Response 32-1

Key goals in the Land Use Element and Central District Specific Plan include preserving the character of the Central District and ensuring that scenic qualities and views remain. The EIR examines the project in light of these programmatic-level goals and finds that impact will be less than significant, pointing out that individual development projects within the Central District will require plan review (and CEQA review where applicable) to ensure accomplishment of these goals.

Response 32-2

See Topical Response 7.

Response 32-3

See Topical Response 10. CEQA Guidelines Section 15088.5(a) states that "A lead agency is required to recirculate the EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review ... but before certification. As used in this section, the term information can include changes to the project or environmental setting as well as additional data or other information. New information added to the EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect ..." Changes to the Draft EIR have been made in response to comments received on the Draft EIR to clarify portions of the EIR by adding new information and correct typographical and graphical errors. The changes to the Draft EIR include neither a new significant environmental impact, a substantial increase in the severity of an environmental impact, nor a feasible project alternative or mitigation measure that would clearly lessen the significant environmental impacts of the project. Therefore, recirculation of the EIR is not required.

Response 32-4

Individual development projects pursuant to the adoption and implementation of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan will be required to analyze the construction impacts of the development project on the CEQA issue areas.

Response 32-5

See Topical Response 7. For the record, State law allows any element of a General Plan to be updated no more than four times a year (Public Resources Code Section 65358[b]). Housing Elements are required to be updated comprehensively every five years (Public Resources Code Section 65588[b]).

The commentor states that the EIR review process was rushed. CEQA Section 21091(a) states that the public review period for a draft environmental impact report may not be less than 30 days. If the draft environmental impact report is submitted to the State Clearinghouse for review, the review period shall be at least 45 days ..." The public review period began on June 4, 2004 and was scheduled to close on July 23, 2004. At the request of the Planning Commission and the public, the City extended the comment period for an additional 30 days. The public was given the opportunity

to comment on the Draft EIR for a total of 80 days. See Topical Response 10 for additional information.

Response 32-6

See Topical Response 10.

Response 32-7

See Topical Response 4. Also, CEQA does not establish any specific methodology for assessment and statement of traffic impacts.

Response 32-8

As stated in the EIR:

> The City will continue to provide and expand its community recreation activities and facilities as needed to support the community as it grows and look for opportunities to expand its shared use of facilities with the Pasadena Unified School District and other facilities. In addition to maintaining parks, the City currently operates several community centers and recreational programs, including fitness activities, classes, and programs for all ages. Additionally, to contribute to parkland acquisition, all residential projects, including those developed subsequent to the 2004 Land Use Element, are required to pay a residential impact fee in accordance with Section 4.17.050 of the Municipal Code. The Residential Impact Fee, created in 1988, is intended to tie increased costs of park maintenance to increased usage resulting from new residential development. On September 23, 2004, City Council amended the current fee of $3,659 per unit imposed on new residential development to $19,743 per unit, excluding affordable housing (as defined by State law).[1] The fee may escalate annually by the same percentage as the Consumer Price Index. When the Residential Impact Fee assess to the residential development project equals or exceeds $500,000, the developer may request to dedicate land, either on- or off-site, and develop a park in lieu of payment of the fee.[2] The fee must be paid when a building permit is secured ~~The current fee of $729 per unit (as amended in February 2003)[3] is imposed on new residential development and must be paid when a building permit is secured~~ (Final EIR, p. 187).
>
> The City will continue to provide and expand its community recreation activities and facilities as needed to support the community as it grows, and the Central District Specific Plan proposes several measures to provide recreational opportunities for its residents. However, land available for parks acquisition is at a minimum, and the City will continue to have a parkland deficit in the future. To increase the City's efforts to provide park facilities to its residents, the following mitigation measure is necessary:

[1] Gary Scott. Pasadena Star News. September 21, 2004.
[2] City of Pasadena. City Council Minutes. August 23, 2004.
[3] City of Pasadena. City Council Minutes. February 24, 2003.

1. The City will complete a pocket parks acquisition and development study, as discussed in the Central District Specific Plan, for the entire City. This study will determine what options are available to the City to improve park access to its residents, including working with private developers and property owners to provide publicly accessible open spaces as part of new development projects, identifying funding sources, and actively pursuing shared-use facilities with schools.

2. The City Council will continue to evaluate Pasadena's parks and recreation needs and adjust the Residential Impact Fee as necessary to expand and maintain the City's park system. Part of the evaluation may include establishment of a parklands standard against which the impact of future projects may be assessed (Draft EIR, p. 186).

Individual development projects proposed pursuant to the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan will be required to assess the impacts of the development project on parks and recreation. In addition, the City is in the process of updating the Green Space Element to address the City's parkland deficit.

With respect to the suggestion for courtyards and landscaped setbacks, courtyards cannot be credited toward provision of public open space, as they may be inaccessible to the general public. In many areas of the Central District, landscaped setbacks would run contrary to Central District Specific Plan goals of zero front setbacks for ease of pedestrian access and in keeping with the established character of the area.

Response 32-9

Increasing the distance of a building from the street through setback requirements will not mitigate the impact of traffic noise to a less than significant level. A setback of an additional foot or two will not distance the building from the source enough for the noise level to fall below a level of significance.[4] Therefore, noise attenuation through building materials is recommended in the Draft EIR to ensure that future projects will meet the California Noise Insulation Standard of 45 dB(A) or less (Draft EIR, pp. 109-110). See also Response 31-8.

The following excerpt from the Draft EIR lists the mitigation measures in Section 3.4 – Noise of the Draft EIR:

> Individual development projects will continue to comply with existing City standards and practices regarding noise/land use compatibility review and the control of stationary noise sources. These standards and practices include:
>
> - Preparation of an acoustical study for development projects in noise exposure areas defined as a "conditionally acceptable" zone in the General Plan Noise Element and incorporation of measures identified to reduce noise exposure
>
> - Compliance with the California Noise Insulation Standards to ensure acceptable interior noise levels

[4] City of Pasadena. *Revised Noise Element of the General Plan*. Prepared by Rincon Consultants, Inc. December 2002.

- Enforcement of the Noise Ordinance

Because implementation of the 2004 land use policy will allow residential and other noise-sensitive uses within "conditionally acceptable" noise exposure zones, the following mitigation is required and will be applied to applicable development projects:

1. The City will require that all new residential development and other noise-sensitive uses proposed in areas experiencing noise levels considered "conditionally acceptable" to incorporate noise-mitigating features identified in acoustical studies prepared for such development projects. Such features may include the following measures set forth in the Noise Element's "Noise Evaluation and Mitigation" section:

   a) If a 15-20 dB(A) reduction is needed, the following shall be included in development projects as directed by the Building Official:
      - Air conditioning or a mechanical ventilation system
      - Windows and sliding glass doors should be double-paned glass and mounted in low air infiltration rate frames (0.5 cfm or less, per American National Standard Institute [ANSI] specifications)
      - Solid core exterior doors with perimeter weather stripping and threshold seals

   b) If a 20-25 dBA reduction is needed, the following shall be included in development projects as directed by the Building Official:
      - Same as 1(a) – (c) above
      - Exterior walls consist of stucco or brick veneer. Wood siding with a 1/2" minimum thickness fiberboard underlayer may also be used
      - Glass in both windows and doors should not exceed 20% of the floor area in a room
      - Roof or attic vents facing the noise source should be baffled

   c) If a 25-30 dBA reduction is needed, the following shall be included in development projects as directed by the Building Official:
      - Same as 2(a) - (b) above
      - Attach interior sheetrock of exterior wall assemblies to studs by resilient channels; acceptable alternatives include staggered studs or double walls
      - Use window assemblies with laboratory-tested STC rating of 30 or greater (windows that provide superior noise reduction capability and that are laboratory-tested are sometimes called "sound-rated" windows. In general, these windows have thicker glass and/or increased air space between panes. In contrast, standard energy conservation double-pane glazing with a 1/8" or 1/4" air space may be less effective in reducing noise from some noise sources than single pane glazing).

The requirements may also include orientation of buildings to shield outdoor living space from noise sources, provision of acoustical barriers, and other effective measures (Draft EIR, pp. 109-110).

Response 32-10

The comment states that a master numbering system for the appendices in the Draft EIR would assist readers. In response, the Final EIR reflects a master numbering system of all appendices. The hard copy and electronic copy of the Final EIR are identical. Any missing pages in electronic version of the appendices to the Traffic Study (Appendix B in the Draft EIR) have been included in the Final EIR. For the record, complete bound copies of the Draft and Final EIRs have been available for public review at City libraries and at City Hall as noted on page 4 of the Draft EIR.

Response 32-11

College-owned student housing was not separated out and counted as residential dwelling units in the transportation model because college residence halls generate trips at much different rates and at different times of day than a residential subdivision or apartment building (Draft EIR, Appendix B: Traffic Study).

The Mobility Element transportation model was calibrated to accurately replicate existing conditions using the current population levels on college campuses in the City. The number of students was used as the independent variable in the trip generation equation to determine the amount of traffic generated by each campus. The total number of trips generated by each campus was compared to the actual traffic levels on the streets adjacent to the campuses in order to determine if the campus trip generation factors needed to be adjusted. The rates were adjusted to reflect actual traffic levels at each campus during the model calibration process. Thus, the trips generated by each campus include travel activity generated by the commuter students, students in residence halls, faculty, staff, and visitors to the campus (Draft EIR, Appendix B: Traffic Study).

The difference between the nature of on-campus residences at Fuller Seminary and Caltech was reflected in the model calibration trip generation of the two campuses (Draft EIR, Appendix B: Traffic Study).

Response 32-12

The comment states that Appendix B5 of Appendix B of the Draft EIR is missing. The commentor was provided with the information requested. The Final EIR contains all subparts of Appendix B in the proper order. See also Response 31-10.

Response 32-13

See Topical Response 8 for a discussion of the alternatives chosen for analysis. The EIR refers to the 710 Freeway as I-710 because this is how it is referred to publicly and known to the community.

Response 32-14

Please see Topical Response 9 for a discussion of development caps and the analysis undertaken by the City to determine the development thresholds assumed in the EIR. The removal of development caps established by the 1994 General Plan is a policy issue and outside of the scope of the environmental analysis undertaken in the EIR. The EIR addresses at a program level the

environmental impacts associated with implementation of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific, including the impacts of development anticipated through horizon year 2015.

Response 32-15

Topical Response 8 provides a discussion of the analysis of alternatives discussed in the EIR. The No Project Alternative (Alternative 1, Draft EIR, pp. 203-206) is required by CEQA. Alternatives 2 through 7 were chosen to minimize the significant effects of the project, particularly the traffic impacts, which are of greatest concern to the City and the public. The alternatives were chosen to show the progressive impacts of decreased citywide growth levels compared to the project, as well as potential mitigating effects of proposed major transportation improvements. This information is considered necessary for the City Council to make an informed choice about the effects of the project.

