts would be less than significant. Further analysis in an EIR is not warranted.

4. AGRICULTURAL RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project.

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

☐	☐	☐	☑

WHY? A potentially significant impact would occur if the project were to convert valued farmland to non-agricultural uses. The City of Pasadena is a developed urban area surrounded by hillsides to the north and northwest. The western portion of the City contains the Arroyo Seco, which runs from north to south through the City. It has commercial recreation, park, natural and open space. The City contains no prime farmland, unique farmland, or farmland of statewide importance, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. The project site is located within an urbanized area on one of the City's main commercial streets. The project site does not contain any farmland or agricultural uses, nor are any such lands located within close proximity to the site such that the proposed project could potentially create indirect impacts. Therefore, the proposed project would have no impact to farmland, and further discussion in an EIR is not warranted.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

☐	☐	☐	☑

WHY? See response to checklist question 4.a. A potentially significant impact would occur if the project conflicted with existing agricultural zoning or agricultural parcels enrolled under the Williamson Act. The City of Pasadena has no land zoned for agricultural use other than commercial growing areas. Commercial Growing Area/Grounds is permitted in the CG (General Commercial), CL (Limited Commercial), and IG (General Industrial) zones and conditionally in the RS (Residential Single-Family),and RM (Residential Multi-Family) districts. The project site is located within the Central District Specific Plan Area and is zoned CD5-AD2. Therefore, the proposed project would not conflict with existing zoning laws for agricultural use or a Williamson Act contract. No impact would occur. Further discussion in an EIR is not warranted.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
c. *Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?*	☐	☐	☐	☑

WHY? See responses to checklist questions 4.a and 4.b. A potentially significant impact would occur if the project caused the conversion of farmland to non-agricultural use. There is no known farmland in the City of Pasadena; therefore, the proposed project would not result in the conversion of farmland to a non-agricultural use. No impact would occur, and further discussion in an EIR is not warranted.

5. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?	☑	☐	☐	☐

WHY? The applicable air quality plan for the project site is the 2007 South Coast Air Quality Management Plan (AQMP), developed by the Southern California Air Quality Management District (SCAQMD) and the Southern California Association of Governments (SCAG). A project is considered consistent with the AQMP if (1) the proposed project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP, and (2) the proposed project would not exceed the assumptions in the AQMP in 2010 or increments based on the year of project build-out phase.

The City of Pasadena is within the South Coast Air Basin (SCAB), which is bounded by the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the Pacific Ocean to the south and west. The air quality in the SCAB is managed by the SCAQMD. The SCAB has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are exceeded. Because of the violations of the California Ambient Air Quality Standards (CAAQS), the California Clean Air Act requires triennial preparation of an AQMP. The AQMP analyzes air quality on a regional level and identifies region-wide attenuation methods to achieve the air quality standards. These region-wide attenuation methods include regulations for stationary-source polluters; facilitation of new transportation technologies, such as low-emission vehicles; and capital improvements, such as park-and-ride facilities and public transit improvements.

The most recently adopted plan is the 2007 AQMP, adopted on June 1, 2007. This plan is the SCAB's portion of the State Implementation Plan (SIP). This plan is designed to achieve the five percent annual reduction goal of the California Clean Air Act. The SCAQMD understands that southern California is growing. As such, the AQMP accommodates population growth and transportation projections based on the predictions made by the SCAG. Thus, projects that are consistent with employment and population forecasts are consistent with the AQMP. In addition to the region-wide AQMP, the City of Pasadena participates in a sub-regional air quality plan – the West San Gabriel Valley Air Quality Plan. This plan, prepared in 1992, is intended to be a guide for the 16 participating cities, and identifies methods of improving air quality while accommodating expected growth.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

The proposed project will be further evaluated for consistency with the AQMP. The issue is considered potentially significant and will be further discussed in an EIR.

b. Violate any air quality standard or contribute to an existing or projected air quality violation?

☑	☐	☐	☐

WHY? Due to its geographical location and the prevailing off shore daytime winds, the City of Pasadena receives smog from downtown Los Angeles and other areas in the Los Angeles basin. The prevailing winds, from the southwest, carry smog from wide areas of Los Angeles and adjacent cities, to the San Fernando Valley and to Pasadena in the San Gabriel Valley where it is trapped against the foothills. For these reasons the potential for adverse air quality in Pasadena is high. Pasadena is located in a non-attainment area, an area that frequently exceeds national ambient air quality standards. Due to the size of the project and its potential construction operation and traffic induced air pollutants, the project may violate air quality standards or contribute to an existing or projected air quality violation.

Specifically, the construction phase of the proposed projects could result in emissions of Nitrogen Oxides (NOX) and Particulate Matter (PM10) at levels that could exceed daily thresholds established by the SCAQMD, as well as State and/or federal standards. Grading operations have the highest probability of exceeding established significance thresholds. Implementation of dust abatement measures consistent with SCAQMD Rule 403 may, or may not be effective in reducing PM10 levels below the threshold.

The project will generate Carbon Dioxide, which is the primary component of Greenhouse gases (GHG). Thus, the project will contribute to global climate change as described by the Intergovernmental Panel on Climate Change. The air quality analysis prepared for the project will provide data as to the total tons of CO2 generated during construction and tons per year for operations. Cumulative impacts from GHG's could be potentially significant; therefore this will be analyzed further in the EIR.

Operational emissions and concentrations related to mobile sources (project trip generation and incremental contribution to carbon monoxide (CO) "hot spots" at sensitive receptors may also exceed established SCAQMD thresholds and standards. A traffic study will be prepared, from which a detailed air quality analysis will be conducted for the EIR to determine the extent of potential impacts relative to vehicular (as well as stationary) emissions, and if thresholds would be exceeded, whether such exceedances would substantially contribute to an existing or projected air quality violation. This issue will be analyzed further in an EIR.

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

☑	☐	☐	☐

WHY? The SCAQMD's approach for assessing cumulative impacts to air quality is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and state CAAs. The SCQAMD has set forth regional significance thresholds designed to assistant in the attainment of ambient air quality standards.

As discussed in response 5.a, the City of Pasadena is within the South Coast Air Basin (SCAB). This basin is a non-attainment area for Ozone (O_3), Fine Particulate Matter ($PM_{2.5}$), Respirable Particulate Matter (PM_{10}), and Carbon Monoxide (CO), and is in a maintenance area for Nitrogen Dioxide (NO_2). Projects that

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

contribute to a significant cumulative increase in O_3, $PM_{2.5}$, PM_{10}, CO, or NO_2 will be considered to be significant and require the consideration of mitigation measures. As discussed in Section 5.a and 5.b, the proposed project has the potential to generate emissions that exceed thresholds set forth by the SCAQMD, especially when considered cumulatively with other current and probable projects within the project vicinity. As a result, the proposed project could also contribute to a cumulatively considerable net increase in one or more criteria pollutants for which the region is in nonattainment under federal or state standards. Therefore, cumulative impacts to air quality associated with project-generated emissions would be potentially significant, and this issue will be analyzed further in an EIR.

d. Expose sensitive receptors to substantial pollutant concentrations?

☑	☐	☐	☐

WHY? A substance is considered toxic if it has the potential to cause adverse health effects in humans. A toxic substance released into the air is considered a toxic air contaminant (TAC). The greatest potential for TAC emissions during construction would be diesel particulate emissions associated with heavy equipment operations. Although construction TAC emissions would be short-term with a limited exposure period, impacts would be potentially significant and warrant further study. Upon completion, the proposed project would not generate toxic air pollutants. Construction TAC exposure will be further analyzed in an EIR.

e. Create objectionable odors affecting a substantial number of people?

☐	☐	☑	☐

WHY? 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 project site. The proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites. Additionally, construction activity associated with the proposed project would be required to comply with SCAQMD Rule 402. As such, project construction would not cause an odor nuisance, and odor impacts would be less than significant.

According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The project site would be developed with commercial and retail land uses and not land uses that are associated with odor complaints. While on-site trash receptacles could create adverse odors, they would be enclosed and 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 in violation of SCAQMD Rule 402. No significant impacts would occur, and further analysis in an EIR is not warranted.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

6. BIOLOGICAL RESOURCES. Would the project:

a. *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

☐ ☐ ☐ ☑

WHY? A project would have a significant biological impact through the loss or destruction of individuals of a species or through the degradation of a sensitive habitat. The project site is located within a developed urban area on one of the City's main commercial streets. There are no known unique, rare or endangered plants or animal species or habitats on or near the project site. No definable natural plant communities (beyond ornamental landscaped areas), provide habitat for species of invertebrate, plant, or wildlife listed by the United States Fish and Wildlife Services or California Department of Fish and Game that are facing extinction throughout all or a significant portion of its geographic range, are present on the project site. In addition, the City has not identified the project site as being located on a natural habitat area. Consequently, the proposed project would not have a substantial adverse effect on any candidate, sensitive, or special-status species listed by the California Department of Fish and Game or U.S. Fish and Wildlife Service, and no impact would occur. Further analysis in an EIR is not warranted.

b. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

☐ ☐ ☑ ☐

WHY? A potentially significant impact would occur if any riparian habitat or natural community were lost or destroyed as a result of urban development. Natural habitat areas within the City's boundaries are located in the upper and lower portions of the Arroyo Seco, the City's western hillside area, and Eaton Canyon. The project site is not located near any of these natural habitat areas, rather within the City's Central District, which is entirely urbanized. Furthermore, the project site is entirely developed with structures, paving and concrete. While there are 36 trees on the site and two of the trees appear to meet the size criteria for protection under the City's Tree Protection Ordinance based on the tree inventory prepared in March 2009 (see response to checklist question 5.e), there are no sensitive natural plant communities, such as wetlands, oak woodland, and habitat conservation planning areas are found on the site. Therefore, no impact would occur with respect to this issue, and further analysis in an EIR is not warranted.

c. *Have a substantial adverse effect of federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

☐ ☐ ☐ ☑

WHY? A potentially significant impact would occur if federally protected wetlands would be modified or removed by a project. Drainage courses with definable bed and bank and their adjacent wetlands are "waters of the United States" and fall under the jurisdiction of the U.S. Army Corps of Engineers (USACE) in accordance with Section 404 of the Clean Water Act. Jurisdictional wetlands, as defined by the USACE are lands that, during normal conditions, possess hydric soils, are dominated by wetland vegetation, and are inundated with water for a portion of the growing season. The project site is located within a developed urban area and does not include any drainage courses, inundated areas, wetland vegetation, or hydric soils,

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

and thus does not include USACE jurisdictional drainages or wetlands. Therefore, the proposed project would have no impact to federally protected wetlands as defined by Section 404 of the Clean Water Act. Further analysis in an EIR is not warranted.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

☐	☐	☐	☑

WHY? A potentially significant impact would occur if the proposed project would interfere with or remove access to a migratory wildlife corridor or impede use of native wildlife nursery sites. The project site is located within a developed urban area and does not function as a wildlife corridor, nor would the proposed project result in a barrier to migration or movement. Therefore, the project will have no impact to wildlife movement, and further analysis in an EIR is not warranted.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

☐	☐	☑	☐

WHY? A potentially significant impact would occur if the proposed project were inconsistent with local regulations pertaining to biological resources. The project site and surrounding area are currently developed and do not contain any notable natural features or protected biological resources. The only local ordinance protecting biological resources in the City of Pasadena is Ordinance No. 6896 “City Trees and Tree Protection Ordinance”. The applicant has submitted the Application for a Public Tree Removal Request for the removal of 36 trees. Based on the tree inventory prepared for the project site in March 2009, two of the trees are on the City of Pasadena’s Specimen Tree List and appear to meet the size criteria to be protected under the City’s Protective Tree Ordinance. The protected trees proposed for removal include a 32” Indian laurel fig and a 16.5” Rosy-red ironbark. Therefore, the removal of these two trees would be subject to the City’s tree protection ordinance requiring replacement as a condition of project approval. The impact to local policies and ordinances protecting biological resources would be less than significant with application approval and compliance with the City’s tree protection requirements. Further analysis in an EIR is not warranted

f. Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan?

