V. OTHER ENVIRONMENTAL CONSIDERATIONS

A. SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(b) requires that any significant impacts, including those that can be mitigated but not reduced to a less than significant level, be described and their implications discussed in an EIR. Impacts of the project are analyzed throughout Section IV, Environmental Impact Analysis, of this EIR. As discussed therein, project-level significant unavoidable impact that would occur are related to air quality, historical resources, and transportation and circulation (specifically, street segments).

AIR QUALITY

The proposed project would result in significant unavoidable impacts during all three phases of construction. Specifically, Phase 1~~, 3~~ and ~~3~~2 emissions would result in a less-than-significant regional VOC impact, but Phase 3 emissions would result in a significant and unavoidable regional impact. Additionally, significant and unavoidable localized $PM_{2.5}$ and PM_{10} impacts would occur during each of the three project phases. These impacts would be intermittent and short-term in nature during the construction process depending on equipment use and construction phase. Additionally, while SCAQMD-required mitigation measures would reduce air quality impacts, construction emissions would contribute to a significant short-term cumulative impact. No significant unavoidable impacts would occur during the operational phase of the proposed project.

Greenhouse gas (GHG) emissions were calculated for on-road mobile vehicle operations, general electricity consumption, electricity consumption associated with the use and transport of water, natural gas consumption, and solid waste decomposition. Estimated GHG emissions would be less than the 10,000 metric tons of CO2e per year quantitative significance threshold.

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

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

HISTORICAL RESOURCES

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

TRANSPORTATION AND CIRCULATION

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

The CEQA Guidelines (Section 15126.2(b)) also require that, where there are significant impacts that cannot be alleviated without imposing an alternative design, the reasons why the project is being proposed, notwithstanding such impacts, be discussed in the EIR. The basic objectives of the proposed project, which are listed in Section II, Project Description, of this EIR, outline the primary reasons for the project. These objectives provide the basis for the project and illustrate why the project is being proposed in spite of the above-mentioned specific unavoidable impacts. Specifically, the primary objectives for the project are to renovate and preserve the existing historic landmark to Secretary of the Interior standards by returning the Constance Hotel to its original use, and develop an underutilized site that will attract and retain businesses while promoting local job growth east of Lake Avenue.

B. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(c) requires that an EIR analyze significant irreversible environmental changes that would be caused by the proposed project. This includes the use of nonrenewable resources during construction and operation of a project to such a degree that the use of the resources thereafter is unlikely. It also includes significant and irreversible environmental changes that could result from environmental accidents associated with the project.

Construction of the proposed project would result in a commitment of limited, slowly renewable, and nonrenewable resources. Such resources would include certain types of lumber and other forest products; metals such as steel, copper, and lead; aggregate materials used in concrete and asphalt (e.g., stone, gravel, and sand); and other construction materials such as plastic. In addition, fossil fuels used in construction vehicles would also be consumed during construction of the project.

Operation of the proposed project would involve the continued consumption of limited, non-renewable, and slowly renewable resources similar to other projects. These resources would include natural gas and electricity, petroleum-based fuels, fossil fuels, and water. Energy resources would be used for heating and cooling of buildings, transporting people and goods to and from the site, heating and refrigeration for food storage and preparation, heating and cooling of water, and lighting. Operation of the project would occur in accordance with Title 24, Part 6 of the California Code of Regulation, which sets forth conservation practices that would limit the amount of energy consumed by the project, and the project would meet City of Pasadena's Green Building Program requirements to comply with Leadership in Energy and Environmental Design (LEED) standards under the US Green Building Council (USGBC). Nonetheless, the use of such resources would still continue to represent a long-term, irreversible commitment of these resources.

In addition, the limited use of common hazardous materials on the project site, including cleaning agents and pesticides for landscaping, would be used, handles, stored, and disposed of in accordance with applicable regulations and standards. Thus, the project would not result in a significant and irreversible environmental change associated with the accidental release of hazardous materials.

C. GROWTH-INDUCING IMPACTS

CEQA Guidelines Section 15126.2(d) requires that an EIR discuss growth-inducing impacts of a proposed project. Growth-inducing impacts are ways in which the project could "…foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." This includes projects that would remove obstacles to growth. However, as stated in the Guidelines, "it must not be assumed that growth in any areas is necessarily beneficial, detrimental, or of little significance to the environment."