Alternative 7: Physical Improvements examines additional physical improvements that could be undertaken at the intersections projected to operate at LOS E and F as a result of the project. The EIR explains:

> The 2004 Mobility Element includes policies that discourage the physical widening of any extended roadway corridor in the City. However, the Element does permit the selective widening of intersections to remove congestion bottlenecks. This alternative investigates the key study intersections to identify physical improvements that could be employed to eliminate anticipated congestion at those intersections projected to operate at LOS E or F.
>
> The 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan would be implemented under Alternative 7. The following analysis examines both the project and the 50% growth scenario and assumes that the Gold Line light rail service would be extended to Claremont. The completion of the I-710 Freeway is not assumed.
>
> Alternative 7, under both the project and 50% growth conditions, could involve the removal of buildings to achieve intersection improvements and thus, at selected locations, could result in aesthetic, cultural resource, geology and soils, hazards and hazardous materials, hydrology, population and housing, and utility system impacts. Each of these would need to be investigated and mitigated at the project-specific level (Draft EIR, pp. 229-235).

As described, undertaking the suggested physical improvements would require the removal of some buildings. However, such mitigation would reduce impact to a single intersection operating at LOS E: Arroyo Parkway and California Boulevard. All other intersections would be mitigated to a less than significant impact. Alternative 7: Physical Improvements is the full mitigation alternative offered in the EIR.

Response 32-16

See Topical Response 8. CEQA allows the analysis of alternatives to be less detailed than the analysis of the project (CEQA Guidelines Section 15126.[f]). To make a determination that noise impacts would be greater if the No Project Alternative were to be adopted requires knowing where future development projects will locate. This is a program-level EIR that analyzes the overall effects of projected citywide development in 2015 compared to existing conditions in 2004. The EIR provides the following analysis of noise impacts for Alternative 1: No Project Alternative:

> Similar to the proposed project, the No Project Alternative would potentially allow future residential development, under some conditions, to locate in areas where noise/land use conflicts cannot be fully mitigated. These areas are directly associated with proximity of residential neighborhoods and mixed-use areas to the freeways (Draft EIR, p. 205).

Individual development projects pursuant to the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan will be required to analyze the project-specific noise impacts of the proposed development project. These development projects will be required to implement the following mitigation measures provided in the EIR, as well as additional mitigation measures deemed appropriate by the City at the time of approval of the development project:

> Individual development projects will continue to comply with existing City standards and practices regarding noise/land use compatibility review and the control of stationary noise sources. These standards and practices include:
>
> - Preparation of an acoustical study for development projects in noise exposure areas defined as a "conditionally acceptable" zone in the General Plan Noise Element and incorporation of measures identified to reduce noise exposure
>
> - Compliance with the California Noise Insulation Standards to ensure acceptable interior noise levels
>
> - Enforcement of the Noise Ordinance
>
> Because implementation of the 2004 land use policy will allow residential and other noise-sensitive uses within "conditionally acceptable" noise exposure zones, the following mitigation is required and will be applied to applicable development projects:
>
> 1. The City will require that all new residential development and other noise-sensitive uses proposed in areas experiencing noise levels considered "conditionally acceptable" to incorporate noise-mitigating features identified in acoustical studies prepared for such development projects. Such features may include the following measures set forth in the Noise Element's "Noise Evaluation and Mitigation" section:
>
> a) If a 15-20 dB(A) reduction is needed, the following shall be included in development projects as directed by the Building Official:

- Air conditioning or a mechanical ventilation system
- Windows and sliding glass doors should be double-paned glass and mounted in low air infiltration rate frames (0.5 cfm or less, per American National Standard Institute [ANSI] specifications)
- Solid core exterior doors with perimeter weather stripping and threshold seals

b) If a 20-25 dBA reduction is needed, the following shall be included in development projects as directed by the Building Official:
- Same as 1(a) – (c) above
- Exterior walls consist of stucco or brick veneer. Wood siding with a 1/2″ minimum thickness fiberboard underlayer may also be used
- Glass in both windows and doors should not exceed 20% of the floor area in a room
- Roof or attic vents facing the noise source should be baffled

c) If a 25-30 dBA reduction is needed, the following shall be included in development projects as directed by the Building Official:
- Same as 2(a) - (b) above
- Attach interior sheetrock of exterior wall assemblies to studs by resilient channels; acceptable alternatives include staggered studs or double walls
- Use window assemblies with laboratory-tested STC rating of 30 or greater (windows that provide superior noise reduction capability and that are laboratory-tested are sometimes called "sound-rated" windows. In general, these windows have thicker glass and/or increased air space between panes. In contrast, standard energy conservation double-pane glazing with a 1/8″ or 1/4″ air space may be less effective in reducing noise from some noise sources than single pane glazing.)

The requirements may also include orientation of buildings to shield outdoor living space from noise sources, provision of acoustical barriers, and other effective measures (Draft EIR, pp. 109-110).

Response 32-17

Increased setback from roadways and additional landscaping requirements will not reduce PM_{10} pollutant emissions or CO hot spot impacts to a less than significant impact. As explained in the Draft EIR:

> Pasadena lies within the South Coast Air Basin, a 6,600-square-mile area bounded by the Pacific Ocean on the west and the San Gabriel, San Bernardino, and San Jacinto mountains on the north and east. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. Due to the unique topography and meteorology of the Basin, ozone (O_3) levels are some of the highest in the country and are expected to continue to violate federal and State ambient air quality standards in spite of vigorous control measures. High levels of respirable particulate matter (PM_{10}) also continue to violate federal and State standards (Draft EIR, p. 111).

Furthermore, the EIR examines at a program level the difference between existing conditions in 2004 and buildout in accordance with the land use thresholds identified in Table 2. For the Alternative 1: No Project Alternative, the EIR states:

> Air pollutant emissions are tied to traffic volumes. As a result of increased vehicle trips and increased delays at intersections located throughout the planning area, air pollutant emissions would be expected to increase, and CO hot spots could be created at some intersections (Draft EIR, p. 205).

Applicants for individual development projects will be required to assess the air quality impacts of such development. Each development project must comply with the following mitigation measures listed in the EIR:

> The following mitigation measures will be applied to individual development projects subject to CEQA review:
>
> 1. Dust Control (PM_{10})
>
> - Water all active construction areas at least twice daily.
> - Cover all haul trucks or maintain at least two feet of freeboard.
> - Pave or apply water four times daily to all unpaved parking or staging areas.
> - Sweep or wash any site access points within 30 minutes of any visible dirt deposition on any public roadway.
> - Cover or water twice daily any on-site stockpiles of debris, dirt or other dusty material.
> - Suspend all operations on any unpaved surface if winds exceed 25 mph.
> - Hydroseed or otherwise stabilize any cleared area which is to remain in active for more than 96 hours after clearing is completed.
> - Ensure that all cut and fill slopes are permanently protected from erosion.
>
> 2. Emissions (NO_x)
>
> - Require the construction contractor to ensure that all construction equipment is maintained in peak working order.
> - Limit allowable idling to 10 minutes for trucks and heavy equipment.
>
> 3. Off-site Impacts
>
> - Encourage car pooling for construction workers.
> - Limit lane closures to off-peak travel periods.
> - Park construction vehicles off traveled roadways.
> - Wet down or cover dirt hauled off-site.
> - Wash or sweep away access points daily.
> - Encourage receipt of materials during non-peak traffic hours.
> - Sandbag construction sites for erosion control.

Mitigation is required to reduce particulate matter (PM_{10}) emissions. Policies within the 2004 Land Use and Mobility Elements will facilitate continued City cooperation with SCAQMD and SCAG to achieve regional air quality improvement goals, encourage alternative transportation modes, and implement transportation demand management strategies. In addition to these policies, the following mitigation measures are required to reduce PM_{10} air quality impacts:

4. In accordance with AQMD Rule 403, the City shall require the following measures to be taken during the construction of all projects to reduce the amount of dust and other sources of PM_{10}:

    - Dust suppression at construction site using surfactants and other chemical stabilizers
    - Wheel washers for construction equipment
    - The watering down of all construction areas

5. The City will continue to implement effective citywide street sweeping.

6. The City will use Best Available Control Technology in its practices, including but not limited to advanced diesel particulate traps on all City vehicles and purchase and use of aqueous diesel fuel vehicles.

Furthermore, because Pasadena lies in a non-attainment area, the City may consider the following mitigation measures to further reduce air impacts within the South Coast Air Basin:

7. The City will implement transportation systems management techniques that include synchronizing traffic signals and limiting on-street parking.

8. The City will encourage major employers, tenants in business parks and other activity centers, and developers of large new residential developments to participate in transportation management associations.

9. The City will work to divert commercial truck traffic to off-peak periods to alleviate non-recurrent congestion as a means to improve roadway efficiency and reduce diesel emissions.

At the individual project level, it is recommended that the City apply the following mitigation measures which will work toward regional emissions reductions:

10. The City will encourage the incorporation of energy conservation techniques (i.e. installation of energy saving devices, construction of electric vehicle charging stations, use of sunlight-filtering window coatings or double-paned windows, utilization of light-colored roofing materials as opposed to dark-colored roofing materials, and placement of shady trees next to habitable structures) in new developments (Final EIR, pp. 127-129).

Response 32-18

The commentor misunderstands the role of Section 4.0 – Alternatives. The analysis of the alternatives is intended to disclose in a generalized manner the impacts of adopting a different project from the proposed project. CEQA does not require the same level of analysis for project alternatives (CEQA Guidelines Section 15126.6[d]). Also, analysis of a No Project alternative is specifically required (CEQA Guidelines Section 15126.6[e]) to provide decision makers with full information.

Response 32-19

As stated in the EIR:

> The No Project Alternative would not implement the 2004 Land Use and Mobility Element, Zoning Code Revisions, and Central District Specific Plan. Therefore, the No Project Alternative would not meet the objectives of the proposed project (Draft EIR, p. 206).

Therefore, Alternative 1: No Project Alternative would not meet the following objectives of the City for the project:

2004 Land Use Element

- Growth will be targeted to serve community need and enhance the quality of life.
- Change will be harmonized to preserve Pasadena's historic character and environment.
- Economic vitality will be promoted to provide jobs, services, revenues, and opportunities.
- Pasadena will be promoted as a healthy family community.
- Pasadena will be a city where people can circulate without cars.
- Pasadena will be promoted as a cultural, scientific, corporate, entertainment, and educational center for the region.
- Community participation will be a permanent part of achieving a greater city.

2004 Mobility Element

- Livable and economically strong community will be promoted.
- Non-auto travel will be encouraged.