☐	☐	☐	☑

WHY? A potentially significant impact would occur if the proposed project were inconsistent with any adopted habitat conservation plans. Currently, there are no adopted Habitat Conservation or Natural Community Conservation Plans within the City of Pasadena. There are also no approved local, regional or state habitat conservation plans in Pasadena. Therefore, no impact would occur with respect to this issue, and further analysis in an EIR is not warranted.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

7. CULTURAL RESOURCES. Would the project:

a. *Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?*

☑	☐	☐	☐

WHY? A potentially significant impact would occur if the project's substantially altered the environmental context or removed identified historical resources. Section 15064.5 of the CEQA Guidelines generally defines historical significance as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural or cultural annals of California. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. The proposed project involves the renovation of the existing former Constance Hotel, which was originally constructed in 1926, demolition of existing commercial uses and new development of additional hotel, restaurant, office, retail and limited (five units) residential uses. The City Council determined that the Constance Hotel building qualifies for designation under Criterion "A" for landmark designation (PMC §17.52.40) as a representative example of the tourist hotel property type constructed in a significant period in the City's history under the historic context theme of tourism. The hotel would be renovated and retained within the project site; however, all other existing structures would be removed to accommodate the proposed project. The renovation and addition to the hotel would potentially result in a significant impact on an historic resource. In addition, construction of new buildings would potentially impact the historic setting in which the hotel is located. Therefore, an Architectural/Historical Resources Evaluation (with the required photograph(s)) will be prepared, and the results of the evaluation will be reviewed by the Historic Preservation Commission. Impacts to historic resources would be potentially significant, and this issue will be analyzed further in an EIR.

b. *Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*

☐	☐	☑	☐

WHY? A potentially significant impact would occur if a known or unknown archaeological resource were removed, altered, or destroyed as a result of the proposed development. There are no known prehistoric or historic archeological sites on the project site, and the project site does not contain undisturbed surficial soils. As previously discussed, the project site is currently developed with the former Constance Hotel, various one-story retail and restaurant uses, a one-story bank, and a two-story parking garage. Approximately 110,780 of material would to be excavated for subterranean parking, and development of the proposed project would also involve grading to establish building pads and develop onsite infrastructure. If archaeological resources once existed on-site, it is likely that previous grading, construction, and modern use of the project site have either removed or destroyed them. The project site is not located in an area of the City that has been identified as archeologically sensitive. However, when any project proposes to excavate large areas/amounts of previously undisturbed soil there are standard mitigation measures applied to the project that reduce any potential impacts to less than significant. Therefore, the proposed project would have less than significant impacts to archaeological resources, and further analysis in an EIR is not warranted.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
c. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*	☐	☐	☑	☐

WHY? A potentially significant impact would occur if excavation or construction activities associated with the project would disturb paleontological or unique geological features, which presently occur within the proposed development site. The project site lies on the valley floor in an urbanized portion of the City of Pasadena. This portion of the City does not contain any unique geologic features and is not known or expected to contain paleontologicial resources. If paleontologicial resources once existed on-site, it is likely that previous grading, construction, and modern use of the project site have either removed or destroyed them. The project site is not located in an area of the City that has been identified as being sensitive for paleontological resources. However, when any project proposes to excavate large areas/amounts of previously undisturbed soil there are standard mitigation measures applied to the project that reduce any potential impacts to less than significant. Therefore, the proposed project would not destroy a unique paleontological resource or unique geologic feature, and further analysis in an EIR is not warranted.

d. Disturb any human remains, including those interred outside of formal ceremonies?	☐	☐	☑	☐

WHY? A potentially significant impact would occur if previously interred human remains were disturbed during excavation of the project site. There are no known human remains on the site. The project site is not part of a formal cemetery and is not known to have been used for disposal of historic or prehistoric human remains. Thus, human remains are not expected to be encountered during construction of the proposed project. In the unlikely event that human remains are encountered during project construction, State Health and Safety Code Section 7050.5 requires the project to halt until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resources Code Section 5097.98. Compliance with these regulations would ensure the proposed project would result in a less than significant impact to unknown human remains. Further analysis in an EIR is not warranted.

8. ENERGY. Would the proposal:

a. Conflict with adopted energy conservation plans?	☐	☐	☑	☐

WHY? The proposed project has committed to pursuing a Leadership in Energy and Environmental Design (LEED) certification under the US Green Building Council (USGBC) consistent with the City of Pasadena's Green Building Program. Specifically, the project intends to pursue LEED NC 2.2 Certification for New Buildings and Major Renovations for each building. Refinement of specific features will be developed as the proposed project moves further along in the design and entitlements processes. However, in any instance, the proposed project will be required to comply with all pre-requisites in the five primary categories of Sustainable Sites, Water Efficiency, Energy and Atmosphere, Materials and Resources, and Indoor Environmental Quality. The following project thresholds and LEED levels are requirements of the City's Green Building Practices Ordinance potentially applicable to the proposed project:

- All non-residential buildings of 25,000 square feet or more of new gross floor area must meet the intent of LEED Certified level at a minimum; larger commercial/institutional type buildings of 50,000 square feet or more must meet LEED Silver level.

- Tenant improvements of 25,000 square feet or more of gross floor area and requiring a building permit as determined by the building official or designee must meet the intent of LEED Certified level at a minimum.

- Mixed-use projects and multi-family residential projects that include a residential building of four stories or more in height must meet the intent of LEED Certified level at a minimum.

- Commercial type buildings of over 50,000 square feet or more must meet the intent of LEED Silver at a minimum.

- All projects subject to the ordinance must achieve LEED credit 3.1 Water Efficiency (exceed the baseline water projection by 20%)

While only municipal projects are required to attain official recognition by the USGBC, the City offers substantial financial incentives for projects receiving certification and for those seeking voluntary compliance. Furthermore, the applicant has committed to LEED certification for each of the project buildings. The proposed project also does not conflict with the 1983 adopted Energy Element of the General Plan. The intensity of the proposed project is within the intensity allowed by the Zoning Code and envisioned in the City's approved General Plan. Furthermore, the proposed project would comply with the energy standards in the California Energy Code, Part 6 of the California Building Standards Code (Title 24). Measures to meet these performance standards may include high-efficiency Heating Ventilation and Air Conditioning (HVAC) and hot water storage tank equipment, lighting conservation features, higher than required rated insulation and double-glazed windows. Compliance with these regulations would ensure the proposed project would not conflict with adopted energy conservation plans. Impacts would be less than significant impact, and further analysis in an EIR is not warranted.

Global Climate Change/Greenhouse Gases

In response to growing scientific and political concern with global climate change, California has recently adopted a series of laws to reduce emissions of greenhouse gases (GHGs) to the atmosphere from commercial and private activities within the State. In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 focuses on reducing GHG emissions in California, and requires the California Air Resources Board (CARB), the State agency charged with regulating statewide air quality, to adopt rules and regulations that would achieve greenhouse gas emissions equivalent to statewide levels in 1990 by 2020. To achieve this goal, AB32 mandates that the CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. Because, the intent of AB 32 is to limit 2020 emissions to the equivalent of 1990, and the present year (2008) is near the midpoint of this timeframe, it is expected that the regulations would affect many existing sources of greenhouse and not just new general development projects. Senate Bill (SB) 1368, a companion bill to AB 32, requires the California Public Utilities Commission and CEC to establish GHG emission performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the State.

Generally, an individual project cannot generate enough greenhouse gas emissions to influence global climate change because it is the increased accumulation of greenhouse gases which may result in global climate change. However, an individual project may contribute an incremental amount of GHG emissions that could combine with other emission sources and to create concentrations of GHG that could influence climate change. For most projects, the main contribution of GHG emissions is from motor vehicles. These emissions will be quantified along with GHG emissions from natural gas use, standard electricity use, and

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

electricity use associated with the movement and consumption of potable water. In addition, as discussed above, the proposed project would pursue LEED certification. LEED certification would reduce GHG emissions through various energy conservation tactics. However, the project-related GHG emissions warrant further analysis in an EIR to determine if emissions would result in a cumulatively considerable global climate change impact. This topic will be discussed in the Air Quality section in the EIR.

b. Use non-renewable resources in a wasteful and inefficient manner?

☐	☐	☑	☐

Why? The proposed project would not create a high enough demand for energy to require development of new energy sources. Construction of the proposed project would result in a temporary consumption of oil-based energy products. However, the additional amount of resources used would not cause a significant reduction in available supplies. The long-term impact from increased energy use by the proposed project is not significant in relationship to the number of customers currently served by the electrical and gas utility companies. Supplies are available from existing mains, lines and substations in the area. Operation of the proposed project would increase the consumption of natural gas (net increase of 10,885 cubic feet/day above existing use). However, this consumption would be lessened by adherence to the performance standards of California Energy Code, Part 6 of the California Building Standards Code Title 24. The proposed project would result in the increased consumption of an estimated 7,507 net kilowatt hours of electrical energy per day as compared with the existing use. Impacts related to this increased consumption would be less than significant by meeting the above referenced energy standards. Measures to meet these performance standards may include high efficiency Heating Ventilation and Air Conditioning (HVAC) and hot water storage tank equipment, lighting conservation features, higher than required rated insulation and double-glazed windows. The energy conservation measures would be prepared by the developer and shown on a building plan(s). Plans would be submitted to the Water and Power Department and Building Official for review and approval prior to the issuance of a building permit. Installation of energy-saving features would be inspected by a Building Inspector prior to issuance of a Certificate of Occupancy. In addition, as discussed in response to checklist question 8.a, the proposed project has committed to pursuing a LEED certification under the US Green Building Council (USGBC) consistent with the City of Pasadena's Green Building Program.

The proposed project would result in an increase of approximately 34,285 gallons per day in water consumption above the existing use. However, this impact would be mitigated during drought periods through adherence to the Water Shortage Procedures Ordinance, which restricts water consumption to 90% of expected consumption during each billing period. Installation of plumbing would be inspected by a Building Inspector prior to issuance of a Certificate of Occupancy. Impacts related to non-renewable resources would be less than significant through compliance with the aforementioned standard requirements.

