V. Alternatives

V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is… to identify alternatives to the project."

Direction regarding the consideration and discussion of project alternatives in an EIR is provided in CEQA Guidelines Section 15126.6 as follows:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible.*

The CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." The CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

> *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations,*

jurisdictional boundaries […], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site […]

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a "no project" alternative and CEQA Guidelines Section 15126.6(f) requires an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR is required to identify an environmentally superior alternative among the other alternatives.

2. Objectives of the Proposed Project

Section III, Project Description, of this Draft EIR sets forth the following list of Project Objectives for the proposed Project:

- To create an urban campus for the City of Pasadena by transforming a suburban style campus defined by centralized buildings and large expanses of surface parking to a pedestrian-oriented development with a mix of uses.
- Increase patronage for Old Pasadena businesses by increasing on-site employment and introducing permanent residents to the Project Site.
- Stem the loss of existing large companies and employers that leave the City by increasing the inventory of Class "A" office space, particularly within the Central District.
- Develop sufficient Class "A" office space at the Project Site to attract new companies to the City, particularly in the technology, creative office, and other growth sectors as they emerge.
- To facilitate travel across the Project Site by improving and extending Holly Street as a traffic and pedestrian corridor connecting Fair Oaks Avenue to Pasadena Avenue.
- To restore Holly Street in accordance with the intent of the original Bennett Plan by visually linking City Hall to the proposed Project.[1]

[1] *The Bennett Plan was published in 1925 and included architectural concepts and strategies that included a grand civic center Beaux-Arts Axial plan and ceremonial western entrance, a formal arrangement of civic buildings; an overall plan for the extension, widening, and landscaping of key axial streets and boulevards, and an implementing zoning ordinance. Currently, the most visible portion of the Bennett Plan is the Civic Center, a collection of ten historic buildings, a park and several newer compatible developments.*

- To establish an urban design framework for the Project Site that responds to on-site conditions and creates a positive interface with the surrounding community.
- To integrate the existing Parsons buildings into a larger revitalized urban fabric.
- To expand upon the adjacent mixed use fabric of the City.
- To develop open space systems that support an environmentally integrated development, e.g., building orientations that promote the use of passive solar systems.
- To create linkages between the Project Site and Old Pasadena.
- To implement a Project design that responds to the local climate and weather through the use of passive design strategies (e.g., building orientation, exterior shading, daylighting, and natural ventilation).
- To create a pedestrian oriented environment defined by a hierarchy of public spaces and pathways.
- To create new buildings and open spaces that are compatible with the rich architectural history found in Old Pasadena and the existing Parsons building.

3. Overview of Alternatives to the Project

The intent of the alternatives analysis is to reduce the significant impacts of a project. Implementation of the Project would result in significant and unavoidable impacts on an individual and cumulative basis with regard to: traffic conditions at the intersection of Fair Oaks Avenue/Walnut Street and regional air quality emissions during construction and operation. In addition, cumulative construction noise impacts would result from on-site construction equipment in the event that Project construction occurs concurrently with the construction of the related projects that are located in close proximity to the Project Site. Based on the significant environmental impacts of the Project and the above-listed objectives established for the Project, and the feasibility of the alternatives considered, the following alternatives to the Project are evaluated in this section:

- **Alternative 1: No Project Alternative (Continuation of Existing On-Site Use)**

In accordance with the CEQA Guidelines, the No Project Alternative for a development project consists of the circumstance under which a proposed Project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states that “in certain instances, the No Project Alternative means ‘no build’ wherein the existing environmental setting is maintained.” The purpose of examining such an alternative is to allow decision makers to compare the effects of approving the Project with the effects of not approving the

Project. Accordingly, for purposes of this analysis, Alternative 1, the No Project—Continuation of Existing On-Site Use Alternative assumes the Project would not be approved, no new permanent development would be introduced within the Project Site, and the existing environment would be maintained.

- **Alternative 2: Reduced Density Alternative (33 percent reduction**)

The Reduced Density Alternative would reduce the density of the development that would otherwise be constructed under the proposed Project. Nonetheless, the Reduced Density Alternative would still redevelop the Project Site and substantially increase on-site development and activity with mixed uses. Under the proposed Project, 475 residential units, 620,000 square feet of office uses, and 10,000 square feet of restaurant floor area would be developed. Under the Reduced Density Alternative, development would decrease by 33 percent, resulting in a development program consisting of 318 residential units, 415,400 square feet of office uses, and 6,700 square feet of restaurant floor area. While development would be reduced, this reduction would occur via a reduction of building heights as opposed to a reduction in building footprints. Thus, the extent of site coverage under Alternative 2, including landscaping and open space, would remain the same as the proposed Project. The subterranean parking structure would also be constructed under the Reduced Density Alternative including replacement parking for the existing surface parking lots, although a commensurate reduction in parking spaces is expected due to reduced project development. Similar to the proposed Project, the Reduced Density Alternative includes improving and extending Holly Street as a traffic and pedestrian corridor connecting Fair Oaks Avenue to Pasadena Avenue. Additionally, streetscape improvements would be constructed along Holly Street and Leonard J. Pieroni Street, between the new on-site segment of Holly Street and Union Street.