- Neighborhoods will be protected by discouraging traffic from intruding into community neighborhoods.

- ~~Traffic on m~~Multimodal corridors will be managed to promote and improve citywide transportation services.

Central District Specific Plan

- Central District will function as Pasadena's vibrant urban core with a distinctive character.

- Downtown will provide a diversity of economic, residential, and cultural opportunities.

- Downtown will be a place to live, work, shop, and play.

- Downtown will provide a convenient access by foot, bicycle, and transit, as well as by car.

- Physical and economic growth will be harmonized to enhance existing businesses, respect neighborhoods, and respect the numerous resources of historical and cultural significance that contribute to Downtown's unique identity (Final EIR, p. 206).

Response 32-20

See Topical Response 1 for a discussion of the traffic model.

Response 32-21

The commentor states that there are numerous discrepancies in the Draft EIR regarding redevelopment plans. The information provided in the Draft EIR has been taken from the City's Redevelopment website, located at http://www.cityofpasadena.net/planninganddevelopment/development/redevelopment.asp.

The information in the EIR regarding redevelopment project areas is presented for general informational purposes to describe other existing City plans and programs that implement the Land Use Element. The redevelopment plans are not part of the project analyzed in this EIR. The balance of the comments presented here addresses consistency between redevelopment plans and zoning designations/maps not included in the policy documents subject to this EIR. As these items are not part of the project, they are not addressed in the EIR.

Response 32-22

See Topical Response 9 for an explanation of the land use assumption on which the EIR is based. The comment misstates the analysis in the EIR. Section 3.3 – Population and Housing discusses population growth as follows:

> **2004 Land Use Element and Zoning Code Revisions**
> Land use policies will allow for growth in both the housing and nonresidential sectors of the community. As discussed in detail in Section 3.1 – Land Use of this EIR, the number of total housing units permitted by 2004 land use policy through horizon year 2015 is 61,323 units (6,581 potential net new housing units). Assuming an average household size of 2.58 persons,[5] the estimated population of Pasadena by 2015 will be 158,213 persons. This represents an estimated addition of 16,999 persons, or a 12% increase in population over the next 11 years (Draft EIR, p. 88).
>
> **Central District Specific Plan**
> The 2004 Land Use Element and Zoning Code Revisions target future development within seven specific plan areas to guide Pasadena's future growth. Specifically, land use policies target 41% of all new residential growth and 25% of new commercial square footage into the Central District Specific Plan area in the form of high-density mixed-use development. In comparison to the other specific plan areas and those portions of Pasadena not within a specific plan area, the Central District is the City's established urban core and the most suitable location for a large portion of Pasadena's population growth.
>
> According to targeted development policies of the 2004 Land Use Element, 2,750 new residential units and 1.25 million square feet of nonresidential development are permitted to be built within the Central District over the next 11 years. Based on an average household size of 2.58 persons, the Central District will add 7,095 persons to Pasadena's population by 2015, which represents a 63% increase in population within the Central District over the next 11 years.[6] This represents an average annual growth rate of 5.7% to achieve the remaining development potential within the Central District (Draft EIR, p. 89).

The above paragraph from the EIR specifically discusses a 63% increase in growth *in the Central District* (emphasis added) and not citywide. The words "within the Central District" have been added for clarity (Final EIR, p. 93).

Response 32-23

Topical Response 1 provides an explanation of the Mobility Element traffic model, including how P.M. peak-hour trips are accounted for in the model.

Response 32-24

The EIR does not address the number of people to be displaced because the EIR does not assume a reduction in the total number of housing units over the amount currently available. The Draft EIR states:

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[5] California Department of Finance.
[6] City of Pasadena. March 2004.

> The 2004 Land Use Element will result in modest housing growth in Pasadena. Residential buildout pursuant to land use policies will result in an estimated 61,323 dwelling units, an increase of 6,581 units over the next 11 years.[7] As shown in Table 2 in Section 2.0 – Project Description (page 16), new housing development will be targeted in the seven specific plan areas, primarily around the six Gold Line light rail station (Draft EIR, p. 90).

The comment inaccurately states what is presented in the EIR. The comment confuses the term "household" used in the traffic study with "housing units" used in the EIR. The U.S. Census Bureau defines household as a social unit living together; a housing unit is a house, apartment, group of rooms, or a single room occupied as separate living quarters.[8] Appendix B – Traffic Study (page 8) is based on the following assumptions:

> **Baseline Year 2000 Conditions**
> Baseline conditions represent Year 2000 conditions, and are based on a series of daily and peak hour traffic counts taken at the outset of the Mobility Element Update planning process.
>
> The Year 2000 Baseline land use levels within the City of Pasadena are as follows:

Land Use Year	2000 Baseline Level
Residential	51,879 households1
Commercial	9,363,250 square feet
Office	11,680,950 square feet
Industrial	5,507,850 square feet
Institutional	5,803,025 square feet

> Appendix A contains the summary of existing and future land use by traffic analysis zone.
>
> **Future Year 2015 Conditions with the Project**
> Future Year 2015 with the Project includes the land use growth associated with the Draft Land Use Element. Transportation improvements associated with the Draft Mobility Element include operational improvements, physical changes to the street system, additions to the local ARTS bus system, bicycle and pedestrian system improvements, and policy changes aimed at supporting the transportation/land use interface. The changes proposed in the City Zoning Code, specifically the effects of reduced long-term parking requirements in the Central District Specific Plan and around the Transit Oriented Districts, are also included in the Future with Project scenario.
>
> The completion of the Interstate 710 from Interstate 210 southerly to Interstate 10 is not assumed in this scenario nor is the extension of the Gold Line Light Rail Transit service to Claremont.

[7] Ibid.
[8] U.S. Census Bureau. http://www.census.gov/.

The Draft Mobility Element is intended to accommodate the travel demands generated by the levels of development facilitated by the Draft Land Use Element and the Draft Central District Specific Plan:

Land Use Year	2015 Level
Residential	59,628 households
Commercial	11,886,860 square feet
Office	14,065,820 square feet
Industrial	6,951,180 square feet
Institutional	7,619,840 square feet

Response 32-25

Since the 75% and 50% growth alternatives were intended to show the effects of limiting future growth in Pasadena, the assumption was made that the reduction in growth would be citywide and would be proportional. Thus, all traffic analysis zones that were forecast to experience growth (residential, commercial, or institutional) were revised to reduce that forecast growth by either 25% or 50%. Since the growth reductions were proportional over the entire City, no "extra" reductions were taken in any one area. With the reduced growth alternatives, it is true that development levels set forth in approved Specific Plans may not be achieved.

On a zone-by-zone basis, there are virtually an infinite number of ways to reduce the growth in Pasadena by 25% or by 50%. The modeling choice was made to reduce the growth proportionally over the entire City. It is not reasonable to expect that all possible combinations of land uses changes would be tested. The intent of the "Reduced Growth" alternatives was to measure the overall performance of the transportation system under the assumption of reduced growth in Pasadena (relative to the project). The assumption of proportional citywide reductions gives decision makers a reasonable picture of system performance under reduced growth. The results suggest that the reduction of trips generated by land uses in Pasadena by 25% or by 50% does not result in the same level of reduced congestion on City streets because background through-traffic takes advantage of the reduction in the number of trips generated by Pasadena trips, and the resulting congestion on City streets under these two alternatives is closer to the 100% growth levels than one would expect. The project traffic engineer indicates that these results would not change much if the land use growth reduction was distributed differently; therefore, the alternatives are representative of the concept tested.

The traffic modeling was not random. The modeling was based on a mathematical calculation of the amount of reduction in land use (and therefore trips) that would occur in each traffic analysis zone in the system.

Response 32-26

See Topical Response 10.

Response 32-27

The comment is noted. The proposed changes are typographic changes. These tables have been revised in the Final EIR to reflect proper use of "street" and "avenue."

Response 32-28

See Topical Responses 3 and 4.

Response 32-29

See Response 32-15.

Response 32-30

See Topical Responses 3 and 4.

Response 32-31

The 2000 ICU methodology referred to in the comment has not been adopted by any city in Southern California. The firm developing/marketing the software has an updated 2003 version available, but the project traffic engineer indicates that experience with either version is very limited. The Southern California Section of the Institute of Traffic Engineers has formed a committee to review the software, but any review by the committee is not expected until mid-2005. This software was not available when the Mobility Element Update study began.

There are basically three capacity calculation methodologies in practice today: Intersection Capacity Utilization (ICU), Critical Movement Analysis (CMA), and Highway Capacity Manual (HCM). Each has its advantages and disadvantages and each has its advocates. The 2000/2003 ICU referred to in the comment is a variation of the ICU methodology used throughout Southern California.

The ICU is the most straightforward of the three methods and its results are the simplest to understand. Because of these attributes, many cities (Pasadena included) prefer and require the use of this methodology. The CMA methodology is used by the City of Los Angeles and by Los Angeles County MTA for the analysis of the Congestion Management Program network (although MTA will accept any of the three methodologies for CMP analyses). The HCM methodology is the national standard for preparing intersection capacity calculation, but it is most useful for detailed signal timing and signal operations and much less useful for planning studies. The input data requirements are substantial and the output data not very user-friendly. Neither the ICU nor the CMA methodologies take pedestrian movements into account.

In planning studies, the selection of the methodology has reduced importance because the basic premise of a planning study is the comparison of the results of the "with project" condition to the "before project" condition. Therefore, the test of proposed project impacts is based on the incremental difference of "before and after" conditions. All three methods will give relatively the same answer for the starting point of the calculation, and all three methods will yield similar results for the incremental impact caused by project traffic.

Since it is the incremental difference that is the important part of project evaluation, the selection of the methodology is not as critical as the comment implies. As long as the amount of pedestrian activity does not vary dramatically among alternatives, which is the case in the Central District land

use alternatives, the future pedestrian activity levels will be a constant among the alternatives and will not affect the incremental difference among alternatives.

The ICU methodology has been used by all traffic planning studies in the City of Pasadena for the past 10 to 15 years. The Draft EIR is consistent with all traffic analyses performed in the City.

Response 32-32

The Intelligent Transportation System techniques involve much more than just signal timing. ITS strategies include communication techniques, closed circuit televisions, changeable message signs, motorist information systems, system-wide control strategies, and the ability to instantly change strategies as traffic conditions change.

The City of Los Angeles has documented increases in the number of vehicles through an intersection as a result of the application of ITS technology. The estimate of 7% increase in lane capacity is based on extensive research performed by the City of Los Angeles as City staff conducted before and after studies of the ITS systems. Increases of over 10% in intersection capacity are resulting from second generation of ITS systems now being implemented by the City of Angeles. To be conservative, an estimate of only 7% was used in the Pasadena Mobility Element analysis, but by the horizon year 2015, this target should be able to be exceeded.

