6.0 OTHER ENVIRONMENTAL CONSIDERATIONS

A. SIGNIFICANT IRREVERSIBLE CHANGES

According to Section 15126.2(c) of the *CEQA Guidelines*, an EIR is required to evaluate significant irreversible environmental changes that would be caused by implementation of the proposed Project. As stated in CEQA Guidelines Section 15126.2(c):

> *"[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."*

A power generation plant by its nature would consume limited, slowly renewable, and non-renewable resources. This consumption would occur during the construction phase of the project and would continue throughout its operational lifetime. Project operation would require a commitment of resources that would include: (1) the consumption of natural gas for the purposes of power generation, (2) building materials, (3) fuel and operational materials/resources, and (4) the transportation of goods and people to and from the project site. Construction of the proposed project would require the consumption of resources that are non-replenishable or may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Furthermore, nonrenewable fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the project site.

Project operation would continue to expend nonrenewable resources that are currently consumed within the City of Pasadena and at the Pasadena Water and Power (PWP) Plant. These include non-renewable fossil fuels such as natural gas, petroleum-based fuels required for vehicle-trips, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the project, and the existing, finite supplies of these natural resources would be incrementally reduced. Thus, the energy requirements associated with the project would still represent a long-term commitment of essentially nonrenewable resources. Of note is that the renovation of the Glenarm building to accommodate the control room as proposed under the project, would be required to achieve at least a "Silver" rating from the US Green Building Council's LEED® green building program, thus reducing the use of non-renewable resources in this portion of the facility.

Overall, continued use of such resources would be on a relatively small scale and consistent with state and local goals for reductions in the consumption of such resources, including AB 32. Further, the proposed project would reduce the City's purchase of power from its entitlement of coal-fired power from the Intermountain Power Project facility. In this way, the local generation of power using natural gas would

contribute directly to a reduction in the City's use of remote, coal-fired power generation sources. Moreover, the project would not affect access to existing resources, nor interfere with the production or delivery of such resources.

B. GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the *CEQA Guidelines* requires that an EIR analyze growth-inducing impacts of a project. Growth-inducing impacts are characteristics of a project that could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the area surrounding a project site. Impacts associated with the removal of obstacles to growth as well as the development of facilities that encourage and facilitate growth are considered to be growth-inducing. However, as stated in the CEQA Guidelines, it is not to be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

With respect to economic growth, the proposed project would replace existing obsolete equipment with more efficient equipment. Accordingly, the project would not increase the number of employees on site, which totals 36 workers. Further, the proposed project does not include the development of residential dwelling units. Therefore, the proposed project would not directly or indirectly result in the construction of additional housing.

With respect to the removal of obstacles to growth, development of the proposed project would occur entirely within the existing PWP property. The project site is currently developed and is located in an area where adequate infrastructure is in place to serve the existing demand. While utility lines would need to be relocated to serve the proposed project, these improvements would be sized to accommodate only the proposed project and would not promote additional future growth. Further, the Implementation of the proposed project will require the installation of additional water supply infrastructure at the site. As with the improvements to the utility lines, these improvements would be designed and sized only to accommodate the proposed project and would not promote future growth. Therefore, these improvements are not considered growth-inducing.

C. EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the *CEQA Guidelines* states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the proposed Project and is included in **Appendix A** of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each topical area is or is not analyzed further in the Draft EIR. A summary of the Initial Study determinations is provided below.

1. Agriculture and Forest Resources

The City of Pasadena is a developed urban area surrounded by hillsides to the north and northwest. The City contains no prime farmland, unique farmland, or farmland of statewide importance, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Further, the City of Pasadena has no Williamson Act contract land and has no land zoned for agricultural use other than commercial nurseries/growing areas. Moreover, The City of Pasadena has no timberland or Timberland Production land and has no land zoned for forest land. Although the City's Green Space,

Recreation and Parks Element (2007) identifies areas of "Wild Open Space" and "Undeveloped Lands" within the City, the South Fair Oaks Specific Plan area and project site are located in an established, urbanized part of the City. Therefore, the proposed project would have no impact on agricultural and forest resources.