In December of 2007 the City of Pasadena also enacted a Water Shortage Plan I under Pasadena Municipal Code §13.10.040. In addition, the City anticipates statewide water demand reduction requirements beginning in 2009, as a result of Governor Arnold Schwarzenneger's 2008 20% reduction by 2020 ("20x2020"), and the current work being done by the California Department of Water Resources, the State Water Resources Control Board, and other state agencies to implement the Governor's 20x2020 Water Conservation Initiative Program. As a result, to meet these policy goals, the proposed project must comply with the Water Shortage Procedures Ordinance and the City's goal to meet the 20x2020 goals by submitting a water-conservation plan limiting the water consumption to 80% of its originally anticipated amount. With submission of this plan, the proposed project would not have any individual or cumulative impacts on water supply. This plan is subject to review and approval by the City's Water and Power Department and the Building Division before the issuance of a building permit. The applicant's irrigation

and plumbing plans are also required to comply with the approved water-conservation plan. Therefore, compliance with the above energy and water conservation standards would ensure the impacts of the proposed project would be less than significant. However, further analysis of cumulative project impacts with regard to water supplies will be evaluated in the EIR (see response to checklist question 19.d).

9. GEOLOGY AND SOILS. Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

☐	☐	☑	☐

WHY? A potentially significant impact would occur if the proposed project caused personal injury or death or resulted in property damage as a result of a fault rupture occurring on a project site. The Preliminary Geotechnical Report prepared for the proposed project states that no active or potentially active faults underlie the project site, and the project site is not located within any Alquist-Priolo Earthquake Fault zone, as set forth by the California State Mining and Geology Board. In addition, according to the 2002 adopted Safety Element of the City of Pasadena's General Plan, the San Andreas Fault is a "master" active fault and controls seismic hazard in Southern California. This fault is located approximately 21 miles north of Pasadena. The County of Los Angeles and the City of Pasadena are both affected by Alquist-Priolo Earthquake Fault Zones. Pasadena is in four USGS Quadrants, the Los Angeles, and the Mt. Wilson quadrants were mapped for earthquake fault zones under the Alquist-Priolo Act in 1977. The Pasadena and Condor Peak USGS Quadrangles have not yet been mapped per the Alquist-Priolo Act.

These Alquist-Priolo maps show only one Fault Zone in or adjacent to the City of Pasadena, the Raymond (Hill) Fault Alquist-Priolo Earthquake Fault Zone. This fault is located primarily south of City limits, however, the southernmost portions of the City lie within the fault's mapped Fault Zone. The 2002 Safety Element of the City's General Plan identifies the following three additional zones of potential fault rupture in the City:

- The Eagle Rock Fault Hazard Management Zone, which traverses the southwestern portion of the City;
- The Sierra Madre Fault Hazard Management Zone, which includes the Tujunga Fault, the North Sawpit Fault, and the South Branch of the San Gabriel Fault. This Fault Zone is primarily north of the City, and only the very northeast portion of the City and portions of the Upper Arroyo lie within the mapped fault zone.
- A Possible Active Strand of the Sierra Madre Fault, which appears to join a continuation of the Sycamore Canyon Fault. This fault area traverses the northern portion of the City as is identified as a Fault Hazard Management Zone for Critical Facilities Only.

The project site is not within any of these potential fault rupture zones. Furthermore, the proposed project, including the renovations to the former Constance Hotel (originally constructed in 1926), would be designed and constructed in accordance with State and local building codes to reduce the potential for exposure of people or structures to seismic risks. The project would comply with the California Department of Conservation, Division of Mines and Geology (CDMG) Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California (1997), which provides guidance for the evaluation and mitigation of earthquake-related liquefaction, and with the seismic safety requirements in the California Building Code. Preliminary data suggests that liquefaction potential at the site is very low. Therefore, the

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

proposed project would not expose people or structures to potential substantial adverse effects caused by the rupture of a known fault. No related significant impacts would result from the proposed project, and further analysis in an EIR is not warranted.

ii. Strong seismic ground shaking?

☐	☐	☑	☐

WHY? See response to checklist question 9.a.i. A potentially significant impact would occur if the proposed project caused personal injury or death or resulted in property damage as a result of seismic ground shaking. Since the City of Pasadena is within a larger area traversed by active fault systems, such as the San Andreas and Newport-Inglewood Faults, any major earthquake along these systems would cause seismic ground shaking in Pasadena. Much of the City is on sandy, stony or gravelly loam formed on the alluvial fan adjacent to the San Gabriel Mountains. This soil is more porous and loosely compacted than bedrock, and thus subject to greater impacts from seismic ground shaking than bedrock.

As discussed in response to checklist question 9.a.i, the Preliminary Geotechnical Report prepared for the proposed project states that no active or potentially active faults underlie the project site, and the project site is not located within any Alquist-Priolo Earthquake Fault zone, as set forth by the California State Mining and Geology Board. The Preliminary Geotechnical Report further states that the potential for ground surface rupture is considered to be low. Furthermore, the risk of earthquake damage is minimized because new and renovated structures shall be built according to the Uniform Building Code and other applicable codes, and are subject to inspection during construction. Structures for human habitation must be designed to meet or exceed California Uniform Building Code standards for Seismic Zone D or E. Conforming to these required standards would ensure the proposed project would not result in significant impacts due to strong seismic ground shaking, and further analysis in an EIR is not warranted.

iii. Seismic-related ground failure, including liquefaction as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of liquefaction?

☐	☐	☑	☐

WHY? A potentially significant impact could occur if the proposed project caused personal injury or death or resulted in property damage as a result of liquefaction or other ground failure caused by groundshaking. According to the 2002 adopted Safety Element of the City's General Plan the project site is underlain by alluvial material from the San Gabriel Mountains. Liquefaction, which is also commonly observed during earthquakes, is a phenomenon where saturated sands lose their strength during an earthquake and become fluid-like and mobile. As a result, the ground may undergo large permanent displacements that can damage underground utilities and well-built surface structures. The type of displacement of major concern associated with liquefaction is lateral spreading because it involves displacement of large blocks of ground down gentle slopes or towards stream channels. Liquefaction occurs in saturated sands, thus groundwater or a water source in combination with sandy soils is necessary for liquefaction

The project site is not within a Liquefaction Hazard Zone or Landslide Hazard Zone as shown on Plate P-1 of the 2002 Safety Element of the General Plan. This Plate was developed considering the Liquefaction and Earthquake-Induced Landslide areas as shown on the State of California Seismic Hazard Zone maps for the City. Therefore, the proposed project would not result seismic related ground failure, including liquefaction and would have a less than significant impact. Further analysis in an EIR is not warranted.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
iv. Landslides as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of landslides?	☐	☐	☐	☑

WHY? A potentially significant impact would occur if the project site were located in a hillside area with unstable geological conditions or soil types that would be susceptible to failure when saturated. The project site is not within a Landslide Hazard Zone as shown on Plate P-1 of the 2002 Safety Element of the General Plan. This Plate was developed considering the Earthquake-Induced Landslide areas as shown on the State of California Seismic Hazard Zone maps for the City. The project site is level and urbanized and is not located in the vicinity of any slopes. The project site is located about two miles east of the San Rafael Hills and about four miles west of the San Gabriel Mountains. The project site is not susceptible to landslide hazards. Therefore, there would be no impact with respect to landslide hazards, and further analysis in an EIR is not warranted.

b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☑	☐

WHY? A potentially significant impact would occur if construction activities or future uses resulted in substantial soil erosion or loss of topsoil. The project site is currently developed with the former Constance Hotel, various one-story retail and restaurant uses, a one-story bank, and a two-story parking garage. There are few sources of natural erosion; however, excavation of approximately 110,780 cubic yards of material for subterranean parking, new buildings and associated engineering requirements could create sources of short-term erosion during the grading phase of construction, should there be substantial rainfall during that phase. The natural water erosion potential of soils in Pasadena is low, unless these soils are disturbed during the wet season. Both the Ramona and Hanford soils associations, which underlay much of the City, have high permeability, low surface runoff and slight erosion hazard due to the gravelly surface layer and low topographic relief away from the steeper foothill areas of the San Gabriel Mountains. The displacement of soil through cut and fill will be controlled by the City's grading ordinance, Chapter 33 of the 2001 California Building Code relating to grading and excavation, other applicable building regulations and standard construction techniques, including required Best Management Practices (BMPs). Water erosion during construction will be minimized by limiting construction to dry weather, covering exposed excavated dirt during periods of rain and protecting excavated areas from flooding with temporary berms. The project applicant will also be required to have an erosion and sediment transport plan as part of the grading plan. The grading plan must be approved by the Building Official and the Public Works Department prior to the issuance of any building permits. Any potential for erosion will be further controlled as mandated by SCAQMD Rule 403 dust prevention measures, and regulatory requirements as imposed by other responsible agencies, including the Los Angeles Regional Water Quality Control Board and conditions of the grading permits. Soil erosion after construction will be controlled by implementation of an approved landscape and irrigation plan. This plan shall be submitted for review and approval prior to the issuance of a building permit. Regulatory compliance with all applicable State, regional and local erosion control measures would ensure the proposed project would have a less than significant impact relative to soil erosion during project construction. Further analysis in an EIR is not warranted.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
c. *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*	☐	☐	☑	☐

WHY? A potentially significant impact would occur if any unstable geological conditions resulted in any type of geological failure, including lateral spreading, offsite landslides, lateral spreading, liquefaction, or collapse. The City of Pasadena rests primarily on an alluvial plain. To the north the San Gabriel Mountains are relatively new in geological time. These mountains run generally east-west and have the San Andreas Fault on the north and the Sierra Madre Fault to the south. The action of these two faults in conjunction with the north-south compression of the San Andreas tectonic plate is pushing up the San Gabriel Mountains. This uplifting combined with erosion has helped form the alluvial plain. As shown on Plate 2-4 of the Technical Background Report to the 2002 Safety Element, the majority of the City lies on the flat portion of the alluvial fan, which is expected to be stable.

The project site is not located on known unstable soils or geologic units, and therefore, would not likely cause on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse. Prior to the issuance of a grading permit, the consulting geologist and soils engineer shall review and approve project grading plans. Modern engineering practices and compliance with established building standards, including the California Building Code, will ensure the proposed project will not cause any significant impacts from unstable geologic units or soils. Further analysis in an EIR is not warranted.

d. *Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?*	☐	☐	☑	☐

WHY? A potentially significant impact would occur if expansive soils cause risks to persons or property. According to the 2002 adopted Safety Element of the City's General Plan the project site is underlain by alluvial material from the San Gabriel Mountains. This soil consists primarily of sand and gravel and is in the low to moderate range for expansion potential. The proposed project will be required to comply with Chapter 33 of the UBC per the City's grading ordinance and any conditions arising out of the plan check and building inspection process with the City. As part of that process, a detailed geotechnical report will determine specific foundation requirements for all structures, prior to the issuance of any grading or building permits. This would effectively address any potential impact that could occur due to expansive soils. Thus, impacts would be reduced to a less than significant level, and further analysis in an EIR is not warranted.

e. *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*	☐	☐	☐	☑

WHY? A potentially significant impact would occur if an adequate wastewater disposal system is not available. The proposed project is located in an urbanized area served by existing public infrastructure, including sewers. The proposed project would be required to connect to the existing sewer system. Therefore, soil suitability for septic tanks or alternative wastewater disposal systems is not applicable in this case, and the proposed project would have no associated impacts with regards to this issue. Further analysis in an EIR is not warranted.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

10. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?