The application of the 7% increase in capacity is appropriate in the ICU calculation. The ICU calculation compares the amount of traffic projected to use an intersection (the volume) to the estimated capacity of the intersection (the capacity) to calculate a volume/capacity ratio for the intersection. The capacity of the intersection is measured by multiplying the number of lanes serving the intersection by the hourly capacity of each lane. If ITS technology increases the hourly capacity of each lane by 7%, then the capacity of the intersection is increased by 7%. The ICU calculation is modified to account for a higher intersection capacity with the ITS in place. The hourly capacity of the intersection is not dependent on signal timing in the ICU calculation but on the hourly capacity of each lane, which is why the ITS factor can be applied.

Response 32-33

Appendix B in Appendix B (the traffic study) of the Draft EIR includes the worksheets used to determine intersection LOS for existing and future with project intersection conditions. The model output listing lane miles under the different project scenarios and the alternatives is provided in the text of the traffic study in Appendix B of the Draft EIR. As discussed in Topical Response 4, key intersections were chosen for analysis in the EIR. Topical Response 10 explains that CEQA does not require the same level of detail for the analysis of alternatives as is necessary to determine the impacts of the project. Thus, intersection LOS was not calculated for the alternatives, and the reader will not find intersection-level worksheets in Appendix B of the Draft EIR.

Response 32-34

Alternative 7 compares the number of intersections that will operate at LOS E and F in horizon year 2015 with the project. Next, Alternative 7 lists the intersections that will operate at LOS E and F under the following conditions: Alternative 3A: Extension of the Gold Line, Alternative 2B: 50% Growth, and Alternative 3 C: 50% Growth and Extension of the Gold Line. The purpose of this

analysis is to focus on only those intersections that will operate at LOS E and F even after major transportation improvements are untaken. As shown in Table 57 (Draft EIR, page 231), after citywide development is reduced to 50% of growth and the Gold Line is assumed to be extended to Montclair, four intersections will operate at LOS E and F. Through the implementation of intersection improvements listed in Alternative 7, only one intersection will continue to operate at LOS E. Table 57 shows the model output of the analysis for the four different scenarios examined with this alternative.

Response 32-35

Intersections 1, 6, 10, and 17 have different lane configurations in 2000 and 2015 because the lane configurations in year 2015 reflect certain improvements implemented as part of the 2004 Mobility Element. The improvements are listed in the Draft EIR as follows:

> The 2004 Mobility Element includes operational improvements, physical changes to the street system, additions to the local ARTS bus system, bicycle and pedestrian system improvements, and policy changes aimed at supporting the transportation/land use interface (detailed below). The 2004 Mobility Element does not assume that completion of I-710 from I-210 southerly to I-10 will take place by 2015 (Draft EIR, p. 72).

Table15
Improvements Included in the 2004 Mobility Element

Central District	Citywide
1. Glenarm from Raymond Ave to Arroyo Parkway – EB right-turn lane onto freeway 2. Directional signage between Pasadena Freeway and I-210 3. EB Right turn lane at California/Fair Oaks 4. Arroyo Parkway street enhancement and traffic signal upgrades 5. Raymond Avenue widening from Del Mar to Glenarm 6. Lake/Walnut NB right turn lane 7. California/Raymond WB right turn lane 8. Intelligent Transportation System (ITS) corridor improvements along Central District corridors: a. Marengo from Orange Grove to Del Mar b. California from St. John to Arroyo Pkwy. c. Cordova from Arroyo to Hill d. Del Mar from Orange Grove to Rosemead e. Orange Grove from SR 134 to Sierra Madre Villa f. Fair Oaks from Orange Grove to North City Limits g. Los Robles from Del Mar to North City Limits 9. Fair Oaks ITS from Orange Grove to South City Limits 10. 3 lanes WB and 2 lanes EB on Del Mar from Raymond to Pasadena 11. 3 lanes WB and 2 lanes EB on California from St. John to Fair Oaks 12. 3 lanes SB and 2 lanes NB on Fair Oaks from California to Glenarm 13. Glenarm widening from Fair Oaks to Arroyo Parkway 14. Fourth NB lane on Lake Avenue from Walnut to Corson	A. Restripe San Gabriel Boulevard for three lanes each direction from I-210 to Huntington Drive during peak hours B. Intelligent Transportation System (ITS) corridor improvements along all Principal Multimodal Corridors

Response 32-36

The comment states that the project worksheets indicate changes in the number of lanes for Alternative 7 whereas this is not provided for the other alternatives analyzed. Alternative 7 includes physical improvements to intersections as part of the alternative; thus, lane configuration changes are proposed. None of the other alternatives proposes changes to streets or intersections and instead focus on major transportation improvements, such as extension of the Gold Line to Montclair and completion of I-710.

Response 32-37

See Response 32-35.

Response 32-38

The commentor is referring to the "Double Lt Penalty" data line on the capacity calculation worksheets. This is a reference to a Double Left Turn Lane Penalty and not to Double Light Penalty as he assumed. The penalties for the at-grade rail crossings were taken in the model assignments themselves by reducing the capacity of the roadways that crossed the light rail lines at grade.

Response 32-39

See Response 32-32 for a discussion of the technical back-up for the 7% increase in capacity. Intersections 1 and 2 are controlled by Caltrans and therefore it was not assumed that these intersections would be connected to the Pasadena Transportation Management Center.

Response 32-40

See Response 32-38.

Response 32-41

The City currently has a traffic signal coordination system in place on certain corridors within City limits. The City estimates that these coordinated systems increase the capacity of the intersections by approximately 5% over non-coordinated signals. This 5% capacity increase was assumed to continue in the No Project scenario.

The Project recommends upgrading the ITS system within the City and therefore a capacity increase similar to that measured by the City of Los Angeles was used for the Year 2015 Project conditions and for all future with project alternatives (Alternatives 2A, 2B, 3A, 3B, 3C, 4A, 4B, 4C, 5, 6, 7, and 8).

Response 32-42

See Response 32-41.

Response 32-43

The commentor is correct. These two intersection tests incorrectly used the Alternative 7 mitigated cross-section instead of the existing cross-section. The corrected calculations are shown in the Final EIR in Table 18.

Response 32-44

There is no test of Alternative 3A in combination with Alternative 7. The capacity calculation worksheets for Alternatives 3A and 7 were inadvertently reversed in Appendix B-7 and B-8. This error has been corrected in the Final EIR. Appendix B-7 reports the results for Alternative 7 as is shown on the title of each page in Appendix B-7 (Recommended Plan (2015) With Gold Line, No 710, With Intersection Mitigation). The additional lane on Maple is shown on the worksheet for

Intersection 13 in this appendix. Appendix B-8 reports the results for Alternative 3A, as is shown on the title of each page (50% Growth with Gold Line Extension, No 710).

Response 32-45

The commentor requests analysis of both congestion at intersections and volume-to-capacity (V/C) ratio on street segments in addition to the analysis of lane-miles operating at LOS E and F. As explained in Topical Response 4, the 2004 Mobility Element uses both intersection and corridor (lane-mile) LOS as the primary measure of transportation system performance. This is the measure that the public and the decision makers in Pasadena are most familiar with, and it was felt that the consistency of reporting would be beneficial by presenting the most useful measurement. Furthermore, discussion of future transportation in lane-miles operating at LOS E and F is appropriate at the program level. Each individual development project pursuant to the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan for which a traffic study is required will require evaluation of traffic impacts specific to that project in accordance with the City's transportation review guidelines. These site-specific studies which will show specific data to indicate if significant impacts will occur and where those impacts will be located in relation to the City's transportation network.

Response 32-46

The commentor confuses the summary of number of miles of street segments with the number of lane-miles of street. The summary of street miles versus lane-miles would be as follows:

Classification	Lane-Miles	Miles of Street	Average Width
Arterial	409	95	4.3
Collector	151	53	2.8

Source: Kaku Associates, Inc. September 2004.

The average arterial is slightly wider than four lanes. Since most arterials are four lanes, with a few six-lane streets, this makes sense. Likewise, most collector streets are two-lane streets with a few four-lane segments; thus, the 2.8 lane average is consistent with the expected width. The commentor's analysis confirms the data in the model.

The DEIR uses the same model as was used in the 2004 Mobility Element; therefore, the two reports document exactly the same set of streets.

The Mobility Element model did not include every local residential street in the Pasadena street system because it was not the intent of the Mobility Element to make local streets in the City available for assignment of non-residential traffic. Instead, the Mobility Element model included all arterial and collector streets in the system.

The 623 street segments referred to in the comment were included in the Mobility Element model. The streets in the model were reviewed by City staff and by the public during a series of neighborhood meetings held throughout the City during 2000 to 2002.

Response 32-47

Providing the LOS data for each of the 623 street segments for each of the 30 sets of data provided in the Draft EIR would result in over 37,000 LOS calculations in the report. This would be very difficult to review and compare; therefore, the City determined it more effective for ease of presentation and comprehensive to summarize the data on a system-wide basis. The data was summarized for the Central District since most of the growth in the 2004 Land Use Element is to be focused within the Central District.

Response 32-48

Please refer to Comment Letter 18 from Caltrans on page 484 of the Final EIR.

Response 32-49

Page 36 of the 2004 Mobility Element explains that the "Conventional Classification" categories recognized by the federal and state governments is for the purpose of securing funding for projects.

The four east-west streets referred to in the comment were designated as Multimodal Corridors to accommodate traffic to/from the Central District. The intent of the designation is to focus traffic on these four corridors, thus protecting the residential neighborhoods north and south of the I-210 freeway.

Response 32-50

Hudson and Mentor Avenues were not designated as Multimodal Corridors because their primary role is to move traffic generated by land uses along the Lake Avenue corridor to/from the I-210 freeway. Their role is more limited than Green and Union Streets, which move traffic across the entire Central District.

Response 32-51

Many of the maps were simplified to allow for clear labeling of street names. The map of Study Intersections, for example, did not include every collector street in the City so that the location of the 18 study intersections could be more clearly identified.

Response 32-52

The Mobility Element model included virtually every street in the Central District. Thus, the analysis of the streets in the Central District includes the analysis of those "local" streets that serve the higher-density land uses.

Response 32-53

See response to Topical Comment 3 for a discussion of the selection of study intersections.

Response 32-54

It is not a correct analytical technique to simply extrapolate the performance of the intersections selected for detailed study and apply that performance to all other intersections in the Central District/City. Many of the 112 Central District signalized intersections not studied are minor locations that will continue to operate at acceptable Levels of Service well beyond the 2015 horizon year tested as part of this study, as is evidenced by the continued performance of the street segments in the Central District and citywide totals presented in Tables 6 and 7 of Appendix B of the DEIR.