- **Alternative 3: Alternative Land Use (All residential)**

The Alternative Land Use Alternative assumes that residential units, including work/live units along Fair Oaks Avenue, would replace the proposed commercial office uses on the Project Site. Alternative 3 would develop the Project Site with 1,396 residential units.[2] The 10,000 square feet of restaurant floor area proposed as part of the Project would remain under this alternative. Landscaping and open space would be modified to

[2] *The 1,396 residential units that would be provided under the Alternative Land Use Alternative was determined by dividing the Project's proposed commercial office square footage (620,000 square feet) by the average residential unit size under the Project (673 square feet), and adding that number (921 units) to the proposed 475 residential units.*

provide for a mostly residential community. Additionally, the number of parking spaces in the subterranean parking garage would be modified and provided according to the number of proposed residential units, restaurant space, and replacement parking to support the existing on-site commercial uses. Similar to the proposed Project, Alternative 3 includes improving and extending Holly Street as a traffic and pedestrian corridor connecting Fair Oaks Avenue to Pasadena Avenue. In addition, streetscape improvements would be constructed along Holly Street and Leonard J. Pieroni Street, between the new on-site segment of Holly Street and Union Street.

- **Alternative 4: Alternative Design (Flip Residential/Commercial Land Uses on Fair Oaks Avenue)**

Under Alternative 4, the development proposed within Development Areas A and B would be reversed so that the 210,000 square feet of commercial office uses and 10,000 square feet of restaurant floor area would be located on the south end of the Project Site along Fair Oaks Avenue and Holly Street and the 475 residential units would be located on the north end of the Project Site along Fair Oaks Avenue and Walnut Street. Although the location of these uses would be reversed, the square footage and the number of residential units would remain the same as under the proposed Project. Development Area C would remain unchanged with 410,000 square feet of office uses, of which up to 30,000 square feet could be developed with ancillary retail uses. Additionally, landscaping, open space, parking, and circulation would remain the same as under the proposed Project. Similar to the proposed Project, Alternative 4 includes improving and extending Holly Street as a traffic and pedestrian corridor connecting Fair Oaks Avenue to Pasadena Avenue. In addition, streetscape improvements would be constructed along Holly Street and Leonard J. Pieroni Street, between the new on-site segment of Holly Street and Union Street.

- **Alternative 5: Alternative Design (Vertical Mixed-Use)**

Alternative 5 assumes that development proposed within Development Area B would consist of office uses only. The 10,000 square feet of restaurant uses proposed for Development Area B would be relocated to the street front along Fair Oaks Avenue within Development Area A. Thus, the restaurant uses would replace the work/live units and residential amenity area fronting Fair Oaks Avenue in Development Area A. Under Alternative 5, Development Area B would consist of the development of 210,000 square feet of office uses. While these changes would occur in Development Areas A and B, Alternative 5 would still include 475 residential units, but work/live units would not be included as part of this alternative. Development Area C would remain unchanged with 410,000 square feet of office uses, of which up to 30,000 square feet could be developed with ancillary retail uses. Additionally, landscaping, open space, parking, and circulation would remain the same as under the proposed Project. Similar to the proposed Project, Alternative 5 includes improving and extending Holly Street as a traffic and pedestrian

corridor connecting Fair Oaks Avenue to Pasadena Avenue. In addition, streetscape improvements would be constructed along Holly Street and Leonard J. Pieroni Street, between the new on-site segment of Holly Street and Union Street.

Each of these five alternatives is evaluated in detail later on in this section of the Draft EIR. A summary comparison of the proposed Project and the five alternatives is provided in Table V-1 on page V-7.

4. Alternatives Considered and Rejected

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration is the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Project that have been considered and rejected as infeasible include:

Development under Existing Zoning: Development consistent with the Project Site's existing zoning was considered, but ultimately rejected, as an alternative. If developed under the Project Site's existing zoning, this alternative would construct approximately 1,292,301 square feet of new development, which is approximately 100,000 square feet, or approximately 8.5 percent, more than the proposed Project. This increased development would result in greater impacts with regard to traffic, air quality, climate change, noise, and public services. Therefore, this alternative would run counter to CEQA's stated purpose for an alternatives analysis which is to reduce the significant impacts of the Project. As such, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

- **Reduced Density (10, 20, 25, and 50 percent reduction):** When considering alternatives for the Project, the City evaluated a wide range of density reductions for the Project, including reductions of 10, 20, 25, 33, and 50 percent. During the evaluation, it was determined that a reduction of 33 percent was found to be appropriate for further analysis. Reductions between 10 and 25 percent were determined to not be large enough to reduce impacts associated with development of the proposed Project and a reduction of 50 percent would not create a Project that responds to the scale of available development area on the Project Site and, thus, would not fully achieve the Project's objectives. As such, in accordance with Section 15126.6(f) of the State CEQA Guidelines, analyzing reduced density alternatives, other than a 33 percent reduction in development, were rejected from further consideration.

Table V-1
Summary Comparison of the Project and Alternatives

Land Use	Proposed Project	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Commercial						
Office	620,000 sf	--	415,400 sf	--	620,000 sf	620,000 sf
Restaurant	10,000 sf	--	6,700 sf	10,000 sf	10,000 sf	10,000 sf
Subtotal – Commercial	*630,000 sf*	*--*	*422,100 sf*	*10,000 sf*	*630,000 sf*	*630,000 sf*
Residential						
Units	475	--	318	1,396	475	475

Source: Matrix Environmental, 2014.