☐ ☐ ☑ ☐

WHY? A potentially significant impact would occur if the proposed project required the routine transfer, use, or disposal of hazardous materials. Construction of the proposed project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Operation of the proposed project would involve the limited use and storage of common hazardous substances typical of those used in hotel, condominium, office, retail and restaurant developments. Hazardous materials expected for occasional use could include limited quantities of lubricating products, paints, solvents, and custodial products, pesticides and other landscaping supplies, and vehicle fuels, oils, and transmission fluids. No industrial uses or activities are proposed that would result in the use or discharge of unregulated hazardous materials and/or substances, or create a public hazard through transport, use, or disposal. The proposed project would not generate large amounts of hazardous materials that would require routine transport, use, or disposal. Use of these materials must adhere to applicable zoning and fire regulations regarding the use and storage of any hazardous substances. All hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations, and would not pose significant hazards to the public or the environment. Therefore, impacts related to the routine transport, use or disposal of hazardous materials would be less than significant, and further analysis in an EIR is not warranted.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

☐ ☐ ☐ ☑

WHY? A potentially significant impact would occur if the proposed project created a significant hazard to the public or environment due a reasonably foreseeable release of hazardous materials. The proposed project involves renovation of the existing former hotel, demolition of existing commercial uses and new development of additional hotel, restaurant, office, retail and residential uses. The proposed project does not involve hazardous materials. All demolition and renovation activities shall comply with SCAQMD Rule 1403 (Asbestos Emissions from Renovation/Demolition Activities) for all demolition/renovation work. Therefore, there is no significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, which could release hazardous material. Further discussion in an EIR is not warranted.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

☐ ☐ ☑ ☐

WHY? A potentially significant impact would occur if the release of hazardous materials from the proposed project were to occur within one-quarter-mile of an existing or proposed school. The project site is located approximately 0.4 miles northeast of the McKinley K-8 School (Pasadena Unified School District). The

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

proposed project would not involve hazardous emissions or the handling of hazardous materials, substances, or waste. Therefore, hazardous material related impacts to schools would be less than significant. Further discussion in an EIR is not warranted.

d. *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

☐	☐	☑	☐

WHY? A potentially significant impact would occur if the site is listed pursuant to Government Code Section 65962.5. The Phase I Environmental Site Assessment prepared of the project site reviewed readily available environmental databases maintained by federal, state and local agencies. The project site was identified on the Federal Emergency Response Notification System (ERNS), HAZNET and Emissions Inventory Data (EMI) lists. However, the assessment revealed no evidence of recognized environmental conditions in connection with the project site. The project site is not located on the State of California Hazardous Waste and Substances Sites List of sites published by California Environmental Protection Agency (CAL/EPA). The site is not known or anticipated to have been contaminated with hazardous materials and no hazardous material storage facilities are known to exist onsite. The proposed project would not create a significant hazard to the public or the environment and would have a less than significant impact. Further discussion in an EIR is not warranted.

e. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?*

☐	☐	☐	☑

WHY? A potentially significant impact would occur if the proposed project exposed persons residing or working in the area to risks associated with the proximity of an airport. The project site is not within an airport land use plan or within two miles of a public airport or public use airport. The nearest public use airport is the Bob Hope Airport in Burbank, which is operated by a Joint Powers Authority with representatives from the Cities of Burbank, Glendale and Pasadena. Bob Hope Airport is 15 miles northwest of the project site. Therefore, the proposed project would not result in a safety hazard for people residing or working in the vicinity of an airport and would have no impact with regard to this issue. Further discussion in an EIR is not warranted

f. *For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*

☐	☐	☐	☑

WHY? A potentially significant impact would occur if the proposed project exposed persons residing or working in the area to risks associated with the proximity of an airstrip. The project site is not within the vicinity of a private airstrip. Therefore, the proposed project would not result in a safety hazard for people residing or working in the vicinity of a private airstrip and would have no associated impacts.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☑	☐

WHY? A potentially significant impact would occur if the proposed project impaired the implementation of an emergency response or evacuation plan or blockage of an emergency route. The City of Pasadena maintains a citywide emergency response plan, which goes into effect at the onset of a major disaster (e.g., a major earthquake). The Pasadena Fire Department maintains the disaster plan. In case of a disaster, the Fire Department is responsible for implementing the plan, and the Pasadena Police Department devises evacuation routes based on the specific circumstance of the emergency. The City has pre-planned evacuation routes for dam inundation areas associated with Devil's Gate Dam, Eaton Wash, and the Jones Reservoir. The construction and operation of the proposed project would not place any permanent or temporary physical barriers on any existing public streets. To ensure compliance with zoning, building and fire codes, the applicant is required to submit appropriate plans for plan review prior to the issuance of a building permit. Adherence to these requirements ensures that the proposed project would not have a significant impact on emergency response and evacuation plans. Further discussion in an EIR is not warranted.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☑	☐

WHY? A potentially significant impact would occur if the proposed project exposed people and structures to high risk of wildfire. As shown on Plate P-2 of the 2002 Safety Element, the project site is not in an area of moderate or very high fire hazard. In addition, the project site is surrounded by urban development and not adjacent to any wildlands. Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury or death involving wild land fires. Impacts associated with wildland fires would be less than significant and further discussion in an EIR is not warranted.

11. HYDROLOGY AND WATER QUALITY. Would the project:

a. *Violate any water quality standards or waste discharge requirements?*	☐	☐	☑	☐

WHY? A potentially significant impact would occur if the proposed project violated any water quality or waste discharge requirements. Section 303 of the federal Clean Water Act requires states to develop water quality standards to protect the beneficial uses of receiving waters. In accordance with California's Porter/Cologne Act, the Regional Water Quality Control Boards (RWQCBs) of the State Water Resources Control Board (SWRCB) are required to develop water quality objectives that ensure their region meets the requirements of Section 303 of the Clean Water Act.

Pasadena is within the greater Los Angeles River watershed, and thus, within the jurisdiction of the Los Angeles RWQCB. The Los Angeles RWQCB adopted water quality objectives in its Stormwater Quality Management Plan (SQMP). This SQMP is designed to ensure stormwater achieves compliance with receiving water limitations. Thus, stormwater generated by a development that complies with the SQMP does not exceed the limitations of receiving waters, and thus does not exceed water quality standards.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

Compliance with the SQMP is ensured by Section 402 of the Clean Water Act, which is known as the National Pollution Discharge Elimination System (NPDES). Under this section, municipalities are required to obtain permits for the water pollution generated by stormwater in their jurisdiction. These permits are known as Municipal Separate Storm Sewer Systems (MS4) permits. Los Angeles County and 85 incorporated Cities therein, including the City of Pasadena, obtained an MS4 (Permit # 01-182) from the Los Angeles RWQCB, most recently in 2001. Under this MS4, each permitted municipality is required to implement the SQMP.

In accordance with the County-wide MS4 permit, all new developments must comply with the SQMP. In addition, as required by the MS4 permit, the City of Pasadena has adopted a Standard Urban Stormwater Mitigation Plan (SUSMP) ordinance to ensure new developments comply with SQMP. This ordinance requires most new developments to submit a plan to the City that demonstrates how the proposed project would comply with the City's SUSMP.

Water quality on developed urban site in the greater Los Angeles area is generally heavily degraded by runoff from surface streets and parking areas. As an urban development, the proposed project would add typical, urban, nonpoint-source pollutants such as oil and grease, suspended solids, metals, gasoline, pesticides, and pathogens from paved areas to storm water runoff to storm water runoff. As discussed, these pollutants are permitted by the County-wide MS4 permit, and would not exceed any receiving water limitations. As with current conditions, runoff would discharge into the existing drainage infrastructure and not directly into any surface waters. Increased vehicular traffic and parking demands could increase the concentration of pollutants in runoff from the site from automobile use. Typical pollutants from automobiles include oil, grease, rubber, metals and hydrocarbons. Additional urban pollutants can be generated from trash, leaf fall and application of pesticides associated with landscape maintenance. The project would not introduce noxious uses or high levels of industrial pollutants.

Although pollutant concentrations may increase, overall stormwater runoff quality would not be expected to significantly change from current developed conditions. Prior to the issuance of any demolition, grading, or construction permits, the applicant is required to submit a detailed plan including SUSMP compliance. The City requires submittal of a detailed plan indicating the method of SUSMP compliance to the Department of Public Works for review and approval prior to issuance of any building permits. These plans must incorporate Best Management Practices (BMPs) to limit the discharge of sedimentation and pollutants during both construction and operation. All aspects of the project during construction and operation are also required to comply with NPDES standards. Under the NPDES, the RWQCB requires projects to filter or retain the first ¾ inch of stormwater on-site. Compliance with all of these requirements would ensure that the proposed project would not violate any water quality standards or waste discharge requirements. The project's effect on water quality standards and waste discharge requirements would be less than significant.

b. *Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?*

☐	☐	☑	☐

WHY? A potentially significant impact would occur if the proposed project would substantially deplete groundwater or interfere with groundwater discharge (historic groundwater depth exceeds 100 feet in the project area). The proposed project would not install any groundwater wells, and would not otherwise directly withdraw any groundwater. In addition, there are no known aquifer conditions at the project site or

in the surrounding area, which could be intercepted by excavation or development of the project. Therefore, the proposed project would not physically interfere with any groundwater supplies.

The proposed project would use the existing water supply system provided by the Pasadena Department of Water and Power. The source of some of this water supply is groundwater, stored in the Raymond Basin. Thus, the proposed project could indirectly withdraw groundwater. However, the proposed water usage would be negligible in comparison to the overall water service provided by the Department of Water and Power. This minor amount of water use would not result in significant impacts from depletion of groundwater supplies. Under normal operation the proposed project will use approximately 49,924 gallons of water per day which is an increase of 34, 285 gallons per day.

In December of 2007 the City of Pasadena also enacted a Water Shortage Plan I under Pasadena Municipal Code §13.10.040. In addition, the City anticipates statewide water demand reduction requirements beginning in 2009, as a result of Governor Arnold Schwarzenneger's 2008 20% reduction by 2020 ("20x2020"), and the current work being done by the California Department of Water Resources, the State Water Resources Control Board, and other state agencies to implement the Governor's 20x2020 Water Conservation Initiative Program. As a result, to meet these policy goals, the proposed project must comply with the Water Shortage Procedures Ordinance and the City's goal to meet the 20x2020 goals by submitting a water-conservation plan limiting the water consumption to 80% of its originally anticipated amount. With submission of this plan, the proposed project will not have any individual or cumulative impacts on water supply. This plan is subject to review and approval by the City's Water and Power Department and the Building Division before the issuance of a building permit. The applicant's irrigation and plumbing plans are also required to comply with the approved water-conservation plan. Regulatory compliance with all applicable State, regional and local control measures would ensure the proposed project would have a less than significant impact relative to groundwater supplies or groundwater recharge. Further analysis in an EIR with respect to groundwater recharge is not warranted.