2. Biological Resources

The Glenarm site and Broadway site have been developed as power plants for over 100 years and 50 years, respectively. As such, the project site is located in an established, urbanized area. No candidate, sensitive, or special status species identified by the California Department of Fish and Game (CDFG) or the U.S. Fish and Wildlife Service (USFWS) in local or regional plans, policies, or regulations are present on or near the project site. On-site flora consists predominantly of non-native species that are primarily located in the northwestern corner of the site (i.e., landscaping surrounding the Glenarm Building's electric fountain), on the western project site perimeter along Fair Oaks Avenue, and along State Street. No riparian or other sensitive natural community exists on the project site or in the immediate vicinity. Additionally, no discernible drainage courses, inundated areas, wetland vegetation, or hydric soils exist on the site or adjacent properties. No wildlife corridors or native wildlife nursery sites are present on or adjacent to the site. Furthermore, because of the urbanized nature of the project area, the potential for native resident or migratory wildlife species movement through the site is very low. No trees would be removed from the Glenarm site as a result of the project. Lastly, there are no adopted Habitat Conservation or Natural Community Conservation Plans within the City of Pasadena or in the project vicinity. Therefore, the proposed project would have no impact to biological resources.

3. Cultural Resources (Archaeological and Paleontological Resources)

With respect to archaeological resources, the project site has been in continuous use as a power plant for over a century and has been periodically subject to construction-related disturbance. The City's General Plan EIR determined that infill development in already developed areas of the City is generally not anticipated to result in the uncovering of additional resources. Although the potential to encounter archaeological or Native American resources is considered remote, mitigation measures were identified in the Initial Study prepared for the proposed project to reduce impacts to a less than significant level in the unlikely event resources are encountered during project implementation. That mitigation is as follows:

Mitigation Measure 7.a: If archaeological resources are encountered during project implementation, an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards (the "archaeologist") shall be immediately notified and retained by the applicant and approved by the City to oversee and carry out these mitigation measures.

The archaeologist shall coordinate with the applicant as to the immediate treatment of the find until a proper site visit and evaluation is made by the archaeologist. The archaeologist shall be allowed to temporarily divert or redirect grading or excavation activities in the vicinity in order to make an evaluation of the find and determine appropriate treatment. Treatment will include the goals of preservation where practicable and public interpretation of historic and archaeological resources. All cultural resources recovered shall be documented on California Department of Parks and Recreation Site Forms to be filed with the CHRIS-SCCIC. The archaeologist shall prepare a final report about the find to be filed with Project Applicant, the City, and the CHRIS-SCCIC, as required by the California Office of Historic Preservation. The report shall

include documentation and interpretation of resources recovered. Interpretation will include full evaluation of the eligibility with respect to the National and California Register and CEQA. The report shall also include all specialists' reports as appendices. The Lead Agency shall designate repositories in the event that significant resources are recovered. The archaeologist shall also determine the need for archaeological and Native American monitoring for any ground-disturbing activities thereafter.

If warranted, the archaeologist will develop a monitoring program in coordination with a Native American representative (if there is potential to encounter prehistoric or Native American resources), the applicant, and the City. The monitoring program will also include a treatment plan for any additional resources encountered and a final report on findings.

With respect to paleontological resources, this part of the City does not contain any unique geologic features and is not known or expected to contain paleontological resources. Based on a recent paleontological records search conducted for the area, including the project site, this area sits atop younger Quaternary deposits that typically do not contain significant vertebrate fossils in the uppermost layer. While underlying older Quaternary deposits may contain significant vertebrate fossils, excavation is only proposed to a depth of five feet as part of the project. Therefore, construction of the project is considered to have low potential to result in significant impacts associated with the permanent loss of, or loss of access to, a paleontological resource. Nonetheless, mitigation was identified in the Initial Study prepared for the proposed project to reduce impacts to a less than significant level in the unlikely event that paleontological resources are encountered during project implementation. That mitigation is as follows:

Mitigation Measure 7.b: A qualified paleontologist shall attend a pre-grade meeting and develop a paleontological monitoring program to cover excavations in the event they occur into the older Quaternary Alluvium. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. If excavation into Quaternary deposits occurs, monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. If it is determined that excavation will not encounter Quaternary deposits, no further measures need be taken. The frequency of monitoring inspections shall be based on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered.

If a fossil is found, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage. At the paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository. Any fossils collected shall be donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository.