- **Alternative Land Use (All Commercial):** An Alternative Land Use Alternative, which consisted of developing the Project Site entirely with commercial uses, was considered but ultimately rejected. The development of the Project Site with commercial uses would result in an increase in the intensity of on-site development and the amount of traffic traveling to and from the Project Site. This increase would result in greater impacts with regard to traffic, noise, air quality, and greenhouse gases. In addition, one of the basic objectives of the proposed Project is to increase the diversity of land uses in the Central District by creating a pedestrian-oriented, high-density development with a mix of uses. Development of only commercial uses would continue the existing trend of only commercial development within the Project Site and would not introduce any residential uses into the vicinity of the Project Site. Thus, development of an all commercial development would not reduce impacts or be consistent with the Project's objectives. Therefore, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

- **Alternative Design (Flip development east-west):** This Alternative Design Alternative, which was ultimately rejected, considered the relocation of the proposed Project's land uses. Under this alternative, residential and commercial land uses would be located on the west side of the development and commercial uses would be located on the east side along Fair Oaks Avenue. This alternative was ultimately rejected because it would have placed residential units on the west side of the Project Site closer to the freeway, which would have resulted in greater air quality–related impacts. In addition, this alternative would eliminate the mixed-use identity, which was encouraged in the Project's objectives, of the Project along Fair Oaks Avenue since only commercial uses would exist in this area under this alternative. Furthermore, one of the main objectives of the Project is to create a place where residents can circulate with reduced dependence on cars. As such, the relocation of residential uses to the west side of the Project Site would increase the distance between the residents and the

Metro Gold Line adjacent to Memorial Park. Thus, this alternative would potentially conflict with this basic Project objective. As this is not a viable alternative, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

- **Alternative Site:** The Lead Agency initially considered, but ultimately rejected as infeasible, the development of the proposed Project at an Alternative Site. Under this alternative, the proposed Project would be constructed on an alternate site within the City of Pasadena. While development of the proposed Project on an alternative site was considered, this alternative was rejected because of a lack of available properties within the Central District that could accommodate the proposed Project. In addition, the Project Applicant owns the Project Site and does not own or control other property of a comparable size in the Central District or elsewhere in the City of Pasadena, nor is it reasonable to assume that a property of the same size would become available for the Project Applicant to acquire. The objectives of the Project are closely tied to the concept of providing a pedestrian-oriented, high-density development with a mix of uses in the Central District that reduces residents' dependence on cars. No other site of this size in the City of Pasadena is located as centrally and as close to public transportation as the Project Site. Additionally, a basic and fundamental objective of the proposed Project is to redevelop the existing Project Site and weave the site back into the surrounding historic and mixed-use community of Old Pasadena. Thus, if the Project was located outside of the Central District in another part of Pasadena, a basic project objective could not be met under this alternative. As such, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

5. Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project objectives identified in Section III, Project Description, of this Draft EIR would be mostly attained by the alternative.[3]

The Draft EIR analyzes Project conditions based on Phase 1 and Phase 2 development as well as development at Project buildout. These analyses have been conducted relative to an environmental baseline of conditions as of the issuance of the Project's Notice of Preparation (2013) as well as in the case of traffic and traffic-related analyses (e.g., air quality and noise), future conditions which correspond to completion of

[3] *CEQA Guidelines Section 15126.6(c).*

Phase 1 (2016) and Phase 2 (2020) of the Project. The Project's impacts that form the bases of comparison in the alternatives analysis are those impacts which represent a conservative assessment of Project impacts (e.g., analyzing traffic conditions at Project buildout in 2020).

The evaluation of each of the alternatives follows the process described below:

a. The net environmental impacts of the alternative after implementation of reasonable mitigation measures are determined for each environmental issue area analyzed in this Draft EIR.

b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue area as follows:

   - Less: Where the impact of the alternative after feasible mitigation would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be "less."

   - Greater: Where the alternative's impact after feasible mitigation would be clearly more adverse or less beneficial than the impact of the Project, the comparative impact is said to be "greater."

   - Similar: Where the impacts of the alternative after feasible mitigation and the Project would be roughly equivalent, the comparative impact is said to be "similar."

c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose for the Project, as well as the Project's basic objectives would be substantially attained by the alternative.

Table V-2 on page V-10 provides a summary matrix that compares the impacts of the proposed Project with the impacts of each of the alternatives analyzed.