As discussed above, the proposed project's daily water demand would be an estimated 49,924 gallons per day (gpd). The existing uses on the project site have an estimated daily water demand of 15,638 gpd. Therefore, the net increase in water consumption would be 34,285 gpd. During periods of drought, this project would be required to comply with the City's Water Shortage Procedures Ordinance, which reduces monthly water consumption to 90% of the expected consumption for this type of land use. Furthermore, the proposed project has committed to pursuing a LEED certification consistent with the City of Pasadena's Green Building Program. Specifically, the project intends to pursue LEED NC 2.2 Certification for New Buildings and Major Renovations for each building. Refinement of specific features will be developed as the proposed project moves further along in the design and entitlements processes. However, in any instance, the proposed project will be required to comply with all pre-requisites in the five primary categories of Sustainable Sites, Water Efficiency, Energy and Atmosphere, Materials and Resources, and Indoor Environmental Quality. Therefore, the proposed project will incorporate water conservation design features that would further offset future demands. The project's impact with regard to water supplies will be discussed in the EIR (see response to checklist question 19.d).

c. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on-or off-site?*

☐	☐	☑	☐

WHY? A potentially significant impact would occur if the proposed project substantially altered the drainage pattern of an existing stream or river so that erosion or siltation would result. There are no streams or rivers located in the project vicinity. The project site is located in a highly urbanized area, and the site is level and

does not contain any streams, rivers, or other natural drainage features. Development of the project site would require approximately 110,780 cubic yards of material to be excavated for subterranean parking, and also involve minor grading to establish building pads and develop onsite infrastructure. However, the drainage pattern of the project site or surrounding area would not substantially altered. The drainage of surface water from the project site would be controlled by building regulations and directed towards the City's existing streets, flood control channels, storm drains and catch basins. Prior to the issuance of a building permit, the applicant is required to submit a site drainage plan to the Building Division and the Public Works Department for review and approval. This required approval ensures that the proposed drainage plan is appropriately designed and that the proposed runoff does not exceed the capacity of the City's storm drain system. The proposed drainage of the site would not channel runoff on exposed soil, would not direct flows over unvegetated soils, and would not otherwise increase the erosion or siltation potential of the site or any downstream areas. Therefore, impacts associated with erosion or siltation from changes to drainage patterns would be less than significant. Further discussion of this impact in an EIR is not warranted.

d. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?*

☐	☐	☑	☐

WHY? See response to checklist question 11.c. A potentially significant impact would occur if the proposed project substantially altered the drainage pattern of an existing stream or river so that flooding would result. There are no streams or rivers located in the project vicinity, and the proposed project would involve only minor changes in the site's drainage patterns and does not involve altering a discernable drainage course. The minor changes to the project site's drainage patterns are not expected to cause flooding. Regardless, the project's potential to cause flooding would be eliminated through the required compliance with the City's SUSMP ordinance. This ordinance requires post-development peak storm water runoff rates to not exceed pre-development peak storm water runoff rates. Compliance with this SUSMP requirement would be ensured through the City's drainage plan review and approval process. Since the proposed project does not involve alteration of a discernable watercourse and post-development runoff discharge rates are required to not exceed pre-development rates, the proposed project does not have the potential to alter drainage patterns or increase runoff that would result in flooding. Therefore, impacts related to flooding would be less than significant, and further discussion in an EIR is not warranted.

e. *Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

☐	☐	☑	☐

WHY? A potentially significant impact would occur if runoff water exceeded the capacity of existing or planned storm drain systems. Since the existing project site is almost entirely impermeable, impermeable surfaces resulting from the development of the proposed project would not significantly change the volume of storm water runoff. However, as discussed above in response to checklist questions 11.c and 11.d, compliance with the City's SUSMP ordinance would ensure that post-development peak storm water runoff rates to not exceed pre-development peak storm water runoff rates. Therefore, the City's existing storm drain system can adequately serve the proposed project. Similarly, the proposed project would generate only typical, non-point source, urban stormwater pollutants. These pollutants are covered by the County-wide MS4 permit, and the proposed project, through the City's SUSMP ordinance, is required to implement BMPs to reduce stormwater pollutants to the maximum extent practicable. Therefore, the proposed project

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

would not create runoff that would exceed the capacity of the storm drain system and would not provide a substantial additional source of polluted runoff. Further discussion in an EIR is not warranted.

f. *Otherwise substantially degrade water quality?*

☐ ☐ ☑ ☐

WHY? See responses to checklist question 11.a and 11.e. A potentially significant impact would occur if the proposed project substantially degraded water quality. The proposed project would not be a point-source generator of water pollutants. The only long-term water pollutants expected to be generated onsite are typical urban stormwater pollutants. Compliance with the City's SUSMP ordinance would ensure these stormwater pollutants would not substantially degrade water quality.

The project, however, also has the potential to generate short-term water pollutants during construction, including sediment, trash, construction materials, and equipment fluids. The County-wide MS4 permit requires construction sites to implement BMPs to reduce the potential for construction-induced water pollutant impacts. These BMPs include methods to prevent contaminated construction site stormwater from entering the drainage system and preventing construction-induced contaminates from entering the drainage system. The MS4 identifies the following minimum requirements for construction sites in Los Angeles County:

1. Sediments generated on the project site shall be retained using adequate Treatment Control or Structural BMPs;
2. Construction-related materials, wastes, spills or residues shall be retained at the project site to avoid discharge to streets, drainage facilities, receiving waters, or adjacent properties by wind or runoff;
3. Non-storm water runoff from equipment and vehicle washing and any other activity shall be contained at the project site; and
4. Erosion from slopes and channels shall be controlled by implementing an effective combination of BMPs (as approved in Regional Board Resolution No. 99-03), such as the limiting of grading scheduled during the wet season; inspecting graded areas during rain events; planting and maintenance of vegetation on slopes; and covering erosion susceptible slopes.

Therefore, with adherence to the required SUSMP ordinance and implementation of required BMPs, the proposed project's impact to water quality would be less than significant. Further discussion in an EIR is not warranted.

g. *Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or dam inundation area as shown in the City of Pasadena adopted Safety Element of the General Plan or other flood or inundation delineation map?*

☐ ☐ ☐ ☑

WHY? A potentially significant impact would occur if the propose project were located within a 100-year floodplain. No portions of the City of Pasadena are within a 100-year floodplain identified by the Federal Emergency Management Agency (FEMA). As shown on FEMA map Community Number 065050, the entire City is in Zone D, for which no floodplain management regulations are required. In addition, according to the City's Dam Failure Inundation Map (Plate 3-1, of the adopted 2002 Safety Element of the City's General Plan) the project is not located in a dam inundation area. The City is also situated over 20 miles from the Pacific Ocean and is not at risk for tsunami. Therefore, the project would not place housing

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

within a 100-year designated flood plain or other area subject to flood hazard. Consequently, the project would have a less than significant impact and no further discussion in an EIR is warranted.

h. *Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?*

☐	☐	☐	☑

WHY? See response to checklist question 11.g. A potentially significant impact would occur if the proposed project would impede or redirect flood flows. No portions of the City of Pasadena are within a 100-year floodplain identified by FEMA. As shown on FEMA map Community Number 065050, the entire City is in Zone D, for which no floodplain management regulations are required. Therefore, the proposed project would not place structures within the flow of the 100-year flood. The project would have no related impacts, and further discussion in an EIR is not warranted.

i. *Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?*

☐	☐	☐	☑

WHY? See response to checklist question 11.g. A potentially significant impact would occur if the proposed project were located within an area susceptible to flooding. No portions of the City of Pasadena are within a 100-year floodplain identified by FEMA. As shown on FEMA map Community Number 065050, the entire City is in Zone D, for which no floodplain management regulations are required. In addition, according to the City's Dam Failure Inundation Map (Plate P-2, of the adopted 2002 Safety Element of the City's General Plan) the project is not located in a dam inundation area. Therefore, the proposed project would not have a significant impact from exposing people or structures to flooding risks, including flooding as a result of the failure of a levee or dam. No impact related to flooding would occur, and further discussion in an EIR is not warranted

j. *Inundation by seiche, tsunami, or mudflow?*

☐	☐	☐	☑

WHY? See response to checklist question 11.g. A potentially significant impact would occur if the proposed project exposed persons or structures to an area susceptible to inundation by seiche, tsunami, or mudflow. The project site is not located near enough to any inland bodies of water or the Pacific Ocean (over 20 miles) to be inundated by either a seiche or tsunami. The project site is located within the Central District Specific Plan area in an urbanized, level, downtown area about two miles east of the San Rafael Hills and about four miles west of the San Gabriel Mountains. Therefore, because the project site is located miles from hillsides that may not even be susceptible to mudflows, the risk of inundation from a mudflow is less than significant. No further evaluation regarding tsunami, seiche or mudflow is warranted in an EIR.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

12. LAND USE AND PLANNING. Would the project:

a. *Physically divide an existing community?*

☐ ☐ ☐ ☑

WHY? A potentially significant impact would occur if the project were sufficiently large, or configured in such a way, so as to create a physical barrier within an established community. Physical division of an established community typically occurs when linear elements such as train tracks or a new highway separates parts of the community. No such elements would occur with this project. The proposed project would not physically divide an existing community, as the project site is surrounded by similar development on all sides, and the project consists of an infill development within a highly urbanized area. No impact would result, and further discussion in an EIR is not warranted

b. *Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

☐ ☐ ☑ ☐

WHY? A significant impact would occur if the project were inconsistent with applicable plans and policies. Various local and regional plans guide development of the project site. The General Plan designation for the project site is Central District Specific Plan. 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 purpose of the Specific Plan is to encourage a diverse mix of land uses designed to create the primary business, financial, retailing and government center of the City.

The three-phased development would renovate the existing structure to provide 114 hotel rooms in an initial phase and add 42 new rooms as an addition to the existing structure in later phases. Phase 1 would also include 2,397 square feet of bar/restaurant space, 357 square feet of retail space and conversion of existing hotel area into five condominium units (16,070 square feet). Two new buildings would be constructed in subsequent phases and include new commercial development. The Phase 2 building would total 40,660 square feet and include the 42 additional hotel rooms, 8,010 square feet of retail space and 1,920 square feet of outdoor restaurant space. A rooftop pool would also be built. The building would be built to six stories (five occupied levels with one roof level) with a maximum height of 65'-9" feet. The third and final phase would total 148,100 feet of gross floor area (143,110 square feet of net leasable area), of which 103,410 square feet would be office space, 30,490 square feet would be restaurant space and 14,200 square feet would be retail space. This building would be built to seven stories (six occupied levels with one roof level) with a maximum height of 90 feet. Total development would be approximately 252,178 gross square feet (including the renovated hotel), resulting in a total Floor Area Ratio (FAR) OF 2.97:1, consistent with allowable FAR of 3:1 for six of the seven site lots, and 2.75:1 for the remaining lot.

In order to comply with the development standards of the Zoning Code, the project requires several entitlements: Conditional Use Permit for a project exceeding 25,000 square feet of floor area; Minor Conditional Use Permit for a Transit-Oriented Development; Minor Conditional Use Permit for shared parking; Minor Conditional Use Permit for Valet Parking; Tree Removal Permits for two protected trees; and a Variance for Loading. In addition, the project will require Concept and Final Design Review by the Design Commission prior to issuance of a building permit. However, the project is consistent with the Central District Specific Plan designated land use intensities and would not conflict with any land use plan, policy or

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

regulation. Therefore, a less than significant impact would occur and further discussion in an EIR is not warranted.

c. *Conflict with any applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP)?*

☐ ☐ ☐ ☑

WHY? A potentially significant impact would occur if the proposed project conflicted with any applicable habitat conservation plans. Currently, there are no adopted Habitat Conservation or Natural Community Conservation Plans within the City of Pasadena. There are also no approved local, regional or state habitat conservation plans in Pasadena. Therefore, no impact associated with Habitat Conservation or Natural Community Conservation Plans would occur and further discussion in an EIR is not warranted.