If fossils are found following completion of the above tasks, the paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the

methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the applicant to the lead agency, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

4. Energy

The proposed project is intended to support attainment of policy objectives and benchmarks established in the Integrated Resources Plan (IRP). The IRP proposes to reconfigure PWP's existing electricity portfolio and significantly reduce greenhouse gas emissions over the next 20 years. Furthermore, the proposed project is consistent with the adopted 1983 General Plan Energy Element. The administrative/control room and maintenance building proposed within the Glenarm Building would comply with the energy standards contained in the California Energy Code, Part 6 of the California Building Standards Code (Title 24). Project features and practices intended to meet these performance standards may include high-efficiency Heating, Ventilation, and Air Conditioning (HVAC) and hot water storage tank equipment, lighting conservation features, higher than required rated insulation, and double-glazed windows. Furthermore, the project would comply with the California Green Building Code Standards as amended by the City of Pasadena (PMC Section 14.04.500-578). Therefore, no impacts related to conflict with adopted energy conservation plans are anticipated.

5. Geology and Soils

The project site is not located within an identified potential fault rupture zone. The closest mapped fault zone, the Raymond (Hill) Fault, is approximately one-half mile south of the project site. Nonetheless, the project site is located in a seismically active area that would be subject to ground shaking, similar to most of Southern California. The earthquake-resistant design and materials utilized in new projects must meet or exceed the current seismic engineering standards of the California Uniform Building Code (UBC) Seismic Zone 4 requirements. PWP is required to submit a soils report to the Building Division for review and approval and must also submit project plans for review and approval, showing compliance with seismic engineering standards, including a grading plan prior to beginning of construction. With conformance with these standards and requirements, impacts with respect to fault rupture would be less than significant.

Liquefaction generally occurs in saturated, loose to medium dense, granular soils and in saturated, soft to moderately firm silts when spaces between individual particles are completely filled with water following strong seismic shaking. Due to the low groundwater level and the generally dense to very dense, Pleistocene age granular deposits encountered below the project site, the potential for soil liquefaction at the site is considered to be very low. Therefore, impacts regarding liquefaction would be less than significant.

The project site is relatively flat, does not contain any slopes, and is not within a Landslide Hazard Zone. Thus, the project would have no impacts related to seismically- induced landslides. With respect to substantial soil erosion or the loss of topsoil, compliance with the applicable local regulations regarding dust control and erosion would ensure that impacts regarding soil erosion or the loss of topsoil are less than significant.

With respect to expansive soils, standard construction practices pursuant to the City of Pasadena and/or California UBC building requirements would ensure that project implementation would result in less than significant impacts associated with expansive soils, and substantial risks to life or property are not anticipated.

6. Hydrology and Water Quality

Construction and operation of the proposed project would occur in accordance with all applicable regulations pertaining to water quality standards or waste discharge requirements, including, but not limited to: Section 303 of the Clean Water Act, the Los Angeles Regional Water Quality Control Board (LARWQCB) Stormwater Quality Management Plan (SQMP) (which ensures compliance with the National pollutant Discharge Elimination System Permit [NPDES]), and the County-wide MS4. Further, the power plant currently operates under a General Industrial Activities Storm Water Discharge Permit. Since the proposed project would not introduce any new uses or operations that would require a new permit or modifications to the existing permits, no new SUSMP is required. The existing SUSMP BMPs currently implemented at the Power Plant would continue to be implemented. Lastly, the PWP has already prepared and implements a Storm Water Pollution Prevention Plan (SWPPP) for the existing facility, which would be updated to reflect the proposed project. For these reasons, impacts related to compliance with applicable water quality standards and waste discharge requirements would be less than significant.

With respect to existing drainage patterns and the potential for the project to generate stormwater pollutants, the project site is currently developed with buildings, power generation facilities, hardscape including paved parking, the Glenarm Building's decorative plaza and electric fountain, and ornamental landscaping. Development of the site would not substantially alter stormwater and dry weather runoff drainage patterns on-site or in the surrounding area and runoff would continue to be conveyed to the City's storm drain system. The required approval of a site drainage plan by the Building Division and the Public Works Department ensures that the proposed drainage plan is appropriately designed and that the proposed runoff does not exceed the capacity of the City's storm drain system. For these reasons, the proposed project would not result in significant erosion or siltation impacts stemming from changes to drainage patterns. Further, complying with the City's SUSMP and incorporating existing BMPs into construction and operation of the proposed combined-cycle power generating would ensure that the proposed project would not result in significant erosion or siltation impacts as the result of changes in drainage patterns, as well as ensuring that stormwater pollutants from the operation of the combined-cycle power generating unit would not substantially degrade water quality. The project, however, also has the potential to generate short-term water pollutants during construction, including sediment, trash, construction materials, and equipment fluids. However, the project is required to comply with these applicable regulatory requirements, and therefore construction is anticipated to result in less than significant water quality impacts.