The proposed project involves the renovation of the 65,750 square foot existing former hotel (originally constructed as the Constance Hotel in 1926 and formerly occupied as the Pasadena Manor retirement home), including 3,700 square feet of basement, demolition of existing commercial uses and new development of additional hotel rooms, restaurant, office, retail and limited (five units) residential uses. The three-phased development would renovate the existing structure to provide 136 hotel rooms in the initial phase and add 20 new hotel rooms and 5 residential units as an addition to the existing structure. The project includes an office component (103,410 square feet) and retail/commercial and restaurant space (60,271 square feet).

As the proposed project would include a residential component, the project would directly result in a permanent, (but small) full-time population growth in the area. The proposed project, however, would not significantly impact existing schools or other community services in the area. In addition, while the project would increase the daytime population in the area due to the addition of hotel guests, residents and employees, the project is not expected to induce people to move to the area. Thus, the project would not induce population growth, and while it could foster a small degree of economic growth due to the increase in employees, and visitors to the area, such growth-inducement would not be significant.

Furthermore, the project would not induce growth in an area that is not already developed with infrastructure to accommodate such growth. 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.

Additionally, it would be located in close proximity to various public transportation opportunities. The project would incorporate new improvements, including some minor localized street improvements to accommodate access to the site, as well as water sewer connection improvements. These infrastructure improvements would serve the proposed uses and any excess capacity that may be provided by such improvements would not be to such a degree so as to induce or introduce additional growth in the area.

Overall, the project would not result in an increase in the population that may tax existing community service facilities, or encourage or facilitate other activities that could significantly affect the environment or the area, either individually or cumulative. Thus, the project would not result in significant growth-inducing impacts.

D. POTENTIAL SECONDARY EFFECTS

CEQA Guidelines Section 15126.4(a)(1)(D) states that, "If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measures shall be discussed but in less detail than the significant effects of the project as proposed." In accordance with the Guidelines, the following provides a discussion of the potential impacts that could occur from implementation of the proposed mitigation measures.

AESTHETICS

Mitigation Measure IV.A-1 requires all lighting along the perimeter of the site, particularly street lamps, be focused on the project site and oriented in a manner that will prevent spillage or glare into surrounding uses.. Mitigation Measure IV.A-2 requires the proposed project comply with the City's lighting regulations included in the Zoning Code, which limit the reflectivity of architectural materials used to reduce any adverse impacts from window glass glare. Mitigation Measure IV.A-3 requires construction equipment staging areas use appropriate screening (i.e., temporary fencing with opaque material) to buffer views of construction equipment and material to the adjacent land uses. These design elements would not result in secondary impacts.

AIR QUALITY

Implementation of Mitigation Measures IV.B-1 through IV.B-7 would ensure that fugitive dust emissions would be reduced by approximately 61 percent. Mitigation Measure IV.B-8 would reduce project-related architectural coating emissions by 96 percent. Architectural coating emissions would be reduced to 12 pounds per day, which would be less than the 75 pounds per day significance threshold. Mitigation Measures IV.B-9 and IV.B-10 would also reduce VOC emissions. Mitigation Measures IV.B-11 and IV.B-12 would reduce localized particulate matter emissions from fuel combustion. However, particulate matter emissions would remain above the significance thresholds. Mitigated emissions would result in a less-than-significant regional VOC impact but significant and unavoidable localized $PM_{2.5}$ and PM_{10} impacts. No physical changes would result from these measures, and no secondary impacts would occur as a result of these mitigation measures.

HISTORICAL RESOURCES

Implementation of the mitigation measures contained in Section IV.C, Cultural Resources, of this EIR would not reduce impacts to historic resources (specifically, the Constance Hotel and the related Colorado Boulevard storefronts) to a less-than-significant level. Consequently, the project as currently proposed, would have a significant and unmitigated impact to historical resources, even with preservation of the former Constance hotel tower and related elements including the hotel courtyard. Nonetheless, no significant secondary impacts are anticipated from these documentation, survey, construction practice and monitoring measures.

NOISE AND GROUND-BORNE VIBRATION

Mitigation Measures IV.D-1 and IV.D-2 would assist in controlling construction noise. Mitigation Measure IV.D-3 would eliminate pile driving activity in favor of caisson drilling. Caisson drilling generates a noise level of 71 dBA at 100 feet, which would be less than the 85 dBA significance threshold. Caisson drilling would generate a vibration level of 1.0 inches per second at the former Hotel Constance and the buildings located adjacent and to the south of the project site

instead of the 7.2 inches per second pile driving vibration level. Mitigation Measures IV.D-4 through IV.D-6 would ensure that vibration-induced building damage is recorded and repaired. No physical changes would result from these notification, survey and monitoring measures, and no secondary impacts would occur as a result of these mitigation measures.