13. MINERAL RESOURCES. Would the project:

a. *Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

☐ ☐ ☐ ☑

WHY? A potentially significant impact would occur if the proposed project removed the availability of known mineral resources of regional value. The project site is located in a highly urbanized area, and no active mining operations exist in the City of Pasadena. There are two areas in Pasadena that may contain mineral resources. These two areas are Eaton Wash, which, was formerly mined for sand and gravel, and Devils Gate Reservoir, which was formerly mined for cement concrete aggregate. The project is not near these areas. Therefore, the proposed project would have no impact to a known mineral resource and further discussion of this issue in an EIR is not warranted.

b. *Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

☐ ☐ ☐ ☑

WHY? See response to checklist question 13.a. A potentially significant impact would occur if the proposed project removed the availability of known mineral resources of local value. The City's 2004 General Plan Land Use Element does not identify any mineral recovery sites within the City. Furthermore, there are no mineral-resource recovery sites shown in the Hahamongna Watershed Park Master Plan; or the 1999 "Aggregate Resources in the Los Angeles Metropolitan Area" map published by the California Department of Conservation, Division of Mines and Geology. No active mining operations exist in the City of Pasadena and mining is not currently allowed within any of the City's designated land uses. Therefore, the proposed project would not have significant impacts from the loss of a locally-important mineral resource recovery site. Further discussion in an EIR is not warranted.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

14. NOISE. Will the project result in:

a. *Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

☑ ☐ ☐ ☐

WHY? The proposed project would adhere to City regulations governing hours of construction, noise levels generated by construction and mechanical equipment, and the allowed level of ambient noise (Chapter 9.36 of the Pasadena Municipal Code). In accordance with these regulations, construction noise would be limited to normal working hours (7 a.m. to 7 p.m. Monday through Friday, 8 a.m. to 5 p.m. on Saturday, in or within 500 feet of a residential area). A construction related traffic plan is also required to ensure that truck routes for transportation of materials and equipment are established with consideration for sensitive uses in the neighborhood. A traffic and parking plan for the construction phase would be submitted for approval to the Traffic Engineer in the Transportation Department and to the Zoning Administrator prior to the issuance of any permits. Therefore, adhering to established City regulations would ensure that the project would not generate noise levels in excess of standards.

The project could, however expose persons to excessive noise. The 2002 adopted Noise Element of the Comprehensive General Plan contains objectives and policies to help minimize the effects of noise from different sources. According to Figure 2 of the City's Noise Element (2002) the project site lies between the *60* and *65* dBA noise contours. This level of noise is within the *"Clearly Acceptable"* range for the proposed land uses, as shown in Figure 1 of the City's Noise Element (2002). A noise analysis is also required to comply with the California Sound Transmission Standard that interior noise levels attributed to any exterior sources shall not exceed 45 dB in any habitable room. This study would analyze the noise potential and recommended design features, which would limit noise that would impact other uses to the 45 dB level in habitable rooms. Nevertheless, given the scale of the project, impacts would be potentially significant, and this issue will be further explored and addressed in an EIR.

b. *Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?*

☑ ☐ ☐ ☐

WHY? A potentially significant impact would occur if the project caused excessive groundborne vibration or noise levels. High levels of vibration may cause physical personal injury or damage to buildings. However, groundborne vibration levels rarely affect human health. Instead, most people consider groundborne vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of groundborne vibration may damage fragile buildings or interfere with equipment that is highly sensitive to groundborne vibration (e.g., electron microscopes). Groundborne vibrations and groundborne noise generated during construction activities has the potential to cause adverse affects, especially given the proposed renovations to the historic Constance Hotel. Therefore, impacts would be potentially significant, and this issue will be further explored and addressed in an EIR.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
c. *A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*	☑	☐	☐	☐

WHY? See response to checklist question 14.a. A potentially significant impact would occur if the proposed project caused a substantial permanent increase in noise levels above existing ambient levels. Vehicular traffic would be the primary source of permanent noise level increase. A noise technical study would be prepared for inclusion in the EIR to quantify the change in noise levels attributed to the proposed project (from stationary sources and mobile sources such as vehicles) at any sensitive receptor locations. The findings of the noise technical study will determine whether a significant impact would result from the proposed project. This issue will be studied further in an EIR.

d. *A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*	☑	☐	☐	☐

WHY? See response to checklist question 14.a. A potentially significant impact would occur if the proposed project resulted in substantial temporary or periodic increase in ambient noise levels. The proposed project would generate short-term noise due to construction activities. However, the proposed project would adhere to City regulations governing hours of construction and noise levels generated by construction and mechanical equipment (Chapter 9.36 of the Pasadena Municipal Code). In accordance with these regulations, construction noise would be limited to normal working hours (7 a.m. to 7 p.m. Monday through Friday, 8 a.m. to 5 p.m. on Saturday, in or within 500 feet of a residential area). A construction related traffic plan is also required to ensure that truck routes for transportation of materials and equipment are established with consideration for sensitive uses in the neighborhood. A traffic and parking plan for the construction phase would be submitted for approval to the Traffic Engineer in the Transportation Department and to the Zoning Administrator prior to the issuance of any permits. Although impacts would be limited to the working hours and specific periods of activity, and activities would be extensively conditioned prior to issuance of demolition, grading and building permits, impacts would be potentially significant unless mitigation is incorporated, and this issue will be studied further in an EIR.

e. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*	☐	☐	☐	☑

WHY? A potentially significant impact would occur if the proposed project exposed people to excessive noise due to the proximity to an airport or air traffic activity. There are no airports or airport land-use plans in the City of Pasadena. The closest airport is the Bob Hope Airport (formerly the Burbank-Glendale-Pasadena Airport), which is located more than 10 miles from Pasadena in the City of Burbank. Therefore, no impact would occur and further discussion in an EIR is not warranted.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

f. *For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?*

☐ ☐ ☐ ☑

WHY? A potentially significant impact would occur if the project exposed people to excessive noise due to the proximity to an airstrip or air traffic activity. There are no private-use airports or airstrips within or near the City of Pasadena. No impact would occur and further discussion in an EIR is not warranted.

15. POPULATION AND HOUSING. Would the project:

a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

☐ ☐ ☑ ☐

WHY? A potentially significant impact would occur if the proposed project induced substantial population growth that would not have, otherwise, occurred as rapidly or in as great a magnitude. The proposed project involves renovation of the existing former hotel, demolition of existing commercial uses and new development of additional hotel, restaurant, office, retail and limited (five units) residential uses. The proposed project is consistent with the land use designations for the project site (See response to checklist question 12.b). Therefore, the proposed project is consistent with the growth anticipated and accommodated by the City's General Plan. Furthermore, the proposed project is located in a developed urban area within an urban area on one of the City's main commercial streets with in-place infrastructure. Thus, development of the proposed project would not require extending or improving infrastructure in a manner that would facilitate off-site growth. Therefore, the proposed project would not induce substantial population growth, and would have less than significant impacts. Further discussion in an EIR is not warranted.

b. *Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*

☐ ☐ ☐ ☑

WHY? The proposed project would have a significant impact if it displaced a substantial quantity of existing residences. The project site does not contain any existing dwelling units. As discussed in response 15.a, the proposed project involves renovation of the existing former hotel and the demolition of existing commercial uses. Therefore, the proposed project would not displace any residents or housing, and would have no related impacts. Further discussion in an EIR is not warranted.

c. *Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

☐ ☐ ☑ ☐

WHY? The proposed project would have a potentially significant impact if it displaced substantial number of people. No persons currently reside on the project site, and the project site does not contain any existing dwelling units. However, the proposed project involves demolition of existing commercial use. As such,

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

the terms of eviction and relocation assistance would be subject to the specific lease agreements. The existing Bank of America branch would be relocated back into the project after Phase 1. It is also the intention of the project to relocate some of the existing restaurant/retail tenants into the project, if at all possible. Nevertheless, the Applicant would have to comply with any City of Pasadena business relocation assistance laws, unless the lease agreements specifically exempt the Applicant from this responsibility. Therefore, less than significant impacts associated with the displacement of businesses are anticipated. Further discussion in an EIR is not warranted.

16. PUBLIC SERVICES. Will the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. *Fire Protection?*

☐	☐	☑	☐

WHY? The proposed project consists of the renovation of the existing former hotel, demolition of existing commercial uses and new development of additional hotel, restaurant, office, retail and limited (five units) residential uses. The 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan FEIR indicates that buildout of the Central District Specific Plan would not result in the need for new fire facilities; therefore, the demand associated with five new residential condominium units would not result in the need for additional new or altered fire protection services and is not anticipated to alter acceptable service ratios or response times, as fire staffing is assessed annually with the budget process to assure that staffing is commensurate with population increases and consistent with City service levels (2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan FEIR). Furthermore, the applicant is required to pay the City's development fees, which are established to offset incremental increases to fire service demand. In addition, impact fees would be paid by developers of residential units. Therefore, the proposed project would not adversely affect fire protection services, and impacts would be less than significant. Further discussion in an EIR is not warranted.

b. *Libraries?*

☐	☐	☑	☐

WHY? The project site is located less than one mile from Central Library, the nearest branch library. As previously discussed, the proposed project would include five new condominium units. The City has a special tax that is collected to fund library improvements (Section 4.109 of the Municipal Code). The tax is levied on both residential and non-residential properties. The tax is intended to fund improvements as the City grows. The new residents generated by five new condominium units would neither require construction of new library facilities, nor would it reduce the level of service at the Central Library at such a level as to require construction of new facilities. Moreover, the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan FEIR concludes that buildout of the Central District would not result in a significant impact. Therefore because this project is a portion of the development envisioned through 2015, the impact to libraries as a result of the proposed project would likewise be less than significant. Further analysis of this issue in an EIR is not warranted.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
c. *Parks?*	☐	☐	☑	☐

WHY? The City of Pasadena's Memorial Park, Central Park and Grant Park are located approximately one mile from the project site. According to the City's park impact fee nexus study prepared in 2004, for every 1,000 residents the City as a whole has 2.17 acres of developed parkland and 1.49 acres of open space parkland, for a total of 3.66 acres of park and open space per 1,000 residents. The proposed project would include five new condominium units, and these residents would be anticipated to utilize City Parks. In addition, project employees and hotel guests would be anticipated to utilize parks during the daytime hours to walk, exercise or eat lunch. The proposed project would be subject to impact fees to fund park improvements, and the City has prioritized streetscapes and plazas within the Central District Specific Plan area to provide a pedestrian friendly walkable atmosphere to accommodate daytime users such as those this project would generate. The project would also provide approximately 39,000 square feet of open space, including a public courtyard, a pool and recreation area and extensive terraces and balconies. Therefore, the proposed project with incorporation of pedestrian amenities, outdoor usable spaces and street improvements would have a less than significant impact on parks. Further discussion in an EIR is not warranted.

d. *Police Protection?*	☐	☐	☑	☐

WHY? The proposed project consists of the renovation of the existing former hotel, demolition of existing commercial uses and new development of additional hotel, restaurant, office, retail and limited (five units) residential uses. The renovated hotel and commercial uses would require police protection services. However, the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan FEIR indicated that full buildout of the Central District would not have a significant impact on police protection services. Therefore, because the project is consistent with the General Plan and Central District Specific Plan, the proposed project would likewise not result in the need for additional new or altered police protection services and would not alter acceptable service ratios or response times. Similar to Fire Department annual staffing review, police staffing is likewise subject to annual review and budgets are increased to accommodate staffing needs as necessary. Furthermore, the project applicant is required to pay the City's development fees, which are established to offset incremental increases to police service demand. Therefore, the proposed project would not significantly affect police protection services, and impacts would be less than significant. Further discussion in an EIR is not warranted.

e. *Schools?*	☐	☐	☑	☐

WHY? The project site is located in a developed area currently served by the Pasadena Unified School District (PUSD). The proposed project includes the construction five condominium units, which could slightly increase the demand on the services provided by PUSD. However, due to the limited number of new residential units (five units), the increase is negligible and would not warrant the construction of any new facilities or alteration of any existing facilities or cause a decline in the levels of service. In addition, the project applicant will be required to pay school fees as prescribed by state law prior to the issuance of building permits, which are established to offset incremental increases to the local school system. Therefore, the proposed project would not significantly affect schools or result in the need for new or

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

expanded school facilities, and impacts would be less than significant, and further discussion in an EIR is not warranted.

f. *Other public facilities?*

☐ ☐ ☑ ☐

WHY? A significant impact would occur if the project exceeded the capacity or capability of other public facilities to serve the proposed development. The development of the proposed project may result in additional maintenance of public facilities. However with the projected revenue to the City in terms of impact fees, increased property taxes and development fees, this impact would be less than significant. Further analysis in an EIR is not warranted.