With respect to floodplains, no portions of the City of Pasadena are within a 100-year floodplain identified by the Federal Emergency Management Agency (FEMA) and the project does not propose any housing. In addition, according to the City's Dam Failure Inundation Map (Plate P-2, of the adopted 2002 Safety Element of the City's General Plan) the project is not located in a dam inundation area. Moreover, the City of Pasadena is not located near enough to any inland bodies of water or the Pacific Ocean to be inundated by either a seiche or tsunami. Lastly, the site and surrounding area is flat and is not located in an area of potential mudflow. Therefore, no impacts related to the placement of housing or other development within a 100-year

flood hazard area, the potential for inundation from a dam failure or seiche, or the potential for mudflows would occur.

7. Mineral Resources

The City's 2004 General Plan Land Use Element does not identify any mineral recovery sites within the City. Furthermore, there are no mineral-resource recovery sites shown in the Hahamongna Watershed Park Master Plan or the 1999 "Aggregate Resources in the Los Angeles Metropolitan Area" map published by the California Department of Conservation, Division of Mines and Geology. No active mining operations exist in the City of Pasadena and mining is not currently allowed within any of the City's designated land uses. There are two areas in Pasadena that may contain mineral resources. These two areas are Eaton Wash, which was formerly mined for sand and gravel, and Devils Gate Reservoir, which was formerly mined for cement concrete aggregate. The project is not near these areas. Therefore, the proposed project would result in no impacts to mineral resources.

8. Population and Housing

The proposed project would replace existing obsolete equipment with more efficient equipment but would not increase Power Plant production and capacity. Accordingly, the project would not increase the number of employees on-site, which currently totals 36 workers. The project site does not contain any existing dwelling units. Therefore, implementation of the project would have a less than significant impact with respect to population growth, either directly or indirectly, and would not displace residents or require replacement housing.

9. Public Services

With respect to fire protection services, the project site is located in an established urbanized area that carries a low fire hazard designation, according to the General Plan Safety Element (Plate P-2). The project site is currently served by Fire Station No. 31, located approximately one mile north of the project site at 135 South Fair Oaks Avenue. Water for fire suppression is provided by existing connections to the City of Pasadena water lines. Fire protection and detection systems are currently provided throughout the Glenarm site, including the maintenance building. The existing fire water system would be connected to the new combined-cycle power unit (Unit GT-5) and the new offices within the Glenarm Building. Although City pressure to meet fire flow requirements is normally adequate for the fire system, as a backup system, a fire pump fed from the existing fire water tank would be utilized to maintain fire flow to the fire header, if needed. The new Unit GT-5 would also be equipped with its own CO2 fire suppression system to allow the operators to know if there is a fire emerging in the gas turbine enclosure. Therefore, adequate fire protection would be available to serve the project, and meet the demands for fire protection services. Thus, impacts associated with fire protection would be less than significant.

With respect to police protection services, project improvements would not result in a change in operations or an increase in the number of employees. The Pasadena Police Department would review the project plans prior to issuance of a building permit to ensure consistency with applicable police-related design standards. Furthermore, the proposed site is not located in a high crime rate area according to Police Department burglary statistics. As such, the demand on police protection services would remain similar to existing conditions and impacts would be less than significant.

The proposed project would not induce population growth or require new employees. As a result, the proposed project would not increase the demand for schools, or for park and library services.

10. Recreation

As discussed above, the project would not induce population growth nor result in an increase in the number of employees. As such, the project would not result in increase in the demand for neighborhood and regional parks or other recreational facilities. The project would be located at an established Power Plant facility with no physical effect on nearby parks or other recreational opportunities. Additionally, the project would not necessitate the construction or expansion of recreational facilities because there would not be any direct or indirect increase in residential population or in the number of employees on site. Thus, no impacts would occur to recreation facilities.