Table V-2
Project and Alternatives Impact Comparison Summary

Environmental Issue	Project Impact	Alternative 1 No Project	Alternative 2 Reduced Density	Alternative 3 Alternative Land Use	Alternative 4 Alternative Design (Flip Residential/ Commercial Land Uses on Fair Oaks Avenue)	Alternative 5 Alternative Design (Vertical/Mixed-Use)
A. LAND USE						
Land Use Consistency	Less than Significant	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Land Use Compatibility	Less than Significant	Greater (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
B. TRANSPORTATION						
Construction	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Regional Transportation System	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Intersection Level of Service	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Less than Significant with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Similar (Significant and Unavoidable with Mitigation)
Street Segments	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Similar (Significant and Unavoidable with Mitigation)	Similar (Significant and Unavoidable with Mitigation)
Congestion Management Plan	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
C. PARKING						
Parking	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
D. AESTHETICS, VISUAL CHARACTER, AND VIEWS						
Visual Character						
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Views						
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
E. LIGHT/GLARE AND SHADING						
			Light/Glare			
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)

Table V-2 (Continued)
Project and Alternatives Impact Comparison Summary

Environmental Issue	Project Impact	Alternative 1 No Project	Alternative 2 Reduced Density	Alternative 3 Alternative Land Use	Alternative 4 Alternative Design (Flip Residential/ Commercial Land Uses on Fair Oaks Avenue)	Alternative 5 Alternative Design (Vertical/Mixed-Use)
Shading	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
F. CULTURAL RESOURCES						
Historic Resources	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Archaeological Resources	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Paleontological Resources	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
G. AIR QUALITY						
Construction						
Regional Emissions	Significant and Unavoidable with Mitigation	Less (No Impact)	Similar (Significant and Unavoidable with Mitigation)	Similar (Significant and Unavoidable with Mitigation)	Similar (Significant and Unavoidable with Mitigation)	Similar (Significant and Unavoidable with Mitigation)
Localized Emissions	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Operations						
Regional Emissions	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Localized Emissions	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Toxic Air Contaminants						
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)
Odors (Construction and Operations)	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
H. CLIMATE CHANGE						
Greenhouse Gas Emissions	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)

Table V-2 (Continued)
Project and Alternatives Impact Comparison Summary

Environmental Issue	Project Impact	Alternative 1 No Project	Alternative 2 Reduced Density	Alternative 3 Alternative Land Use	Alternative 4 Alternative Design (Flip Residential/ Commercial Land Uses on Fair Oaks Avenue)	Alternative 5 Alternative Design (Vertical/Mixed-Use)
I. NOISE AND VIBRATION						
Construction						
Noise	Significant and Unavoidable (Cumulative Only)	Less (No Impact)	Less (Significant and Unavoidable – Cumulative Only)	Similar (Significant and Unavoidable – Cumulative Only))	Similar (Significant and Unavoidable – Cumulative Only))	Similar (Significant and Unavoidable – Cumulative Only))
Vibration	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operational Noise	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
J. HYDROLOGY						
Surface Water Hydrology	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Surface Water Quality	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Groundwater Hydrology	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Groundwater Quality	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
K. HAZARDOUS MATERIALS						
Construction	Less than Significant with mitigation	Less (No Impact)	Less (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)
Operation	Less than Significant with mitigation	Less (No Impact)	Less (Less than Significant with mitigation)	Less (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)
L. PUBLIC SERVICES						
Police Protection						
Construction	Less than Significant with mitigation	Less (No Impact)	Less (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)
Operation	Less than Significant with mitigation	Less (No Impact)	Less (Less than Significant with mitigation)	Greater (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)
Fire Protection						
Construction	Less than Significant with mitigation	Less (No Impact)	Less (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)

Table V-2 (Continued)
Project and Alternatives Impact Comparison Summary

Environmental Issue	Project Impact	Alternative 1 No Project	Alternative 2 Reduced Density	Alternative 3 Alternative Land Use	Alternative 4 Alternative Design (Flip Residential/ Commercial Land Uses on Fair Oaks Avenue)	Alternative 5 Alternative Design (Vertical/Mixed-Use)
Operation	Less than Significant with mitigation	Less (No Impact)	Less (Less than Significant with mitigation)	Greater (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)
Schools	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Parks and Recreation						
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Libraries						
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
M. UTILITIES						
Water Supply						
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Sewer						
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Solid Waste						
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
N. Energy						
Construction	Less than Significant with mitigation	Less (No Impact)	Less (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)
Operation	Less than Significant with mitigation	Less (No Impact)	Less (Less than Significant with mitigation)	Less (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)	Similar (Less than Significant with mitigation)

Source: Matrix Environmental, 2014.

V. Alternatives

A. Alternative 1: No Project—Continuation of Existing On-Site Use

1. Environmental Impact Analysis

a. Land Use

(1) Land Use Consistency

No new development would be introduced to the Project Site under Alternative 1, and the Project Site would remain in its existing condition. Therefore, Alternative 1 would not implement the planning concept set forth in the Central District Specific Plan for the Northwest Gateway/Parsons Precinct of the Old Pasadena Sub-district. This planning concept explicitly envisions mixed-use infill development within the Project Site's expansive surface parking lots in order to establish a more urban character appropriate to the Sub-district. Alternative 1 also would not implement the numerous land use goals and policies in the General Plan Land Use Element and Central District Specific Plan related to enhancing pedestrian-friendly environments and creating urban street fronts. Additionally, to the extent that Alternative 1 results in the development of housing elsewhere to meet the housing demands of the City and region, this Alternative may also conflict with goals and policies in local and regional land use plans related to focusing development within Pasadena's urban core, away from surrounding residential neighborhoods, and in proximity to public transit. Therefore, impacts with regard to land use consistency would be less than significant but greater than those of the Project.