17. RECREATION.

a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

☐ ☐ ☑ ☐

WHY? See response to checklist question 16.c. A potentially significant impact would occur if the project caused a substantial physical deterioration of existing neighborhood and regional parks or other recreational facilities. The City of Pasadena's Memorial Park, Central Park and Grant Park are located approximately one mile from the project site. The proposed project consists of the renovation of the existing former hotel, and new development of additional hotel, restaurant, office, retail and limited (five units) residential uses. The residents of the five condominium units in addition to employees and hotels guest would be anticipated to utilize City parks. However, the Central District Specific Plan area is being designed to provide pedestrian amenities such as benches, streetscapes and plazas and paseos that would provide an environment that is conducive to walking. In addition, any new residential development would be subject to recreation impact fees to fund recreational improvements (2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan FEIR). The project would also provide approximately 39,000 square feet of open space, including a public courtyard, a pool and recreation area and extensive terraces and balconies. Therefore, the proposed project would have a less than significant impact on parks. Further discussion in an EIR is not warranted.

b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?*

☐ ☐ ☑ ☐

WHY? See responses to checklist question 16.c and 17.a. A potentially significant impact would occur if the project necessitated construction activities, which would adversely impact the environment, for the expansion or development of parks or other recreational facilities. The proposed project consists of the renovation of the existing former hotel and new development of additional hotel, restaurant, office, retail and limited (five units) residential uses. A rooftop pool would also be built. Although the proposed project does not specifically include recreational facilities, the proposed project would not require the construction or expansion of off-site recreational facilities, and the proposed project would be subject to recreation impact fees to fund recreational improvements. The project would also provide approximately 39,000 square feet of open space, including a public courtyard, a pool and recreation area and extensive terraces and balconies.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

Therefore, the impact of the proposed project relative to the construction of offsite recreational facilities is less than significant, and further analysis in an EIR is not warranted.

18. TRANSPORTATION/TRAFFIC. Would the project:

a. *Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?*

☑ ☐ ☐ ☐

WHY? A potentially significant impact would occur if the project increased traffic above the existing traffic load of the street system. The proposed project has the potential to increase traffic in the project vicinity and area roadways. A detailed traffic analysis will be conducted and included in the EIR to fully evaluate the impact of the proposed project on intersections, street segments and freeway segments in the project area. These impacts are identified as potentially significant and will be further evaluated in an EIR.

b. *Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?*

☑ ☐ ☐ ☐

WHY? A potentially significant impact would occur if the project individually or cumulatively exceeded the service standards of the Metropolitan Transportation Authority's (MTA) Congestion Management Plan (CMP). The CMP is a State-mandated program designed to address the impact urban congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement project (STIP). The CMP guidelines specify that all freeway segments where a project could add 150 or more trips in each direction during the peak hours be evaluated. The guidelines also require evaluation of all designated CMP roadway intersections where a project could add 50 or more trips during either peak hour. The Los Angeles County Metropolitan Transportation Authority (MTA) adopted their most recent Congestion Management Program (CMP) in 2004. The EIR will include a comprehensive traffic study that will assess whether the proposed project would individually or cumulatively exceed an established level of service standard, and that impact the proposed project could have on CMP intersections.

c. *Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*

☐ ☐ ☐ ☑

WHY? A potentially significant impact would occur if the project caused a change in air traffic patterns that would result in a substantial safety risk. The project site is not within an airport land use plan or within two miles of a public airport or public use airport. Consequently, the proposed project would not affect any airport facilities and would not cause a change in the directional patterns of aircraft. Therefore, the proposed project would have no impact to air traffic patterns. Further discussion of this issue in an EIR is not warranted.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

d. *Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

☐ ☐ ☑ ☐

WHY? A potentially significant impact would occur if the project substantially increased an existing hazardous design feature or introduced incompatible uses to the existing traffic pattern. The proposed project would not create any safety hazards from project design features and would not introduce incompatible uses. All ingress and egress to the project site would be provided in compliance with the specifications of the Departments of Public Works and Transportation to ensure that adequate visibility and safety distance are provided at these assess points. Consequently, the proposed project would have a less than significant impact, and further discussion of this issue in an EIR is not warranted.

e. *Result in inadequate emergency access?*

☐ ☐ ☑ ☐

WHY? A potentially significant impact would occur if the project resulted in inadequate emergency access. Site evacuation plans and procedures, emergency access ingress and egress points, and fire lanes would be provided to the satisfaction of the Pasadena Fire and Police Departments. Ingress and egress would also comply with all Building, Fire and Safety Codes with final plans subject to review and approval by the Public Works and Transportation Departments, the Building Division and the Fire Department. No permanent lane closures or obstructions that could impeded emergency response to or from the project site from surrounding streets would occur with the proposed project. Consequently, the proposed project would have a less than significant impact, and further discussion of this issue in an EIR is not warranted.

f. *Result in inadequate parking capacity?*

☑ ☐ ☐ ☐

WHY? A potentially significant impact may occur if the proposed project would result in an inadequate parking capacity based on the City's Zoning Code. The proposed project would provide a total of 784 subterranean parking spaces upon completion. Additionally, parking during Phase 1 of the project, will be provided off-site (148 spaces) in the project area through the review and approval of a Minor Conditional Use Permit for shared parking. Parking will be provided on-site for completion of Phases 2 and 3. A detailed parking analysis will be conducted and included in the EIR to fully evaluate the impact of the proposed project (including the proposed off-site shared parking for Phase 1) and to determine whether available parking is sufficient to meet projected demand. These impacts are identified as potentially significant and will be further evaluated in an EIR.

g. *Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks)?*

☑ ☐ ☐ ☐

WHY? A potentially significant impact would occur if the project conflicted with programs supporting alternative transportation. The project site is located within the Central District, a highly urbanized part of Pasadena. The Traffic study for the EIR will assess the impact of the proposed project on the City's Mobility Element policies concerning trip reduction and alternate modes of transportation, as well as other relevant

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

regional plans and policies. Trip reducing aspects of the proposed project and their associated benefits will be identified in the EIR or imposed upon the proposed project as may be required to mitigate any potential traffic and transportation related impacts. This issue will be further evaluated in an EIR

19. UTILITIES AND SERVICE SYSTEMS. Would the project:

a. *Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*

☐	☐	☑	☐

WHY? A potentially significant impact would occur if the proposed project exceeded wastewater treatment requirements of the Regional Water Quality Control Board (RWQCB). The proposed project would generate wastewater in the form of domestic sewage. Domestic sewage typically meets wastewater treatment requirements because wastewater treatment facilities are designed to treat domestic sewage. The proposed project does not involve the release of unique or unusual sewage into the wastewater treatment system, and as such, would not generate unusual volumes or materials in excess of RWQCB requirements. Los Angeles County treats the City's wastewater, and individual projects are subject to a Los Angeles County fee when the project is hooked up to a sewer line.

The City of Pasadena is within Los Angeles County Sanitation District 16. All sewage would be conveyed to existing City sewer lines and facilities and would be regulated by applicable standards and requirements as imposed and enforced by the Department of Public Works, Engineering Division. All wastewater would be treated in compliance with the requirements of the RWQCB, and the project would have less than significant impacts. Further discussion in an EIR is not warranted.

b. *Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

☑	☐	☐	☐

WHY? A potentially significant impact would occur if the proposed project resulted in the construction or expansion of facilities that would cause significant physical impacts. The City's sewer system has adequate capacity to accommodate current demands, and the majority of the system has adequate surplus capacity to accommodate anticipated buildout (City of Pasadena General Plan EIR, 2004). The capacity of the sewer system to accept flow from new developments is currently being addressed on a case-by-case basis by requiring each development to prepare a comprehensive analysis of the impact of the development on the affected segments of the City's sewer system. This analysis typically includes flow monitoring to accurately determine the current load on the sewer system.

The proposed project consists of the renovation of the existing former hotel and new development of additional hotel, restaurant, office, retail and limited (five units) residential uses. Based on a conservative factor of 90% of water used becoming wastewater (City of Pasadena General Plan EIR, 2004), the proposed project would generate approximately 41,603 gpd of wastewater, which is approximately 28,571 gpd more than the current use.

In December of 2007, the City of Pasadena adopted a finding that a projected water shortage existed within the City, and adopted Water Shortage Plan I pursuant to Pasadena Municipal Code 13.10.040. Unless the finding and Plan are withdrawn prior to construction, the project must comply with the Water Shortage Procedures Ordinance (Chapter 13 of the Pasadena Municipal Code). To ensure compliance, the applicant shall submit a water conservation plan limiting the project's water consumption to 90% of its originally

anticipated consumption. This plan shall be submitted to and approved by the City's Water and Power Department and the Building Division prior to the issuance of a building permit. The applicant's irrigation and plumbing plans shall comply with the approved water conservation plan. The project has also committed to LEED certification and will meet the City's green building requirements, and at a minimum, will be required to meet Water Efficiency pre-requisites under the applicable rating system.

As discussed in the City's 2004 General Plan FEIR, new development built pursuant to the 2004 Land Use Element, as implemented by the Zoning Code Revisions, will increase wastewater generation. Approximately 90% of water consumed within the City becomes wastewater. Using this factor, Pasadena is expected to generate approximately 24.2 million gallons per day (mgd) of wastewater in 2015, an increase of 4.28 million gpd (18%) over 2000 conditions. The City's wastewater is treated at the Whittier Narrows, Los Coyotes the San Jose Creek Water Reclamation Plants. These plants provide primary, secondary and tertiary treatment. No existing deficiencies have been identified in the County Sanitation Districts' collection or treatment facilities serving Pasadena. County Sanitation Districts indicated the Whittier Narrows Water Reclamation Plant has a design capacity of the plant is 15 mgd and that the plant currently processes an average flow of 8.5 mgd. The District also indicated the Los Coyotes WRP has a design capacity of 37.5 mgd and processes an average flow of 22.6 mgd. The design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by SCAG. All expansions of the Districts' facilities must be sized and serviced in a manner that is consistent with SCAG regional growth forecasts.