11. Transportation/Traffic

The proposed project would not increase the number of employees on the project site, and therefore no increase in employee-related vehicle trips would occur. In addition, the number of truck deliveries during project operation would be similar to existing site conditions. Therefore, the project would have no impact on an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of a circulation system during operation.

Project construction would result in a temporary increase in traffic that could affect the performance of the surrounding street system as a result of construction worker trips, as well as haul truck and delivery trips. In addition, relocation of utility lines may result in temporary lane closures on Fair Oaks Avenue, Raymond Avenue, and Glenarm Street. In order to minimize disruption and inconvenience to area residents and motorists during project construction, PWP would prepare a Construction Staging and Traffic Management Plan as required by the City of Pasadena Department of Transportation. The Construction Staging and Traffic Management Plan would include such provisions as: limiting construction-related trips and lane closures to off-peak traffic hours, limiting haul trucks to City-designated truck routes, prohibiting construction workers to park on adjacent streets, and staging construction equipment on-site. With approval and implementation of this required Plan, impacts of construction-related project traffic on the surrounding street system would be less than significant. Construction activities would not impact the operation of the Metro Gold Line, which separates PWP's Glenarm and Broadway sites.

Four intersections in the City of Pasadena are included in the Congestion Management Program (CMP) monitoring locations. These four intersections include Arroyo Parkway and California Boulevard, Pasadena Avenue and California Boulevard, Saint John Avenue and California Boulevard, and Rosemead Boulevard and Foothill Boulevard. CMP mainline monitoring stations are also located along Freeway Route 110 at Pasadena Avenue, Freeway Route 134 west of San Rafael Avenue, Freeway Route 210 west of Freeway Routes 134 and 710, and Freeway Route 210 at Rosemead Boulevard. The first three intersections are located one mile north of the project site. Since construction workers and delivery traffic will be required to arrive and depart the project site outside of the morning and afternoon peak periods, the proposed project is not expected to add 50 or more trips at the monitoring intersections, or 150 or more trips at the mainline monitoring locations. As such, the project would have a less than significant impact on CMP standards during construction.

The project site is not located within the vicinity of a public or private airport. The nearest public use airport is the Burbank Airport located in the City of Burbank. Furthermore, the new combined-cycle power generating unit and associated equipment (including the 125-foot stacks) would be similar in height to the existing facilities on the Glenarm site. As such, the project would not result in a change in air traffic patterns, including either an increase in traffic levels, or a change in location that would result in substantial safety risks and no impact would occur.

With respect to hazardous design features, the combined-cycle power generating unit and related equipment would include minor internal roadway improvements. No alterations to public streets are proposed, other than the vacation of State Street, and employee access to the project site would be provided from the existing driveway on Glenarm Street (Gate 4) and a new driveway off Fair Oaks at the location of the vacated State Street. Two gated emergency access driveways off Fair Oaks, north and south of proposed Unit GT-5, would also be provided. The project would not increase hazards as the result of a design feature or incompatible uses and no related impacts are anticipated. Further, the project must comply with all Building, Fire and Safety Codes and plans are subject to review and approval by the Public Works and the Transportation Departments, and the Building Division and Fire Department. Therefore, impacts related to emergency access would be less than significant.

With respect to parking, parking on the project site is currently provided in a 1.5-acre City-owned surface parking lot on PWP's adjacent Broadway site, and there are also several small surface lots for PWP employee parking throughout the Glenarm site. Under the proposed project, a new parking area is proposed south of Unit GT-5 that would provide 45 surface parking spaces for PWP employees, and surface parking for 14 vehicles would be provided on the parcel south of State Street, adjacent to the proposed maintenance shops. The project proposes to upgrade existing equipment and would not result in an increase in the number of employees on-site. Therefore, the proposed parking supply would increase the on-site parking supply for existing employees and eliminate the need to share parking. There is no specified parking requirement for the project site; the parking supply is determined by the existing CUP. The proposed parking increase would therefore be considered as part of the CUP sought to allow the proposed equipment upgrade. Impacts related to parking would therefore be less than significant.

D. SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the *CEQA Guidelines* requires an EIR to describe significant environmental impacts that cannot be avoided and impacts that can be mitigated but not reduced to a less than significant level. The following is a summary of impacts associated with the proposed project that were concluded to be significant and unavoidable. The following impacts are described in detail in **Section IV,** *Environmental Impact Analysis***,** of this Draft EIR.

Greenhouse Gases: As analyzed in **Section 4.D,** *Greenhouse Gas Emissions*, the increase in greenhouse gas (GHG) emissions would exceed the South Coast Air Quality Management District's (SCAQMD) mass emission thresholds during construction and operation, resulting in significant and unavoidable project impacts as well as a cumulatively considerable contribution to cumulatively significant impacts. Proposed Unit GT-5 is a combined-cycle natural gas fueled power generation unit, which meets the state's EPS and is the best technology available as an alternative to coal-fired power generation. The local generation of power using natural gas by Unit GT-5 would meet implement the City's *Integrated Resources Plan* (*IRP)* policies by contributing directly to a reduction in the City's use of remote, coal-fired power generation sources, and by

replacing obsolete, inefficient equipment with a reliable and efficient local natural gas-fired, combined-cycle generating unit equipped with a state-of-the art air pollution control system. There are no feasible mitigation measures available to reduce turbine emissions beyond those anticipated based on the project design. Even though emissions from the turbine will meet Emission Performance Standards requirements and would produce less GHGs per megawatt of energy generated, operational emissions from the Glenarm Repowering Project would result significant and unavoidable impacts due to increased use (i.e., number of operating hours) of the new Unit GT-5 over existing Unit B-3 operations. Please refer to **Section 4.D,** *Greenhouse Gas Emissions*, of this Draft EIR for a detailed discussion of this topic.

Land Use and Planning: As analyzed in **Section 4.F,** *Land Use and Planning*, the 125-foot stack associated with proposed Unit GT-5 would exceed the maximum 56-foot height limit for the project site under existing zoning, and the proposed employee parking lot south of the Glenarm Building would conflict with the South Fair Oaks Specific Plan development standards requiring the placement of parking lots between the main building and the rear property line for new development on Fair Oaks Avenue, or along the property line perpendicular to Fair Oaks Avenue. Although this is the case, no mitigation measures are feasible to reduce the significant impacts associated with the 125-foot stack and the proposed employee parking lot to less than significant levels, and therefore impacts would remain significant and unavoidable. Please refer to **Section 4.F, Land Use and Planning**, of this Draft EIR for a detailed discussion of this topic

E. REASONS WHY THE PROJECT IS BEING PROPOSED, NOTWITHSTANDING SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the *CEQA Guidelines* requires a description of the reasons why the Project is being proposed, notwithstanding significant unavoidable impacts associated with the Project. The reasons why this Project has been proposed are grounded in a comprehensive listing of Project objectives included in Section II, Project Description, of this Draft EIR. The underlying purpose of the proposed Project is to enhance the future economic growth and vitality of the Specific Plan area through the development of an urban office building that would encourage growth in new technology-based industries. Furthermore, the Project would redevelop an underutilized site containing several deteriorating, single-story structures with a modern mid-rise office building. To increase walkability and transit opportunities, the contemporary building design would incorporate pedestrian friendly and community enhancing features such as a landscaped plaza at the intersection of California Boulevard and Fair Oaks Avenue and parkway improvements along the Project's street frontage.

The project's purpose and objectives are included in **Section II,** *Project Description*, of this Draft EIR. The project's underlying purpose is to support and implement the City of Pasadena's Integrated Resources Plan (IRP) that serves as blueprint for PWP to provide customers with a more reliable, environmentally responsible electric service, competitive rates, and energy independence over the next two decades. Other objectives of the proposed project include: controlling emissions from the City's power plant facilities, with a goal of significantly reducing greenhouse gas emissions over the next 20 years; and replacing obsolete equipment to attain high energy efficiency in the operation of the existing facilities.