(2) Land Use Compatibility

Currently, the Project Site is an anomaly within the land use development pattern and character of the Central District. The dominant features within the North Development Area are the 12-story Parsons Tower and 4-story pod buildings surrounded on all sides by expansive surface parking lots. The prominent surface parking areas, isolated interior building placement, and lack of pedestrian-accommodating features substantially contrast with the traditional urban street pattern of buildings located east and south of the Project Site in Old Pasadena. Unlike the Project, Alternative 1 would not improve existing on-site conditions to more closely resemble surrounding patterns of development by introducing pedestrian-friendly spaces, a varied mix of land uses, and an activated urban street front.

Therefore, impacts with regard to land use compatibility would be less than significant but greater than those of the Project.

b. Transportation

No new uses or activities would be introduced to the Project Site under the No Project Alternative. Therefore, Alternative 1 would not generate any new traffic on the surrounding street network. Furthermore, no changes to Project Site's access, circulation, or parking supply would occur. Therefore, no significant impacts would occur with respect to freeways, intersection levels of service, street segments, Congestion Management Plan facilities (including monitoring stations and transit), or during Project construction. Thus, Alternative 1 would result in less than significant impacts with regard to transportation and would eliminate the Project's significant impact to intersection LOS conditions at the intersection of Fair Oaks Avenue and Walnut Street.

c. Parking

Under the No Project Alternative, no new uses or activities would be introduced to the Project Site and existing conditions would remain the same. As such, existing parking facilities would remain and no changes would occur. Therefore, the No Project Alternative would avoid the less than significant parking impact associated with the proposed Project.

d. Aesthetics, Visual Character, and Views

Given that no new permanent development would occur under the No Project Alternative, no permanent impacts to the aesthetics or visual quality of the Project Site would occur, nor would existing views of or across the Project Site be altered. The Project Site would remain unchanged from existing conditions, and as a result, no visual resources located either on- or off-site would be affected, and views of such resources would not be impacted. Therefore, while the Project benefit of improved streetscapes along the on-site segment of future Holly Street and Leonard J. Pieroni Street would not occur under this alternative, there would be no impacts under Alternative 1, compared to the less than significant impacts of the proposed Project.

e. Light/Glare and Shading

(1) Light/Glare

The No Project Alternative would maintain existing conditions and would result in no changes to the existing light and glare levels on the Project Site and surrounding area. This alternative would avoid the less than significant construction and operational impacts

from light and glare, which are associated with the proposed Project. Thus, impacts with regard to light/glare and shading would be less under the No Project Alternative compared to the less than significant impacts under the proposed Project.

(2) Shading

The No Project Alternative would maintain existing conditions on the Project Site and would result in no changes to the existing shading levels on the Project Site and surrounding area. This alternative would avoid the less than significant construction and operational impacts from shading, which are associated with the proposed Project.

f. Cultural Resources

(1) Historic Resources

As with the proposed Project, no impacts to on-site historic resources would occur under Alternative 1 because there are no historically significant buildings, structures, objects, or sites located within the Project Site. With regard to off-site historic resources, the Project Site is located just outside of the Old Pasadena Historic District, which is bordered by Union Street and Fair Oaks Avenue just south and east of the Project Site. Adjacent historical resources include contributing buildings to the Old Pasadena Historic District located south of the Project Site along Union Street and east of the Project Site along Fair Oaks Avenue. No new permanent development would be introduced to the Project Site under Alternative 1. Therefore, Alternative 1 would not have the potential to alter the immediate surroundings of historic resources in the vicinity of the Project Site, and the integrity of the Old Pasadena Historic District would not be impaired. No impacts to historic resources would occur, and impacts would be less than the less than significant impacts of the proposed Project.

(2) Archaeological and Paleontological Resources

Under Alternative 1, no grading or other earthwork activities would take place. As such, this alternative would not have the potential to uncover subsurface archaeological and paleontological resources. Consequently, this alternative would avoid the potentially significant but mitigable impacts to archaeological and paleontological resources identified for the proposed Project. Furthermore, the No Project Alternative would not disturb any unknown human remains that may be present in the Project area. Given that this alternative would avoid ground disturbance, there would be no impacts to unknown resources below the ground surface, and impacts would be less than the less than significant impacts of the proposed Project.

g. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

Under the No Project Alternative, no construction activities would occur on-site. Therefore, this alternative would not result in any substantial construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, and the on-site use of heavy-duty construction equipment. As such, the No Project Alternative would eliminate the significant and unavoidable regional impacts and the less than significant impacts associated with localized emissions that would occur with development of the proposed Project. Therefore, no construction-related air quality impacts would occur under this alternative, and impacts would be less than those of the proposed Project.

(b) Toxic Air Contaminants

Alternative 1 also would not result in diesel particulate emissions from the operation of construction-related equipment that could generate substantial toxic air contaminants. Therefore, the No Project Alternative would reduce the less than significant impacts associated with the potential for toxic air contaminants that would occur with development of the proposed Project. As such, no impacts associated with the release of toxic air contaminants would occur under this alternative, and such impacts would be less than those of the proposed Project.