The comment suggests that the intersection analysis shows 5 of the 11 Central District intersections operating at LOS E or F, and therefore one should expect that 45% of all of the intersections in the Central District operate at LOS E or F. The data in Table 7 of Appendix B of the Draft EIR show that in 2015, it is expected that 5.5% of the Central District street system would operate at LOS E or F. Extrapolating this data would suggest that one could expect 7 intersections of the 122 Central District area signalized intersections to operate at LOS E or F (not 49 as suggested in the comment). In fact, neither of these "extrapolation" procedures is mathematically correct.

Response 32-55

As stated in Response 32-51, the map referenced is a simplified version of the City map. The map allows readers to more clearly identify the street names of the intersections studied. See Response 31-54 above for a discussion of the inappropriateness of extrapolating the results on intersection LOS studies.

Response 32-56

The commentor is correct that it is important to know where future impacts will occur so that land use and mobility decisions can be made. This is why the Mobility Element model was used to test every alternative studied. The performance of all study segments of the street system was evaluated under the various land use alternatives and then mobility alternatives were tested to determine the performance of the street system with those improvements in place. Every individual development project under consideration in Pasadena will use the results of the Mobility Element model to forecast the traffic growth on a corridor-by-corridor basis so that the effects of traffic growth on the key intersections can be evaluated. By the nature of a General Plan, every individual intersection in the City does not have to be tested and measured in order to be able to determine the adequacy of the future performance of the transportation system.

Response 32-57

The comment suggests that approximately 350 intersections be studied for all 15 alternatives presented in the DEIR. This represents over 5,000 intersection capacity calculations. The project traffic engineer indicates that over 5,000 intersection capacity calculations coupled with the 37,000 street segment capacity calculations requested in the commentor's letter dated August 14 would not add to the clarity of the presentation of study results.

Response 32-58

The DEIR analyzed the impacts of project traffic on the freeway system for the three freeway segments that are included in the Congestion Management Plan system. The Mobility Element model included all freeway segments in the model; therefore, the effects of the freeway system on the City street system (and vice versa) are included in the analysis.

The model assigned both regional and Pasadena trips to the street system (both freeway and City street system) according to the minimum time path available to each trip. Congestion on the freeway and the surface street systems was considered in the assignment of the trips.

The comment is correct that growth in Pasadena over the next 15 years will result in a significant impact on eastbound I-210 at Rosemead. This impact is identified in Table 21 of the DEIR and in Table 20 of Appendix B of the DEIR.

As described in the response to the Caltrans letter (Letter #18), the level of increased traffic on the freeway created by the proposed project can be offset by the extension of the Gold Line to Claremont and by implementation of rapid bus service from Pasadena to Glendale and Hollywood.

Response 32-59

The three freeway segments analyzed were the Congestion Management Plan (CMP) segments in the Pasadena area. This method of selection of CMP freeway segments is consistent with MTA and Caltrans guidelines.

Response 32-60

The 2004 Mobility Element calls for the type of cooperation and lobbying with regional agencies and for regional improvements that are discussed in the comment. The comment is correct that the overall system is at the level of operations where a major incident on one element of the system affects other system components. If the freeway is closed by an accident or an incident, the traffic will spill over onto city streets. This condition will exist no matter how wide the freeway is.

Response 32-61

The possibility of further widening the I-210 through Pasadena or through East Pasadena was discussed with the community during the portion of the study that defined alternatives to be studied. The community rejected the idea of freeway widening, opining that such widening would simply encourage more through traffic from the east to travel through Pasadena.

The further widening of I-210 was not studied as part of the project because:

a. A freeway widening project would require the demolition of a large number of homes and businesses along the corridor,
b. The widening is inconsistent with the stated policy of the Mobility Element to prohibit corridor widening, and
c. It is unlikely that any freeway widening project of the type discussed in the comment could be completed within the time horizon of the study (2015).

In terms of the additional eastbound lane on I-210, Caltrans' general practice is to balance the capacity of a freeway in both directions. Also, the project traffic engineer indicates that it would likely take a widening all the way to I-605 for the effects to be felt on Pasadena streets.

The potential that Caltrans would add more on ramps to the I-210 freeway west of Lake Avenue is low. Federal and State standards establish the needed spacing of freeway on-ramps, and the current spacing is very close to those minimums. Widening existing on-ramps could be accomplished to add high-occupancy-vehicle lanes, but Caltrans would simply increase the duration of the red lights on the ramp meters. The overall capacity of the flow onto the freeway would not increase.

Response 32-62

The commentor is correct that most trip choices are based on overall travel time and not on economics. It is clear that driving one's automobile and paying for all-day downtown parking is not more economical than taking transit to work, so the final decision of which travel mode to use is based largely on travel time. The 2004 Mobility Element encourages transit use through policies that increase both the frequency and the geographic coverage of transit service in Pasadena. ITS strategies encourage bus priorities, bus queue jump phases, and other improvements that support transit service.

Response 32-63

Reducing the number of transit stops may not offer better service to Pasadena residents and employees. As transit ridership increases, transit loading and unloading times increase because a greater number of people are served at each stop. Southern California transit providers encourage daily and monthly transit passes, and progress is being made toward universal passes that are accepted by all transit providers. The likelihood of having all transit service "pre-purchased" by the 2015 time horizon of this plan update is low. Furthermore, such a policy issue outside of the scope of the EIR.

Response 32-64

The concept of all Pasadena households paying for the transit system would require legislation to impose a transit fee on all residents. The legislation would have to be supported by a transportation impact fee study that establishes a legally defensible nexus between the cost of the service and the amount of benefit derived from the service. This fee, if implemented, would likely have to be at least partially allocated to Pasadena employers as well as residents. This is a policy issue which is outside of the scope of the EIR.

Response 32-65

See Topical Response 10 for a discussion of recirculation of the Draft EIR. As stated in Response 31-45, discussion of future transportation conditions in lane-miles is appropriate at the program level. CEQA does not contain any requirement or directive as to how traffic analysis needs to be performed, and specifically does not state that street segment analysis is required, as mentioned in the comment. The level of analysis and scope of a traffic study are determined by the lead agency and are tailored to the specifics of a project being analyzed. Given that the subject project involves

the entire City of Pasadena, the City's Transportation Department determined that the land-miles approach represents the best method of describing conditions and impacts throughout the City. Intersection analysis was considered appropriate in that area of Pasadena — the Central District — where land use policy directs the most growth, and at those intersections within the Central District anticipated to experience the greatest traffic loads. The City is of the opinion that traffic impacts have been thoroughly examined, and the City has shared all readily available data supporting the analysis and conclusions contained in the EIR.

Response 32-66

The comment does not raise any environmental issues with regard to street furniture; therefore, no response can be provided.

Response 32-67

The Draft EIR describes the impact with regard to stormwater runoff as follows:

> The Central District Specific Plan identifies land use intensities and provides for an increase in both residential and nonresidential development within the planning area. The Central District is highly urbanized, and new development pursuant to implementation of the Specific Plan will consist primarily of infill projects. Thus, a limited increase in the amount of impervious surface area will result, and the amount and speed of stormwater runoff is not expected to exceed the capacity of the stormwater drainage system. All new development pursuant to the Specific Plan will comply with existing federal, State, and local water quality requirements, including NPDES requirements as enforced by the City's Stormwater Management and Discharge Control Ordinance (Draft EIR, p. 167).

In addition, the Draft EIR includes the following mitigation measures:

2. The City will require all development projects to maintain a percentage of the project site as an impervious surface for the purposes of groundwater percolation (Draft EIR, p. 168).

The Draft EIR concludes that impact will be less than significant even with the addition of 2,750 net new residential units and 1.25 million square feet of net new nonresidential development in the Central District.

Response 32-68

The EIR examines future noise levels within the City on a programmatic level appropriate to the analysis of a citywide project (CEQA Guidelines Section 21093.[a]). Individual development projects, including those using exhaust ventilation systems of subterranean parking garages, will be required to analyze the noise and air quality impacts of the development, as well as the other environmental issues prescribed by CEQA, and to mitigate any significant impacts. Also, each individual development project will be required to comply with the City's Noise Ordinance (Chapter 9.36 of the Municipal Code).

Response 32-69

The statement that the City's Water conservation measures are substantially below what could and should be done for the City is not substantiated. The analysis of water use in the EIR is based upon the following threshold to determine level of impact:

- 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 (Draft EIR, p. 163)

The EIR describes the future demand on groundwater supplies as follows:

> The 2004 Land Use Element prescribes targeted growth and sets forth district-wide land use, mobility, and urban design concepts and strategies. With implementation of 2004 land use policy, the City's population is expected to increase by approximately 16,979 persons by the year 2015, to a total of 158,213 persons. New development as a result of the 2004 Land Use Element policy will increase demand for water. The City's Urban Water Management Plan estimates that total system per capita water use (excluding agricultural use) averages 170 gallons per capita per day. Based on this consumption rate, the City is expected to demand 30,128 acre-feet per year (af/yr) in 2015. The *Pasadena 2000 Urban Water Management Plan* estimates a supply of 42,400 af/yr in 2015, as indicated in Table 31. Thus, the projected future water demand as a result of the 2004 Land Use Element will be well within the projected supply reported in the *Pasadena 2000 Urban Water Management Plan* (Draft EIR, pp. 163-164).

The City is already undertaking measures to ensure that local groundwater resources are not depleted by increased demand, as explained in the Draft EIR:

> To avoid groundwater depletion, a major groundwater storage program, the Raymond Basin Conjunctive Use Program, has been under negotiation with the Metropolitan Water District of Southern California (MWD) for several years. This program would allow MWD to build a pipeline and additional pumps and wells for the storage of up to 75,000 acre-feet of imported water in the Basin, with a dry year yield of up to 25,000 af/yr, to meet regional needs. The City maintains a storage account in the Basin to supplement its annual extraction rights. The storage of groundwater from other sources ensures that there is a minimum level of water in the Raymond Basin, and the City's purchase of imported water from MWD will ensure that adequate supply will be available without depleting the City's wells. According to the *Pasadena 2000 Urban Water Management Plan*, the City is currently exploring dry year water transfer options with MWD to ensure adequate supply and prevent groundwater basin depletion (Draft EIR, p. 164).

In addition, the 2004 Land Use Element contains goals and policies to further the City's water conservation activities. However, the EIR finds that these measures can be augmented and requires implementation of the following mitigation measure:

1. The City will continue current conservation efforts and actively pursue water storage and source alternatives, including the following programs:

- Raymond Basin Conjunctive Use Program allows MWD to build a pipeline and additional pumps and wells for the storage of up to 75,000 acre feet of imported water in the basin with a dry year yield of up to 25,000 acre feet per year to meet regional needs
- Dry year water transfer options
- Use and production of reclaimed water, as outlined in its *2000 Urban Water Management Plan* (Draft EIR, p. 164)

As indicated above, the EIR also finds that the City should further its plans to install a reclaimed water system. Programs in place and the mitigation measure stated above reduce impact to a less than significant level.