As noted above, the significant unavoidable impacts associated with the project include greenhouse gas emissions and land use and planning impacts. Several alternatives to the proposed project were considered in **Section 5.0,** *Alternatives*, of this Draft EIR. Among those alternatives, no feasible alternative was identified that would eliminate the significant unavoidable construction effects of the proposed project (see

Section D above). The alternatives analysis indicated that even limiting the new Unit GT-5 to 4,380 hours per year (equivalent to 50 percent of the total possible operational hours in a year) under a Reduced Operations Alternative (Alternative 2) would result in significant and unavoidable impacts with respect to GHG emissions. In addition, the Reduced Operations Alternative would result in a loss of operational flexibility and reliability. While the electricity needs of PWP's customers vary on a day-to-day and seasonal basis, it is likely that under Alternative 2, PWP would import more power, including potentially more coal-generated power, compared to the proposed Project. In addition, since the No Project Alternative would not meet any of the underlying objectives of the project, it is not considered a feasible development alternative.

F. POTENTIAL SECONDARY EFFECTS

Section 15126.4(a)(1)(D) of the CEQA Guidelines requires mitigation measures to be discussed in less detail than the significant effects of the proposed Project if the mitigation measure(s) cause one or more significant effects in addition to those that would be caused by the proposed Project. In accordance with the CEQA Guidelines, proposed Project mitigation measures that could cause potential impacts were evaluated. The following provides a discussion of the potential secondary effects that could occur as a result of implementing Project mitigation measures.

1. Aesthetics

Impacts regarding Aesthetics are less than significant and no mitigation measures are required. Therefore, no secondary impacts would occur due to the implementation of mitigation measures for this environmental topic.

2. Air Quality

Impacts regarding Air Quality are less than significant and no mitigation measures are required. Therefore, no secondary impacts would occur due to the implementation of mitigation measures for this environmental topic.

3. Cultural Resources

Mitigation Measure CULT-1 establishes protection for cultural resources through a Historic American Buildings Survey (HABS) Level III recordation to document the boilers, infrastructure, and hallway created by the boilers prior to their removal. Mitigation Measure CULT-2 required an interpretive exhibit displaying the original layout and operation of the floor-to-ceiling hallway to be constructed in the location of the existing character-defining hallway. Mitigation Measure CULT-3 requires that the proposed project be designed to avoid the potential for damage to historic fabric and features. These mitigation measures assure that resources would be treated consistent with CEQA guidelines and the regulatory provisions for the protection of resources. They would require no new construction, and would have no impact on the environment. Mitigation Measures CULT-4 and CULT-5 require compliance with the City's standard protocols in the event of the unexpected discovery of archaeological or paleontological resources during construction, and would not have an adverse impact on the environment.

4. Greenhouse Gases

Operational GHG emissions from the Glenarm Repowering Project exceed the SCAQMD's mass emission thresholds. Although this is a potentially significant impact, the proposed project meets the State's Emission Performance Standards and is the best available technology as an alternative to coal-fired power generation. Therefore, no mitigation measures are proposed and the proposed could cause significant and unavoidable impacts due to increased use of the new Unit GT-5 over existing Unit B-3 operations. Since no mitigation measures are required, no secondary impacts would occur due to the implementation of mitigation measures for this environmental topic.

5. Hazards

Mitigation Measures HAZ-1 and HAZ-2 are intended to protect construction workers and the public from exposure to hazardous materials that may be present in the existing structures. Mitigation Measures HAZ-3, HAZ-4, and HAZ-5 identify remediation processes for potentially contaminated on-site soils. These activities would be carried out prior to and throughout construction activities, as applicable, and would not require substantial efforts to achieve relative to the overall project construction activities. In accordance with applicable Federal, State, and local regulations, the excavation, removal, and or transportation of such materials would be conducted in compliance with applicable regulations by licensed and trained personnel with experience in handling such materials as part of the overall demolition and preparation activities and therefore would not result in adverse secondary effects.

6. Land Use and Planning

Although the 125-foot stack associated with proposed Unit GT-5 would exceed the maximum 56-foot height limit for the project site under existing zoning, and the proposed employee parking lot south of the Glenarm Building would conflict with the South Fair Oaks Specific Plan development standards, no mitigation measures are feasible to reduce these significant impacts. Therefore, no secondary impacts would occur due to the implementation of mitigation measures for this environmental topic.

7. Noise

Impacts regarding Noise are less than significant and no mitigation measures are required. Therefore, no secondary impacts would occur due to the implementation of mitigation measures for this environmental topic.

8. Water Supply

Impacts regarding Water Supply are less than significant and no mitigation measures are required. Therefore, no secondary impacts would occur due to the implementation of mitigation measures for this environmental topic.