(c) Odors

Given that no construction-related activities would occur, Alternative 1 would not have the potential to produce any substantial odors associated with construction activities. Therefore, the No Project Alternative would eliminate the less than significant impacts associated with odors that would occur with development of the proposed Project. Thus, no impacts associated with odors would occur under Alternative 1, and such impacts would be less than those of the proposed Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

As Alternative 1 would not result in new development or increased operations on-site, no new operational emissions related to vehicular traffic or the consumption of natural gas would occur. Therefore, the No Project Alternative would eliminate the significant impacts associated with regional emissions and the less than significant impacts

associated with localized emissions that would occur with the proposed Project. Thus, no operational air quality impacts would occur. Such impacts would be less than those of the proposed Project.

(b) Toxic Air Contaminants

The primary sources of potential air toxics associated with proposed Project operations would include diesel particulate matter from delivery trucks and emergency backup generators, and to a lesser extent, natural gas equipment such as a boiler. As the No Project Alternative would not result in new development or increased operations on-site, no new operational diesel particulate matter emissions associated with increased deliveries or from a new backup generator would occur. Therefore, this alternative would eliminate the less than significant toxic air contaminants impacts of the proposed Project. As no operational impacts associated with toxic air contaminants would occur under the No Project Alternative, impacts would be reduced compared to the proposed Project.

(c) Odors

As no development would occur under the No Project Alternative, this alternative, as with the proposed Project, this alternative would not include any uses identified by the South Coast Air Quality Management District's (SCAQMD) CEQA Handbook as being associated with odor complaints. Thus, while the proposed Project would result in less than significant impacts associated with odors, such impacts would be eliminated under this alternative as no uses would be developed which could increase the potential for the creation of objectionable odors.

h. Climate Change

As there would be no new development or operations on-site, no direct increase in greenhouse gas (GHG) emissions would occur. Thus, while the proposed Project would result in less than significant impacts associated with global climate change, such impacts would be reduced under the No Project Alternative as no new uses would be developed which could increase the potential for GHG emissions.

i. Noise and Vibration

(1) Construction

Under the No Project Alternative, existing conditions would remain the same and no construction activities would take place. As such, no impacts with regard to construction noise and vibration would occur and the No Project Alternative would avoid the Project's cumulative significant and unavoidable construction noise impact. As such, construction

noise and vibration impacts under the No Project Alternative would be less than those of the proposed Project.

(2) Operation

Given that existing conditions would remain the same, the No Project Alternative would not introduce new on-site noise sources and would not result in an increase in off-site auto traffic. Accordingly, no new or increased sources of noise within the vicinity of the Project would occur as a result of Alternative 1. Therefore, Alternative 1 would be less than the less than significant operational noise impacts identified for the proposed Project.

j. Hydrology

(1) Surface Water Hydrology

No new construction, earthwork, ground-disturbing, or demolition activities would occur under Alternative 1. Therefore, the configuration of existing buildings, surface parking lots, and landscaping would not be altered. As such, no impacts to existing surface water hydrology would occur during construction or operation under Alternative 1, and impacts on the local storm drain system would be less than that forecasted to occur under the Project. As such, impacts would be less than the less than significant impacts identified for the Project.

(2) Surface Water Quality

No new earthwork or ground-disturbing activities would occur under Alternative 1, nor would any new development or uses be introduced to the Project Site. Therefore, no changes to existing on-site operations would occur under Alternative 1 and new pollutant sources would not be introduced to the Project Site. No construction-related or operational impacts to surface water quality would occur under Alternative 1 and impacts would be less than the less than significant impacts identified for the Project. However, the benefits of implementing surface water quality best management practices (BMPs) at the Project Site would not occur under Alternative 1.

(3) Groundwater Hydrology

No new earthwork or ground-disturbing activities would occur under Alternative 1. Therefore, there would be no potential to encounter groundwater beneath the Project Site. Thus, no impacts to groundwater hydrology would occur during construction or operation under Alternative 1 and impacts would be less than the less than significant impacts identified for the Project.

(4) Groundwater Quality

No new earthwork or ground-disturbing activities would occur under Alternative 1. Therefore, there would be no potential to encounter groundwater beneath the Project Site. No impacts to groundwater quality would occur during construction or operation under Alternative 1 and impacts would be less than the less than significant impacts identified for the Project.

k. Hazards and Hazardous Materials

No new construction, earthwork, or ground-disturbing activities would occur under Alternative 1. Therefore, there would be no potential for new or additional transport, use, or storage of hazardous materials; new or additional generation, handling, or disposal of hazardous waste; or disturbance of asbestos containing materials (ACM), lead-based paint (LBP), or polychlorinated biphenyls (PCBs) during construction. In addition, there would be no impacts related to the implementation of any adopted on-site emergency response or evacuation plans. Furthermore, Alternative 1 would not increase the level of human activity on the Project Site, and no changes to existing operations would occur. Therefore, no impacts to hazards and hazardous materials would occur under Alternative 1 and impacts would be less than the less than significant impacts identified for the Project.

l. Public Services

(1) Police Protection

Under Alternative 1, existing land uses and site operations would remain unchanged. Accordingly, the No Project Alternative would not increase the daytime service population on-site or have the potential to increase calls for police protection services from the Pasadena Police Department. Therefore, no impacts to police protection services would occur, and impacts would be less than the less than significant impacts of the Project.