Impacts to wastewater treatment facilities are considered potentially significant and this issue will be further discussed in an EIR.

c. *Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

☐	☐	☑	☐

WHY? A potentially significant impact would occur if the proposed project increased surface water runoff, resulting in the need for expanded off-site stormwater drainage facilities. The proposed project would not require the construction of new storm water drainage facilities or the expansion of existing facilities. The project site is located in a developed urban area where storm drainage is provided by existing streets, storm drains, flood control channels, and catch basins. It is fully improved and developed with commercial and parking uses. As discussed in response to checklist question 11.c, the proposed project would involve only minor changes in the project site's drainage patterns and would not involve altering any drainage courses or flood control channels. Further, the project applicant must submit and implement an on-site drainage plan that meets the approval of the Building Official and the Public Works Department. The City's SUSMP ordinance requires that post development peak storm water runoff rates not exceed pre-development peak storm water runoff rates. Therefore, the proposed project would not require or result in any stormwater drainage improvements and the impacts would be less than significant. Further analysis in an EIR is not warranted.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
d. *Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*	☑	☐	☐	☐

WHY? A potentially significant impact would occur if the existing entitlements were not available to serve the proposed project. The adequacy of water supply is a potential problem for all new development since the Southern California region has been known to experience periods of drought and needs a long-term reliable water supply. The proposed project's daily water demand is estimated to be 49,924 gpd. The existing buildings on the project site have an estimated daily water demand of 15,638 gpd. Therefore, the net increase in water consumption would be approximately 34,285 gpd. During periods of drought, the proposed project would be required to comply with the City's Water Shortage Procedures Ordinance, which reduces monthly water consumption to 90% of the expected consumption for this type of land use. In addition, the City anticipates statewide water demand reduction requirements beginning in 2009, as a result of Governor Arnold Schwarzenneger's 2008 20% reduction by 2020 ("20x2020"), and the current work being done by the California Department of Water Resources, the State Water Resources Control Board, and other state agencies to implement the Governor's 20x2020 Water Conservation Initiative Program. As a result, to meet these policy goals, the current project must comply with the Water Shortage Procedures Ordinance and the City's goal to meet the 20x2020 goals by submitting a water-conservation plan limiting the water consumption to 80% of its originally anticipated amount. With submission of this plan, the project will not have any individual or cumulative impacts on water supply. This plan is subject to review and approval by the City's Water and Power Department and the Building Division before the issuance of a building permit. The applicant's irrigation and plumbing plans are also required to comply with the approved water-conservation plan.

According to the 2004 General Plan EIR, development pursuant to the 2004 Land Use Element, and implemented through the Zoning Code Revisions, the proposed project would neither deplete water supplies nor exceed expected projections. However, conservation is a part of ensuring future supplies are adequate to serve the existing and projected population increases. Therefore, the impact is significant unless mitigation is incorporated, and this issue will be further discussed in the EIR.

e. *Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ( )*	☑	☐	☐	☐

WHY? A potentially significant impact would occur if the proposed project would increase wastewater generation to the degree that the capacity of facilities currently serving the project site would be exceeded. As discussed in response to checklist question 19.b, the proposed project would generate approximately 41,603 gpd of wastewater, which is approximately 28,571 gpd more than the current use. As discussed in response to checklist question 19.b, impacts to wastewater treatment facilities are considered potentially significant and this issue will be further discussed in an EIR.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
f. *Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? ( )*	☐	☐	☑	☐

WHY? A potentially significant impact would occur if the proposed project's solid waste generation exceeded the capacity of permitted landfills. The proposed project can be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. The project site is located in a developed urban area within the City's refuse collection area. The City of Pasadena is served primarily by Scholl Canyon landfill, which is permitted through 2017, and secondarily by Puente Hills, which was re-permitted in 2003 for 10 years. The Scholl Canyon landfill has a permitted daily capacity of 3,400 tons and an average daily throughput of 1,400 tons (Los Angeles County Sanitation Districts, 2007). Therefore, the Scholl Canyon landfill has a surplus capacity of approximately 2,000 tons per day. The proposed project would generate an estimated 0.91 tons of solid waste per day, which would account for less than 0.1% of the Scholl Canyon landfill's average daily surplus capacity.

The proposed project will be subject to Chapter 8.62 of the Municipal Code, which is the construction demolition and waste management ordinance. Pursuant to this ordinance, the proposed project will be required to divert a minimum of 50% of the construction and demolition debris from the project. Additionally, the proposed project will be LEED certified, and required to comply with LEED Materials and Resources Prerequisites (including Storage and Collection of Recyclables). Therefore, the proposed project's impact to landfill capacity would be less than significant and further discussion in an EIR is not warranted.

g. *Comply with federal, state, and local statutes and regulations related to solid waste? ( )*	☐	☐	☑	☐

WHY? A potentially significant impact would occur if the proposed project were in non-compliance with any federal, State, or local statutes related to solid waste. Solid waste management is guided by the California Integrated Waste Management Act of 1989 (AB 939) that emphasizes resource conservation through reduction, recycling, and reuse of solid waste. The Act requires that localities conduct a Solid Waste Generation Study (SWGS) and develop a Source Reduction Recycling Element (SRRE). The City of Pasadena adopted the "Source Reduction and Recycling Element" to comply with the California Integrated Waste Management Act in 1992, which requires that jurisdictions maintain a 50% or better diversion rate for solid waste. The City implements this requirement through Section 8.61 of the Pasadena Municipal Code, which establishes the City's "Solid Waste Collection Franchise System". As described in Section 8.61.175, each franchisee is responsible for meeting the minimum recycling diversion rate of 50% on both a monthly basis and annual basis. The proposed project is required to comply with the applicable solid waste franchise's recycling system, and thus, will meet Pasadena's and California's solid waste diversion regulations. In addition, the proposed project is required to comply with the City's Construction and Demolition Ordinance (Chapter 8.62 of the Pasadena Municipal Code), because the project meets the threshold of "new structures of 1,000 or more gross square feet." Therefore, impacts related to solid waste regulations would be less than significant, and further discussion in an EIR is not warranted.

20. EARLIER ANALYSIS.

Earlier analysis is not being used for this project, with the exception of referenced documents.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

21. MANDATORY FINDINGS OF SIGNIFICANCE.

a. *Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

☑ ☐ ☐ ☐

WHY? The project site is located within a highly urbanized area lacking any biological resources, as discussed in response to checklist question 6, Biological Resources. Therefore, no impacts to biological resources are anticipated. In addition, the proposed project would not cause significant impacts to archaeological or paleontological resources. No further discussion of biological, archaeological or paleontological resources is warranted in the EIR. However, the EIR will include standard mitigation measures related to archaeological or paleontological resources to reduce any potential impacts to less than significant.

The proposed project will renovate an existing historical resource, as well as provide new adjacent development that will be integrated with the resource. The renovation and addition to the hotel would potentially result in a significant impact on an historic resource. Therefore, an Architectural/Historical Resources Evaluation will be prepared, and the results of the evaluation will be reviewed by the Historic Preservation Commission. Impacts to historic resources would be potentially significant, and this issue will be analyzed further in an EIR.

b. *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future project?*

☑ ☐ ☐ ☐

WHY? A significant impact may occur if the project, in conjunction with the related projects, would result in impacts that are less than significant when viewed separately but would be significant when viewed together. Cumulative impacts may occur in the issue areas where potentially significant impacts are identified in this Initial Study. The initial study has identified potentially significant effects with respect to Aesthetics, Air Quality, Cultural Resources (Historic Resources only), Noise, Transportation/Traffic, and Utilities and Service Systems (Water and Wastewater only). Therefore, for these issue areas pending further study, cumulative impacts are potentially significant and will be further discussed and evaluated in the EIR.

c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

☑ ☐ ☐ ☐

WHY? Buildout of the proposed project has the potential to create environmental effects that could significantly affect human health or safety (refer to Aesthetics, Air Quality, Cultural Resources (Historic Resources only), Noise, Transportation/Traffic, and Utilities and Service Systems (Water and Wastewater

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact

only)). The potential impacts of the proposed project with respect to adverse effects to human beings will be studied further in an EIR.

INITIAL STUDY REFERENCE DOCUMENTS

#	DOCUMENT
1.	Alquist-Priolo Earthquake Fault Zoning Act, California Public Resources Code, revised January 1, 1994 official Mt. Wilson, Los Angeles and Pasadena quadrant maps were released March 25, 1999.
2.	CEQA Air Quality Handbook, South Coast Air Quality Management District, revised 1993
3.	East Pasadena Specific Plan Overlay District, City of Pasadena Planning and Development Department, codified 2001
4.	Energy Element of the General Plan, City of Pasadena, adopted 1983
5.	Fair Oaks/Orange Grove Specific Plan Overlay District, City of Pasadena Planning and Development Department codified 2002
6.	Final Environmental Impact Report (FEIR) Land Use and Mobility Elements of the General Plan, Zoning Code Revisions, and Central District Specific Plan, City of Pasadena, certified 2004
7.	2000-2005 Housing Element of the General Plan, City of Pasadena, adopted 2002
8.	Inclusionary Housing Ordinance Pasadena Municipal Code Chapter 17.71 Ordinance #6868
9.	Land Use Element of the General Plan, City of Pasadena, adopted 2004
10.	Mobility Element of the General Plan, City of Pasadena, adopted 2004
11.	Noise Element of the General Plan, City of Pasadena, adopted 2002
12.	Noise Protection Ordinance Pasadena Municipal Code Chapter 9.36 Ordinances # 5118, 6132, 6227, 6594 and 6854
13.	North Lake Specific Plan Overlay District, City of Pasadena Planning and Development Department, Codified 1997
14.	Pasadena Municipal Code, as amended
15.	Phase I Environmental Site Assessment, Pasadena Manor 908-940 E. Colorado Boulevard. Pasadena, California 91106, IVI Due Diligence Services, Inc., June 22, 2006
16.	Preliminary Geotechnical Research, Proposed Rehabilitation of Existing Hotel and New Office Building, 940 East Colorado Boulevard, Pasadena, California, Geo technologies, Inc., January 21, 2008
17.	Recommendations On Siting New Sensitive Land Uses, California Air Resources Board, May 2005
18.	Regional Comprehensive Plan and Guide, “Growth Management Chapter,” Southern California Association of Governments, June 1994
19.	Safety Element of the General Plan, City of Pasadena, adopted 2002
20.	Scenic Highways Element of the General Plan, City of Pasadena, adopted 1975

21. Seismic Hazard Maps, California Department of Conservation, official Mt. Wilson, Los Angeles and Pasadena quadrant maps were released March 25, 1999. The preliminary map for Condor Peak was released in 2002.

22. South Fair Oaks Specific Plan Overlay District Planning and Development, codified 1998

23. State of California “Aggregate Resource in the Los Angeles Metropolitan Area” by David J. Beeby, Russell V. Miller, Robert L. Hill, and Robert E. Grunwald, Miscellaneous map no. .010, copyright 1999, California Department of Conservation, Division of Mines and Geology

24. Storm Water and Urban Runoff Control Regulations Pasadena Municipal Code Chapter 8.70 Ordinance #6837

25. Transportation Impact Review Current Practice and Guidelines, City of Pasadena, August, 2005

26. Tree Inventory at 880 East Colorado Boulevard, Pasadena, California, March 1, 2009

27. Tree Protection Ordinance Pasadena Municipal Code Chapter 8.52 Ordinance # 6896

28. West Gateway Specific Plan Overlay District, City of Pasadena Planning and Development Department codified 2001

29. Zoning Code, Chapter 17 of the Pasadena Municipal Code