TRANSPORTATION AND CIRCULATION

Mitigation Measure IV.E-1 requires that the proposed project contribute funds to the Neighborhood Traffic Management Capital Improvement Program Fund Number 75210. The funds will be used to implement traffic management measures to protect neighborhoods potentially influenced by the project's traffic. Mitigation Measure IV.E-2 requires that all of the sidewalks, crosswalks and travel lanes along Mentor Avenue and Colorado Boulevard be made available such that pedestrian and vehicular access and circulation within and in the vicinity of the project site would be maintained at all times during construction activities. Mitigation Measure IV.E-3 requires the functional adequacy of the valet operations on-site be demonstrated to the Pasadena Department of Transportation at the time of final design and permits for the Phase 1 component of the proposed project to ensure there will be no conflicts with on-site services. Mitigation Measure IV.E-4 requires a formal recorded parking agreement between the applicant and the off-site parking provider be submitted to the City's Planning Department and Department of Transportation prior to the issuance of the first permit for construction (foundation, demolition, grading, or building). These procedural measures would not result in significant secondary impacts.

Mitigation Measures IV.E-5 though IV.E-8 are construction-specific measures, and no significant secondary impacts would occur. Similarly, Mitigation Measures IV.E-9 though IV.E-10 pertain to site access and circulation, and no significant secondary impacts would occur.

Mitigation Measure IV.E-11 pertains to the Lake Avenue/Walnut Street intersection and requires the proposed project compensate for the acquisition of a shuttle bus as well as for the operations and maintenance (O&M) costs for the new shuttle bus service to be operated along Lake Avenue and/or the Walnut Street travel corridors at minimum for the first three years. Nominal air quality and noise effects would result from additional shuttle trips, none of which would be sufficient to create a new significant impact. Mitigation Measures IV.E-12 and IV.E-13 pertain to Transit Incentives and require the proposed project provide subsidized transit passes at specific locations, conveniently located on-site and for a bus zone at the southeast corner of the Lake Avenue/Colorado Boulevard intersection. No secondary impacts would occur as a result of these mitigation measures.

Mitigation Measure IV.E-14 requires the driveway designs, valet service area and operations and loading area functionality be coordinated with the City of Pasadena DOT at the time of final design. Likewise, Mitigation Measure IV.E-15 requires that truck and vehicular turn templates be laid out on the site plan once design details have been worked out to ensure that on-site congestion is minimized to the satisfaction of Pasadena DOT at the time of final design approval. No secondary impacts would occur as a result of these procedural mitigation measures.

UTILITIES

Wastewater and Service Systems

Mitigation Measures IV.F.1-1 through IV.F.1-3 would ensure that sufficient improvements are provided with adequate capacity to serve the proposed project to the satisfaction of the City of Pasadena Department of Public Works. Improvements could require minor trenching and grading with associated short-term air quality and noise effects, none of which would be sufficient to create a new significant impact, or to compound a previously analyzed impact such that a less than significant impact would exceed established thresholds of significance. No significant secondary impacts would occur as a result of these mitigation measures.

Water Supply Systems

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

E. EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines requires that an EIR contain a brief statement indicating the reasons that certain possible significant effects of a project were determined to be less than significant and thus, were not analyzed in the EIR. Discussions of those impacts found not to be significant are provided here:

AGRICULTURAL RESOURCES

The City of Pasadena 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. Implementation of the proposed project would not result in the conversion of farmland, and no loss of farmland would result from the proposed project. Furthermore, no Williamson Act contracts are applicable on the site.

BIOLOGICAL RESOURCES

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. 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.

There are no sensitive natural plant communities, such as wetlands, oak woodland, and habitat conservation planning areas are found on the site. There are five public street trees adjacent to the site, and they are proposed for retention with the project. There are 31 trees on the project site. Two of the trees appear to meet the size criteria for protection under the City's Tree Protection Ordinance based on the tree inventory submitted with the application in March 2009. The protected trees proposed for removal include a 20"DBH Indian laurel fig and a 19.4"DBH Rosy-red ironbark. The City's Tree Protection Ordinance allows for the removal of protected trees if at least one of six specific findings is made by the decision making body in the final review of the land use entitlements for the project. The specific findings for private tree removals of protected trees are identified in PMC Chapter 8.52.075A. One of the findings allows for the replacement of the removed protected trees with new trees elsewhere on the project site, which is proposed in the new project. 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.

CULTURAL RESOURCES

Archaeological Resources

There are no known prehistoric or historic archeological sites on the project site, and the project site does not contain undisturbed surficial soils. 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.