Response 32-70

The commentor misquotes the EIR. The EIR states:

> Due to the scarcity of available land for purchase by the City for use as public parks, the Central District Specific Plan provides design guidelines for the incorporation of public and private open spaces as the area continues to develop. These spaces are likely to take the form of plazas, courtyards, gardens, and pedestrian passages. The Central District Specific Plan allows the Planning Commission to approve additional floor area (FAR bonus) for projects within the Central District if additional requirements for public amenities, including public outdoor space and pedestrian paths are imposed on the project. The Central District Specific Plan encourages transit villages located in proximity to existing public parks to allow residents to take advantage of both nearby park and transit facilities. The Gold Line light rail will provide residents with increased access to cultural and recreational facilities. Adjacent buildings are encouraged to orient toward and incorporate visual and physical linkages with the parks. As indicated above, public schools have been identified as an opportunity to promote flexible design and shared use of open space resources through the year-round use of school recreational facilities. The Walnut Street Urban Village Precinct has been designated a priority in the development of public park space.
>
> Both the 2004 Land Use Element and Central District Specific Plan identify several strategies to improve recreational facilities and access to them within the City. Implementation of these strategies and payment of the Residential Impact Fee, in combination with the implementation of the Public Open Space Concept and policy initiatives identified in the Central District Specific Plan, will reduce the burden on existing facilities. However, there will remain a parks deficit in the Central District area, as throughout the City, and impact will be significant (Draft EIR, pp. 185-186).

The EIR requires implementation of the following mitigation measures:

> The City will continue to provide and expand its community recreation activities and facilities as needed to support the community as it grows, and the Central District Specific Plan proposes several measures to provide recreational opportunities for its residents. However, land available for parks acquisition is at a minimum, and the City will continue to have a parkland deficit in the future. To increase the City's efforts to provide park facilities to its residents, the following mitigation measure is necessary:
>
> 1. The City will complete a pocket parks acquisition and development study, as discussed in the Central District Specific Plan, for the entire City. This study will determine what options are available to the City to improve park access to its residents, including working with private developers and property owners to provide publicly accessible open spaces as part of new development projects, identifying funding sources, and actively pursuing shared-use facilities with schools.
>
> 2. The City Council will continue to evaluate Pasadena's parks and recreation needs and adjust the Residential Impact Fee as necessary to expand and maintain the City's park system. Part of the evaluation may include establishment of a parklands standard against which the impact of future projects may be assessed (Draft EIR, p. 186).

The decision to change the zoning of parking lots to open space is a policy decision and beyond the scope of this EIR.

Response 32-71

The Threshold Used to Determine Level of Impact with regard to solid waste is stated in the EIR as follows:

> The 2004 Land Use Element, Zoning Code Revisions, and Central District Specific Plan will result in a significant impact if long-term operation will generate solid waste in a quantity that exceeds local and/or regional disposal capacity (Draft EIR, p. 197).

Based on the above threshold, the EIR describes the impact on solid waste generation as follows:

> Implementation of the 2004 Land Use Element and Zoning Code Revisions will result in an increase of development in the City and a related increase in solid waste generation. Based on the California Integrated Waste Management Board's profile for Pasadena, 6.6 pounds of waste are generated per resident per day as of 2000.[9] With an estimated population increase of 16,979 people between 2004 and 2015, the City can be expected to create an additional 112,061 pounds of waste per day, or 20,451 tons per year for a total of 190,568 tons. Non-residential development is anticipated to increase by 4.97 million square feet, with an estimated resulting waste of 3,942.97 tons per year (see Appendix D for calculations). Residential and non-

[9] California Integrated Waste Management Board. *Jurisdiction Profile for City of Pasadena*. www.ciwmb.ca.gov. June 26, 2003.

> residential waste combined is anticipated to be 194,510.97 tons per year. Scholl Canyon Sanitary Landfill, which is expected to close in 2020, has a remaining capacity of 7.9 million tons. Thus, Pasadena's estimated waste generated by the year 2015 is approximately 2.46% of Scholl Canyon's remaining capacity (Draft EIR, p. 197).

Thus, the EIR finds that growth pursuant to the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan, as described Section 2.0 – Project Description, will not exceed local landfill capacity. In addition to the solid waste recycling activities currently required by the City, the EIR requires implementation of additional recycling activities:

1. The City will introduce a program to require multifamily housing developments to provide onsite recyclable materials collection facilities.

2. The City will initiate a public information campaign that encourages commercial establishments, such as restaurants, to use recycled products (i.e., napkins, paper, etc.).

3. The City will prioritize the selection of authorized waste haulers by those that provide recycling services (Draft EIR, p. 198).

In Section 5.0 – Cumulative and Long-Term Effects, the EIR concludes:

> Future development in the City will contribute additional solid waste to the region's already strained solid waste disposal facilities. The California Waste Management Act of 1989 (AB 939) requires all cities to reduce waste within their boundaries through source reduction, recycling, and composting. New development pursuant to the 2004 Land Use Element will be required to comply with the City's solid waste reduction programs. However, since the County of Los Angeles projects a continuing shortage of landfill space, cumulative impact will be significant (Draft EIR, p. 247).

Applicants of individual development projects proposed pursuant to the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan will required to analyze the impacts to utilities and service systems, including solid waste. At such time, the City has the ability to apply mitigation measures specific to a project that can exceed those required to be implemented by this EIR, such as the ones suggested by the commentor.

Response 32-72

The commentor states that the electronic copy of the draft EIR has technical problems on pages ES-32 and ES-33 when using Adobe Acrobat 4.05. The label on the CD that was distributed by the City specifically states that Adobe Acrobat 5.0 is needed to fully view the contents. Adobe Acrobat 5.0 is available free for downloading from the Adobe website (http://www.adobe.com/products/acrobat/readermain.html).

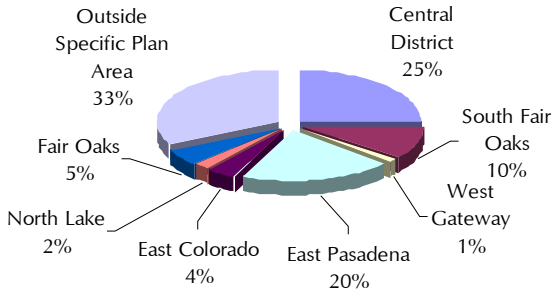
Response 32-73

The commentor states that there is a typing error on page 55 of the Draft EIR regarding the statement that residential development in the Central District will account for approximately 25% of future nonresidential development citywide. There is no typing error; the commentor misunderstands the sentence. The EIR states the following:

> Implementation of the Central District Specific Plan will provide for a net increase in nonresidential development by 1.25 million square feet (Table 5). This represents a 25% increase between baseline year 2004 and horizon year 2015 (see Figure 12). This represents an average annual growth rate within the Central District of 5.7% over the 11-year planning period. Residential development in the Central District will account for approximately 25% of future nonresidential development citywide (Draft EIR, p. 55).

As shown in Figure 11 (page 54 of the Draft EIR and reprinted below), nonresidential square footage within the Central District will be 25% of citywide nonresidential development.

Figure 11
Future Nonresidential Development



Source: City of Pasadena. March 2004.

Response 32-74

See Topical Response 6 for an explanation of the RHNA numbers used in the Draft EIR. The Draft EIR explains that the project will be able to meet the current RHNA average based on the 1999-2005 housing element cycle as follows:

> The provision of new housing opportunities in Pasadena supports SCAG's goals for housing throughout the six-county SCAG region, as identified in SCAG's Regional Housing Needs Assessment (RHNA) model. Analysis of the 2004 Land Use Element anticipates 6,581 net new residential units over the next 11 years, which translates to an average of 598 units per year. The City's 2000-2005 Housing Element indicates a need for an average of 145 units per year very-low-, low-, moderate-, and above-moderate income housing units, or 237 units per year of all income levels of

> housing.[10] However, SCAG does not allocate RHNA numbers based on maintaining an average number for the City, and there is no way of knowing how many housing units Pasadena will be required to identify in the next RHNA cycle. If Pasadena fails to identify the number of RHNA housing sites required by SCAG, the City will not be eligible to receive funding in the future to support affordable housing programs (Final EIR, p. 94).
>
> The 2004 Land Use Element accommodates a variety of housing types in areas most appropriate for residential development in accordance with SCAG's growth rate for the San Gabriel Valley region. 2004 Land use policies, as implemented through the Zoning Code Revisions, provide for affordable and senior housing in excess of SCAG's RHNA standards to continue to foster a balanced community. Furthermore, the 2004 Land Use Element is sensitive to the compatibility of future development in existing residential neighborhoods (Final EIR, p. 95)

Impact of the project will be less than significant. In the analysis of Alternative 5: Commercial-Oriented Alternative, the EIR explains:

> Development would continue to be focused around major transit corridors such as the Gold Line light rail stations and major bus routes. New housing units, both market-rate and affordable, would not be located within the Central District. With a reduction in housing production potential by 2,750 units, all within the Central District, the City would not meet the Regional Housing Needs Assessment for very-low, low-, moderate-, and above-moderate income housing and thus would conflict with State housing law. In addition, the City would fall below SCAG's regional growth population growth projections. Pasadena would generate more jobs than the number of new housing units (Final EIR, p. 230).

The EIR assumes that only 15% of the residential units would be developed as affordable housing units, as is required by the City's inclusionary housing ordinance. Therefore, approximately 987 affordable housing units, which are defined as units affordable to households with incomes between 80 and 120 percent of the County median income, would be developed by horizon year 2015 with the project. With Alternative 5: Commercial-Oriented Alternative, no new residential units would be developed in the Central District and 4,401 results would be developed elsewhere in the City; therefore, approximately 227 fewer affordable units, or 660 total affordable units, would be developed when compared to the project. Because market trends can change, the EIR cannot make the conclusion that 2,750 affordable units could be built in other areas of the City with Alternative 5. Thus, the EIR finds that the land use and planning impacts would be significant with the Commercial-Oriented Alternative (Alternative 5).

Response 32-75

The commentor misunderstands the EIR. The italicized text on pages 11 through 14 and pages ES-5 through ES-9 of the Draft EIR is an excerpt taken directly from the 1994 General Plan and is used only to describe the background of 2004 Land Use Element, Zoning Code Revisions, and Central

[10] City of Pasadena. *2000-2005 Housing Element*. Adopted October 2002.

District Specific Plan. The EIR makes no assertion that all of the rental housing in Pasadena is affordable.