(2) Fire Protection

(a) Construction

No construction activities would occur under Alternative 1. Therefore, there would be no potential for accidental on-site fires during construction, for construction traffic to affect emergency vehicle response times, or for construction to impact the delivery of emergency services to the Project Site. As such, Alternative 1 would not affect fire fighting and emergency services, as there would not be a need for any additional new or expanded fire facilities, in order to maintain acceptable service ratios, response times, or other

performance objectives of the Pasadena Fire Department (PFD). Finally, there would be no potential for increasing the demand for duties performed by fire inspectors. Therefore, no impacts to fire protection would occur during construction of Alternative 1 and impacts would be less than the less than significant impacts identified for the Project.

(b) Operation

No new uses or permanent residents would be introduced to the Project Site under Alternative 1. Therefore, Alternative 1 would not increase the service population for the PFD stations that serve the Project Site or increase the level of activity on the Project Site. As such, Alternative 1 would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain PFD service levels. Therefore, no operational impacts to fire protection services would occur under Alternative 1 and impacts would be less than the less than significant impacts with mitigation identified for the Project.

(3) Schools

The No Project Alternative would not result in an increase in population associated with new residential and commercial development on the Project Site. As such, there would not be an increase in students attending nearby schools. Therefore, no impacts to school services would occur and impacts would be less than the less than significant impacts identified for the proposed Project.

(4) Parks and Recreation

Under the No Project Alternative, no construction activities would occur and, thus, there would be no potential for a temporary increase in local park use by construction workers. Additionally, no new residential or commercial uses would be developed and, consequently, there would not be a resulting increase in population. Thus, there would not be an increase in demand for parks and recreational facilities in the Project area. Therefore, no impacts to parks and recreational facilities would occur and impacts would be less than the less than significant impacts identified for the proposed Project.

(5) Libraries

No construction activities would occur under Alternative 1. Therefore, there would be no potential for construction workers to utilize local libraries. Furthermore, under Alternative 1, no new uses or permanent residents would be introduced to the Project Site and the existing population in the vicinity of the Project Site would remain the same. Thus, Alternative 1 would not result in an increase in demand for library services. Accordingly, the No Project Alternative would not exceed the capacity of local libraries to adequately

serve the community and there would be no impact on library facilities. In addition, impacts would be less than the less than significant impacts identified for the proposed Project.

m. Utilities

(1) Water Supply

No construction activities would occur under Alternative 1. As such, there would be no potential for Alternative 1 to generate a limited and temporary water demand during construction. Therefore, no impacts during construction to water supply and infrastructure would occur under Alternative 1 and impacts would be less than the less than significant impacts with the Project.

No new uses or permanent residents would be introduced to the Project Site under Alternative 1. As such, there would be no potential for Alternative 1 to exceed the available water supplies projected by Pasadena Water and Power (PWP). In addition, there would be no potential for Alternative 1 to affect the water distribution network. Therefore, no impacts to water supply and infrastructure would occur under Alternative 1 and impacts would be less than the less than significant impacts with the Project.

(2) Sewer

No construction activities would occur under Alternative 1. As such, there would be no potential for Alternative 1 to result in a temporary increase in sewage generation as a result of construction workers on-site. Therefore, no impacts to the sewer system would occur under Alternative 1 and impacts would be less than the less than significant impacts identified for the Project.

No new commercial uses or permanent residents would be introduced to the Project Site under Alternative 1. As such, there would be no potential for Alternative 1 to affect sewer infrastructure. In addition, there would be no potential for Alternative 1 to exceed the combined available capacity for future development at the Whittier Narrows Water Reclamation Plant (WRP) and the Los Coyotes WRP. Therefore, no impacts to sewage generation, infrastructure capacity, and sewage treatment capacity would occur under Alternative 1 and impacts would be less than the less than significant impacts identified for the Project.

(3) Solid Waste

No construction activities would occur under Alternative 1. As such, there would be no potential for Alternative 1 to result in a temporary increase in the generation of solid

waste during construction. Therefore, no construction impacts with regard to the estimated remaining capacity of the Azusa Land Reclamation facility (the unclassified landfill serving the Project Site) would occur under Alternative 1 and impacts would be less than the less than significant impacts identified for the Project.

No new uses or permanent residents would be introduced to the Project Site under Alternative 1. As such, there would be no potential to generate solid waste during the operation of Alternative 1. Therefore, no impacts to solid waste would occur under Alternative 1 and impacts would be less than the less than significant impacts identified for the Project.

n. Energy Resources

Under the No Project Alternative, no new construction or operational activities would occur and, thus, there would be no potential for Alternative 1 to result in a temporary or ongoing increase in the use of energy resources. Therefore, no construction or operational impacts with regard to use of energy resources would occur and impacts would be less than the less than significant impacts identified for the Project.

2. Comparison of Impacts

The No Project Alternative would avoid the proposed Project's significant traffic impact at the Fair Oaks Avenue/Walnut Street intersection, regional construction and operational air quality, and cumulative construction noise impacts. However, land use consistency and land use compatibility impacts would be greater under Alternative 1 than the proposed Project, although they remain less than significant. Impacts associated with the remaining environmental issues would be less than those of the Project.