Paleontological Resources

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.

ENERGY

The proposed project will meet City of Pasadena's Green Building Program requirements to comply with Leadership in Energy and Environmental Design (LEED) standards under the US Green Building Council (USGBC). Refinement of specific features will be developed as the project moves further along in the design and entitlements processes and a specific LEED path is determined. However, in any instance, the project will comply with pre-requisites in the five primary categories of Sustainable Sites, Water Efficiency, Energy and Atmosphere, Materials and Resources, and Indoor Environmental Quality. Additionally, the EIR is required to assess the project's energy impacts on greenhouse gases as part of its air quality analysis (see chapter IV.B, Air Quality).

GEOLOGY AND SOILS

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.[1] In addition, the project site is not within a Liquefaction Hazard Zone or Landslide Hazard Zone. The project site is level and urbanized and is not located in the vicinity of any slopes.

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.

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. Likewise, 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. 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.

HAZARDS AND 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

[1] Preliminary Geotechnical Research, Proposed Rehabilitation of Existing Hotel and New Office Building, 940 East Colorado Boulevard, Pasadena, California, Geotechnologies, Inc., January 21, 2008.

significant level through compliance with these standards and regulations, and would not pose significant hazards to the public or the environment.

The Phase I Environmental Site Assessment prepared of the project site reviewed readily available environmental databases maintained by federal, state and local agencies.[2] 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 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.

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.

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.

HYDROLOGY AND WATER QUALITY

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.

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.

[2] Phase I Environmental Site Assessment, Pasadena Manor 908-940 E. Colorado Boulevard. Pasadena, California 91106, IVI Due Diligence Services, Inc., June 22, 2006.

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.

LAND USE AND PLANNING

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 proposed project involves the renovation of the 65,750 square foot existing former hotel (originally constructed as the Constance Hotel in 1926 and formerly occupied as the Pasadena Manor retirement home), including 3,700 square feet of basement, demolition of existing commercial uses and new development of additional hotel rooms, restaurant, office, retail and limited (five units) residential uses. The three-phased development would renovate the existing structure to provide 136 hotel rooms in the initial phase and add 20 new hotel rooms and 5 residential units as an addition to the existing structure. The project includes an office component (103,410 square feet) and retail/commercial and restaurant space (60,271 square feet). New buildings would be of Type 1 and Type II B construction (existing hotel is Type II B

construction) and vary in height up to six stories and 90 feet. The former Constance Hotel building will be renovated and retained within the project. All other existing structures will be removed to accommodate the project. The bank use, and possibly some of the existing retail/restaurant tenants, will also be included within the project. Total development would be approximately 261,305 gross square feet (including the 65,750 square feet renovated former hotel), resulting in a total Floor Area Ratio (FAR) OF 2.97:1, consistent with allowable FAR of 3:1 for seven of the eight site lots, and 2.75:1 for the remaining lot.

In order to comply with the development standards of the Zoning Code, the project requires several entitlements: Conditional Use Permit to restore the former Constance Hotel building; Minor Conditional Use Permits for new construction in a Transit oriented Development area, and for shared, tandem and valet parking; Variances including a reduction in loading spaces; Tentative Tract Map to merge existing lots and create condominium airspace lots; Design Commission Concept and Final Design Review, including approval of Height Averaging; and any other discretionary or ministerial approvals as may be required for adoption and implementation of the project. However, the project is consistent with the Central District Plan designated land use intensities and would not conflict with any land use plan, policy or regulation.

MINERAL RESOURCES

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.

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.

POPULATION AND HOUSING

The proposed project is consistent with the land use designations for the project site. 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.

PUBLIC SERVICES

Fire Protection

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 the project 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.

Libraries

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.

Parks

The City of Pasadena's Memorial Park, Central Park and Grant Park are located approximately one mile from the project site. 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 a public courtyard, a pool and recreation area and additional open space through extensive terraces and balconies.

Police Protection

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.

Schools

The project site is located in a developed area currently served by the Pasadena Unified School District (PUSD). The proposed project includes the construction of five condominium units, which could nominally 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.

Other Public Facilities

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.

RECREATION

The residents of the five condominium units, as well as employees and hotels guest would be anticipated to utilize City parks. 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, would be subject to recreation impact fees to fund recreational improvements, and would provide open space, including a public courtyard, a pool and recreation area and extensive terraces and balconies

UTILITIES

Solid Waste

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 required to comply with LEED Materials and Resources Prerequisites (including Storage and Collection of Recyclables) under the City's green building program.

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."