Response 32-76

The commentor may have overlooked the discussion of the Los Angeles County Congestion Management Program in Section 3.2 – Transportation/Traffic (pages 82 to 85 of the Draft EIR). This analysis was provided in the EIR in response to Caltrans' request for average daily traffic volumes and A.M. and P.M. peak-hour volumes as they affect CMP facilities. The EIR states the following:

> ***Freeway Impact Analysis:*** As shown in Table 21, I-210 at Rosemead Boulevard is projected to operate at LOS E in the eastbound direction under *2015 Future Year 2015 Base* with project conditions. Based on application of the CMP significance criteria, the 2004 Land Use and Mobility Elements are projected to have a significant CMP impact at this location because the project will cause deterioration to LOS F in the eastbound direction.
>
> SR-134 at San Rafael Avenue will operate under *Future Year 2015 Base* conditions and *Future Year 2015 with Project* conditions at LOS F in both directions. The project will have a significant CMP impact at this location because the project causes an increase of more than 0.02 in the volume/capacity ratio at this location.
>
> The project will not have a significant CMP impact at I-210 northwest of the SR-134 junction because the freeway will continue to operate at LOS E or better even after the addition of Future Year 2015 with Project traffic.
>
> The 2004 Mobility Element includes transportation system management strategies (TSM) and intersection and corridor operational improvements that are expected to improve conditions within the City. The 2004 Mobility Element also contains Traffic Demand Management (TDM) programs and transit elements that are expected to reduce trip-making within the City, thus reducing impacts at each of the impacted CMP locations. With the project, however, residual impacts are projected to remain in the westbound direction on SR-134 at San Rafael Avenue and eastbound on I-210 at Rosemead Boulevard.

> **~~Arterial~~ CMP Intersection Traffic Impact Analysis**
> The project will not have a significant impact at any of the four CMP arterial locations because the project does not increase the volume-to-capacity ratio of any intersection by 0.02 or more at a location already operating at LOS F, nor does it cause any of the intersections to degrade from LOS D or E to LOS F.
>
> **Conclusion:**
>
> A significant impact will result at SR-134/San Rafael Avenue in both directions and eastbound I-210/Rosemead Boulevard. All other CMP impacts will be less than significant (Final EIR, pp. 83-85).

Response 32-77

The EIR acknowledges the importance of complying with SCAG land use projections in Section 3.3 – Population and Housing. The City is expected to be able to accommodate the approximate future population estimated by SCAG, but is not required to meet the precise amount. The Draft EIR states:

> SCAG estimates that the population within the San Gabriel Valley subregion will increase by 11% between 2000 and 2015.[11] While the City's projected population increase is marginally higher than that projected for the subregion, the average rate of growth is a modest 1.1% per year. This rate reflects a continuation of the existing growth rate patterns of the last three decades and the largely built-out character of Pasadena.
>
> The 2004 Land Use Element is supportive of regional growth management goals and objectives in that the Element will not induce substantial population growth over the next 11 years relative to subregional and regional population projections (Draft EIR, p. 88).

Response 32-78

The EIR describes the impact to scenic vistas and resources citywide as follows:

> The Zoning Code Revisions reflect the policies of the 2004 Land Use Element, including establishment of the Hillside Overlay Districts Ordinance.[12] The purpose of the Hillside Overlay Districts Ordinance is to preserve the City's environmental and scenic resources by encouraging the retention of natural topographic features and vegetation, as well as to encourage structures on hillside parcels to be designed with scale, massing, architectural design and detailing appropriate to maintain the visual character of the City's hillsides as natural open space. The Ordinance accomplishes these goals by limiting the height and density of the structure based on the slope of the proposed site. Furthermore, each structure is limited to locations in the most accessible, least visually prominent, most geologically stable portion or

[11] Letter from Jeffrey M. Smith, AICP, Senior Regional Plan, Intergovernmental Review, Southern California Association of Governments to Joshua Hart, Associate Planner, City of Pasadena. April 15, 2003.
[12] Pasadena Municipal Code Section 17.29 Hillside Overlay Districts.

> portions of the site, and at the lowest feasible elevation. Implementation of the above 2004 Land Use Element policies and the Zoning Code Revisions will work to protect open space areas that create scenic vistas. Impact will be less than significant (Draft EIR, p. 132).

Building heights are of concern within the Central District where the permitted heights are taller than elsewhere in the City. The EIR states:

> With regard to properties governed by the Central District Specific Plan, the Specific Plan includes design guidelines that are applicable to all proposed development in the area to ensure that development will not obscure scenic views. For example, the Public Realm Design Guidelines include the protection of view corridors through the following goals and policies:
>
> CC 4.1 Frame important views of natural and man-made landmarks, and look for opportunities to open new views of landmark buildings and features.
>
> CC 4.2 Discourage developments that obscure existing views along the public right-of-way.
>
> CC 4.3 Prohibit buildings from locating over or across a public street, including buildings constructed as part of a bridge or overpass that crosses a public street.
>
> CC 4.4 Restrict the construction of pedestrian bridges across north-south streets, and discourage their construction along all other streets in the Central District.
>
> CC 4.5 Limit pedestrian bridges to those that are least obtrusive; where provided, they should be of narrow width, open to the sky, and accessible to the public at all times.
>
> Individual development proposals will be required to comply with the above goals and policies to protect scenic viewsheds. Impact will be less than significant with stringent enforcement of the Central District Specific Plan design guidelines (Draft EIR, pp. 135-136).

Response 32-79

In Section 3.6 – Aesthetics of the EIR, one of the Thresholds Used to Determine Level of Impact states that the project will have a significant impact if it will:

- Substantially degrade the existing visual character or quality of the site and its surroundings

The EIR recognizes the City's and residents' concerns regarding protection of existing visual resources, which includes landmark properties and buildings. The EIR describes the impact to visual character as follows:

One of the guiding principles of the 2004 Land Use Element is that "change will be harmonized to preserve Pasadena's historic character and environment." Complementary change requires that new development and other physical alterations respect the existing character and scale of the City. Change and development must be accomplished in a manner that enhances and blends with Pasadena's existing qualities, both physical and social. Therefore, the 2004 Land Use Element contains the following objectives and policies to achieve this principle:

Objective 5 **Character and Scale of Pasadena: Preservation of Pasadena's character and scale, including its traditional urban design form and historic character, shall be given highest priority in the consideration of future development.**

Policy 5.1 Urban Design Principles: Apply citywide urban design principles to complement the scale and quality of the best of our architectural and urban design traditions.

Policy 5.2 Urban Design Guidelines: Adopt urban design guidelines for each targeted development area and/or each identified design district in Pasadena.

Policy 5.3 Character and Identity: Urban design programs, including principles and guidelines, shall reinforce the City's unique character, scale, and identity.

Policy 5.4 Neighborhood Character and Identity: Urban design programs, including principles and guidelines, shall recognize, maintain, and enhance the character and identity of existing residential and commercial neighborhoods.

Policy 5.5 Architectural and Design Excellence: The City shall actively promote architectural and design excellence in buildings, open space, and urban design and shall discourage poor quality development.

Policy 5.6 Human Values: Future development should reflect concern for the well-being of citizens – for workers, visitors, neighbors, and passersby – and should embody the cultural values of the community; it should be accommodating, inspiring, inviting, and enduring.

Policy 5.7 Enhanced Environment: Development should be shaped to improve the environment for the public; it should support the distinctiveness of the locality and region as well as the special characteristics of the existing fabric of the site's immediate surroundings.

Policy 5.8 Imagination and Creativity: Encourage creative responses and solutions at many scales and levels of development on the part of the

various peoples and cultures involved in designing and creating places.

Policy 5.9 Contextual and Compatible Design: Urban design programs shall ensure that new development shall respect Pasadena's heritage by requiring that new development respond to its context and be compatible with the traditions and character of Pasadena, and shall promote orderly development which is compatible with its surrounding scale and which protects the privacy, and access to light and air of surrounding properties.

Policy 5.10 Spatial Attributes: Promote development that creates and enhances positive spatial attributes of major public streets, open spaces, cityscape and mountain sight lines and important "gateways" into the City.

Objective 7 Residential Neighborhoods: Preserve the character and scale of Pasadena's established residential neighborhoods.

Policy 7.1 Mansionization: Ensure that all new development in residential neighborhoods discourages mansionization.[13]

Policy 7.2 Subdivisions: Where subdivisions of existing lots is proposed, provide that the resultant lots in the proposed subdivision are consistent with the prevailing size and character of the lots in the immediate vicinity, and that the subdivision would not have a substantial adverse impact on adjacent residences.

Policy 7.6 Hillsides: In recognition of the special character of the hillsides throughout the City, continue strict protections through city grading and hillside ordinances.

Implementation actions of the 2004 Land Use Element require that buildings and open space shall support the distinctiveness of localities and regions. Each new project must be designed to relate to and support the special characteristics of the existing fabric of the site's immediate surroundings, as well as the larger environment of which they are a part. The Design Commission will be responsible for ensuring that all new development subject to design review conforms to the existing character of the neighborhood in which the proposed site is located.

The Zoning Code Revisions, as the implementing tool of the 2004 Land Use Element, sets guidelines on the kinds of building materials that can be used, window styles, setbacks, lot size, height limits, and maximum density allowances permitted in

[13] Mansionization is building a large stately house to the maximum area and height permitted on the lot. These houses typically take on the appearance of covering the entire lot.

> some sections of Pasadena, such as Bungalow Heaven and Garfield Heights. These guidelines ensure that new development conforms to the existing character of the area. Implementation of the above goals and policies, primarily through application of the Zoning Code Revisions and the design review process, will work to preserve the visual character and quality of Pasadena's districts. Impact will be less than significant (Draft EIR, pp. 133-135).

The 2004 Land Use Element and Zoning Code Revisions have been crafted to protect existing structures while providing for new housing and nonresidential development throughout Pasadena consistent with City objectives.

Response 32-80

The commentor misunderstands the EIR. Section 4.0 – Alternatives to the Project includes a objectives of the project, as follows:

> Full implementation of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan would achieve the following guiding principles of the City:
>
> **2004 Land Use Element**
>
> - Growth will be targeted to serve community need and enhance the quality of life.
> - Change will be harmonized to preserve Pasadena's historic character and environment.
> - Economic vitality will be promoted to provide jobs, services, revenues, and opportunities.
> - Pasadena will be promoted as a healthy family community.
> - Pasadena will be a city where people can circulate without cars.
> - Pasadena will be promoted as a cultural, scientific, corporate, entertainment, and educational center for the region.
> - Community participation will be a permanent part of achieving a greater city.
>
> **2004 Mobility Element**
>
> - Livable and economically strong community will be promoted.
> - Non-auto travel will be encouraged.
> - Neighborhoods will be protected by discouraging traffic from intruding into community neighborhoods.

- ~~Traffic on m~~Multimodal corridors will be managed to promote and improve citywide transportation services.

Central District Specific Plan

- Central District will function as Pasadena's vibrant urban core with a distinctive character.
- Downtown will provide a diversity of economic, residential, and cultural opportunities.
- Downtown will be a place to live, work, shop, and play.
- Downtown will provide a convenient access by foot, bicycle, and transit, as well as by car.
- Physical and economic growth will be harmonized to enhance existing businesses, respect neighborhoods, and respect the numerous resources of historical and cultural significance that contribute to Downtown's unique identity.

The alternatives are tested against the project in terms of the significant environmental effects of the project and the goals of the project. The degree to which the project does or does not achieve the objectives is a policy issue and is outside of the scope of the EIR.

Response 32-81

The EIR makes the following findings about the ability of Alternative 2B: 50% Growth Alternative to meet the objectives of the project:

> The decrease in growth by 50% relative to the proposed project would result in slightly reduced impacts with regard to traffic and air quality. The percent increase in lane-miles citywide and within the Central District operating at LOS E and F would be less than the percent increase associated with the proposed project.
>
> In addition, the 50% Growth Alternative would encourage non-auto travel, protect neighborhoods by discouraging traffic from intruding into community neighborhoods, and manage traffic on multimodal corridors to promote and improve citywide transportation services. Both the 50% Growth Alternative and the project would concentrate development in targeted growth areas, particularly within the Central District where access to transit is greater than the rest of the City and where high-density development is most appropriate. As with the project, all new development projects within Pasadena pursuant to the 50% Growth Alternative would be harmonized to preserve Pasadena's historic character and environment.
>
> However, the 50% Growth Alternative would conflict with SCAG's regional population projections, and the City would have difficulty meeting its Regional

> Housing Needs Assessment for very- low-, low-, moderate-, and above-moderate income housing. Pasadena would not fully achieve its "healthy family community" goals because only half of the projected residential units would be developed under the 50% Growth Alternative and fewer low-income housing units than could be developed pursuant to the 2004 Land Use Element, Zoning Code Revisions, and Central District Specific Plan. Furthermore, Pasadena would not fully promote economic vitality by limiting the amount of development that would occur within the City. The 50% Growth Alternative would not encourage the same level of new jobs, services, revenues, and other opportunities associated with the 2004 Land Use Element (Draft EIR, p. 211).

Based on above reasons, the EIR concludes that Alternative 2B: 50% Growth Alternative would not fully meet the objectives of the project. The commentor's opinion is acknowledged.

Response 32-82

Issue XVII – Mandatory Findings of Significance in Appendix A of the EIR (Initial Study, p. 24) indicates the project will have a potential significant cumulative impact. Section 5.0 – Cumulative and Long-Term Effects of the Draft EIR is devoted to the discussion of the cumulative impacts of the project. Cumulative effects are summarized in the Executive Summary as follows:

> Implementation of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan will result in significant unavoidable project-level and cumulative impacts in the following areas:
>
> - Transportation/traffic
> - Noise
> - Air quality
> - Parks and recreation
> - Solid waste impacts (cumulative only)
>
> Implementation of mitigation measures and land use policies identified in Section 3.0 of this EIR will reduce these impacts to the extent feasible. However, because Pasadena lies within an air basin that is a non-attainment area for State and federal air quality standards, increased emissions will result in a significant impact on regional air quality. Implementation of the recommended circulation system improvements in the 2004 Mobility Element will help reduce traffic impacts; nonetheless, combined with the regional increases in traffic volumes, the project will result in a significant impact. Continued development in the region, combined with an anticipated landfill shortage in Los Angeles County, will result in a significant impact on waste disposal facilities. Future development will generate construction noise from individual development projects that may affect adjoining uses in the short term. Increased traffic noise may have significant impact residences, schools, and hospitals near the freeways in the long term. While policies included in the 2004 Land Use Element will reduce these impacts to the extent possible, the residual impacts will still be significant (Draft EIR, p. ES-41).

All of the issues examined in the EIR are examined in terms of their cumulative impact and only the issues of transportation/traffic, noise, air quality, parks and recreation, and solid waste were found to be cumulatively considerable. Stress, safety hazards on sidewalks, road rage, sprained necks, etc. are not environmental issues and are beyond the scope of the EIR.

Response 32-83

See Topical Response 8 for a discussion of alternatives.

Response 32-84

See Topical Response 8. As discussed in Topical Response 8, CEQA requires that the EIR analyze a range of alternatives that will reduce one or more significant effects of the project:

> The CEQA Guidelines require that a range of alternatives be addressed, "governed by a rule of reason that requires the EIR set forth only those alternatives necessary to permit a reasoned choice" (Section 15126[f]). The CEQA Guidelines state that the discussion of alternatives must focus on options capable of either eliminating any significant environmental effects of the project or reducing them to a less than significant level, while achieving most of the major project objectives. According to the analysis presented in the prior sections, adoption of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan will result in unavoidable significant impacts with regard to transportation/traffic, air quality, noise, and parks/recreation. Impacts of the 2004 Land Use Element, Zoning Code Revisions, and Central District Specific Plan will result in a significant light and glare impact that will be reduced to a less than significant level with implementation of mitigation. ~~According to the analysis presented in the prior sections, adoption of the 2004 Land Use Element and Zoning Code Revisions will result in unavoidable significant impacts with regard to transportation/traffic, air quality, noise, and parks/recreation. Impacts of the 2004 Land Use Element and Zoning Code Revisions will result in a significant light and glare impact that will be reduced to a less than significant level with implementation of mitigation. The 2004 Mobility Element will result in unavoidable significant impacts with regard to transportation/traffic, air quality, and noise. The Central District Specific Plan will result in unavoidable significant impacts with regard to transportation/traffic, air quality, and parks/recreation. Implementation of mitigation will reduce the light and glare impact of the Central District Specific Plan to a less than significant level.~~
>
> In addition to focusing on alternatives capable of either eliminating any significant environmental effects of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan or reducing them to a less than significant level, the following analysis also examines variations of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan considered during preparation of these plans and that may be considered further during the public hearing process (Final EIR, p. 205).

The commentor's suggested maximum mitigation alternative is acknowledged; however, most of the maximum mitigation described ascribes new policies, which is beyond the scope of the EIR.

Response 32-85

See Topical Response 9 for a discussion of the land use assumptions in the EIR. The issue of whether or not the City should remove the development caps of the 1994 General Plan is a policy issue and is outside of the scope of the EIR.

Response 32-86

The Threshold Used to Determine Level of Impact for emergency services is as follows:

> Implementation of the 2004 Land Use and Mobility Elements, Zoning Code Revisions, and Central District Specific Plan will result in a significant impact if the provision of new or physically altered government facilities will be necessary to maintain acceptable emergency service levels, the construction of which will result in substantial adverse physical impacts (Draft EIR, p. 170).

The threshold refers to the physical alteration existing facilities or construction of new facilities, the construction of which will result in adverse physical impacts. As described in the EIR:

> Development pursuant to the 2004 Land Use Element and Zoning Code Revisions will increase the demand for police protection services, including the demand for additional personnel. However, according the Police Department's Administrative Services Office, the Department does not expect the need to construct a new police satellite station as a result of the expected increase in population over the next 11 years.[14] The Police Department may place some units that do not experience a high level of public interaction, such as the narcotics unit, in "off-site" offices. These off-site units may be located in offices leased from existing commercial buildings, to avoid construction of new facilities. The City will continue to evaluate the need for additional personnel and offices to serve additional development and population growth anticipated as a result of 2004 Land Use Element. Adverse environmental effects due to the construction of new police facilities will not occur, and impact will be less than significant. However, mitigation measures are recommended to ensure that future development pursuant to 2004 Land Use Element policy does not burden existing police resources.
>
> Consistent with current practice, all individual development projects will be reviewed by the Police Department to identify and remedy potential risks to public safety. Further more, all development projects will be subject to standard predevelopment plan review by several City departments to ensure compliance with City, State, and federal laws. In addition to the Fire Department, the Building Division reviews proposed project plans for safety measures and collects a development fee that is based on the square footage and type of construction valuation (Draft EIR, pp. 171-172).

In addition, the EIR provides the following mitigation measures:

[14] Sergeant Kevin Hall, Administrative Services. Pasadena Police Department. April 2004.

1. As part of the annual budgeting process, the City will assess the need for additional sworn and non-sworn police officers and fire personnel to provide protection services consistent with established City service levels and commensurate with the increase in population.

2. All new development will be evaluated on a project-specific basis to determine whether any unusual need exists for specialized law enforcement and/or fire protection services. Such needs will be funded by developers of such projects.

3. Ingress, egress, and roadways constructed or improved pursuant to the 2004 Mobility Element shall be designed in compliance with Pasadena Fire Department access requirements (Draft EIR, p. 174).

According to the Police Department, the existing facility in the Central District will not need to be expanded or additional facilities constructed elsewhere in order to accommodate the growth projected in the EIR.

Response 32-87

The commentor asks for an analysis of projected growth needs for an extended period of time beyond horizon year 2015. Section 5.0 – Cumulative Impacts addresses the long-term impacts of the project to the year 2025. See Response 31-82. Environmental analysis based on population data beyond 2025 cannot be guaranteed and is beyond the scope of this EIR.

Response 32-88

The commentor's opinion that the City Council not rush the process is acknowledged.

Response 32-89

The Threshold Used to Determine Level of Impact to schools is as follows:

> Implementation of the 2004 Land Use Element, the Zoning Code Revisions, and Central District Specific Plan will have in a significant impact on schools if the generation of new students results in the need for development of new or expanded school facilities, the construction of which could result in potentially significant physical impacts to the environment (Draft EIR, 176).

As described in the EIR:

> New development pursuant to the 2004 Land Use Element and Zoning Code Revisions will add 6,581 new residential units and approximately 16,980 new residents by the year 2015. Using the average citywide generation factor of 0.4 students per dwelling unit, new development could result in an additional 2,632 additional students.[15] The estimated additional students represent approximately

[15] Pasadena Unified School District, as cited in the East Colorado Specific Plan. 2004.

> 11% of the Pasadena Unified School District's current enrollment and is within the District's total current capacity.
>
> While the City acknowledges that new development will increase demand on school facilities, the City is precluded by Senate Bill 50 (SB 50, also known as Proposition 1A, codified in Government Code Section 65995) from considering this a significant impact for the purposes of CEQA (Draft EIR, p. 176).

SB 50 precludes the City from finding this a significant impact.

Response 32-90

The commentor is referring to the Civic Center Plan, the EIR for which is currently available for public review and comment at the Department of Planning. This project is outside of the scope of the EIR.

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Cotton/Bridges/Associates

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