3. Relationship of the Alternative to Project Objectives

No new development would be introduced on the Project Site under Alternative 1, and the existing uses on the Project Site would continue to operate as they do currently. As a result, Alternative 1 would not meet the objectives to transform a suburban style campus defined by centralized buildings and surface parking in Old Pasadena into a pedestrian-oriented, high-density development with a mix of uses. Alternative 1 would also not meet the objectives of increasing patronage for Old Pasadena businesses nor develop "Class A" office space that would attract new companies to the City as well as stem the loss of existing large companies and employers from leaving the City. Nor would Alternative 1 meet the objective to facilitate travel across the Project Site by improving and

extending Holly Street and restoring Holly Street in accordance with the intent of the original Bennett Plan by extending the visual linkages between City Hall and the Project Site. Alternative 1 would also not create linkages between the Project Site and Old Pasadena, expand upon the adjacent mixed use fabric of the City, or develop open space systems that support an environmentally integrated development. Additionally, project design features that respond to the local climate and weather through the use of passive design strategies would not be constructed under Alternative 1 and, thus, another objective would not be met. Furthermore, Alternative 1 would not create new buildings and open spaces that are compatible with Old Pasadena's architecture and the existing Parson's building. Overall, Alternative 1, the No Project Alternative, would not meet the Project's objectives.

V. Alternatives

B. Alternative 2: Reduced Density—33 Percent Reduction

1. Environmental Impact Analysis

a. Land Use

(1) Land Use Consistency

Alternative 2 would develop the same types and mix of land uses on the Project Site, but at a 33 percent reduced density. Like the Project, Alternative 2 would include a PD Permit to establish development standards that outline how development on-site would occur (e.g., maximum FAR, setbacks, mix of uses, building heights, etc.). Alternative 2 would also include design and building articulation standards comparable to those of the proposed Project and also incorporate the applicable standards set forth in the Central District Specific Plan Design Guidelines. Therefore, like the Project, Alternative 2 would be substantially consistent with applicable land use goals and policies in the General Plan Land Use Element, Central District Specific Plan (including the Specific Plan Design Guidelines), and Pasadena Zoning Code. Even with less development, Alternative 2, as is the case with the proposed Project would be consistent with the goals and policies in the local and regional land use plans related to focusing development within Pasadena's urban core, away from surrounding residential neighborhoods, and in proximity to public transit. Therefore, overall, impacts with regard to land use consistency would be less than significant and similar to those of the Project.

(2) Land Use Compatibility

The types of land uses and their distribution on-site would be the same under Alternative 2 as the Project, with site-wide building height, density, and scale reduced by 33 percent. Therefore, the relationships with surrounding land uses would be substantially similar under Alternative 2 and the Project. Similar to the Project, Alternative 2 would transform a suburban office complex to an urban campus that includes office, restaurant, retail, and residential uses. The new types of land uses would be compatible with other land uses in the Project vicinity. Like the Project, Alternative 2 would improve existing on-site conditions to more closely resemble the traditional urban street pattern of buildings located east and south of the Project Site in Old Pasadena by introducing pedestrian-friendly spaces, a varied mix of land uses, and an activated urban street front. Therefore,

impacts with regard to land use compatibility would be less than significant and similar to those of the Project.

b. Transportation

As with the proposed Project, construction of Alternative 2 would generate vehicle trips associated with construction worker travel, excavation and hauling operations, and the delivery of construction materials to the Project Site. The reduction in development under Alternative 2 would result in construction impacts that would be shorter in overall duration, although construction traffic impacts on a peak construction day are anticipated to be similar to the proposed Project. With the implementation of a construction traffic management plan, like the proposed Project, construction traffic impacts would be reduced to a less than significant level. As the duration of construction impacts would be less, the construction traffic impacts of Alternative 2 would be less than those of the proposed Project.

The following discussion is based on the traffic analysis for the Project alternatives provided in Section XII of the Transportation Study for The Lincoln Properties Project—100 W. Walnut Street EIR (hereinafter the "Traffic Study"), which is included in Appendix B of this Draft EIR.

Under the Reduced Density Alternative, development would be reduced by 33 percent and, consequently, there would be a reduction in vehicle trips to and from the Project Site. Alternative 2 would generate a net total of 5,637 daily trips, including approximately 672 A.M. peak-hour trips and 683 P.M. peak-hour trips. This represents a reduction of 2,252 daily trips, 268 A.M. peak-hour trips and 294 P.M. peak-hour trips or 29 percent as compared to the proposed Project.

(1) Regional Transportation System (Freeways)

As discussed in Section IV.B.1, Transportation, in this Draft EIR, traffic from the proposed Project would result in less than significant impacts at all of the analyzed freeway mainline segments, freeway on-ramps, and freeway off-ramps during both the morning and evening peak hours. Given that daily trips would be reduced by 29 percent under the Reduced Density Alternative, impacts on freeways associated with this alternative would be less than those of the proposed Project. Therefore, the Reduced Density Alternative would also result in less than significant impacts at all of the analyzed freeway mainline segments, freeway on-ramps, and freeway off-ramps during both the morning and evening peak hours. Alternative 2 impacts would, therefore, be less than the less than significant impacts identified for the proposed Project.

(2) Intersections

Under Future (2020) with Alternative 2 conditions, Alternative 2 is forecasted to result in a significant traffic impact at one intersection during the A.M. peak hour and one intersection during the P.M. peak hour, compared to the four intersections during the A.M. peak hour and five intersections during the P.M. peak hour that would be significantly impacted by the proposed Project. Like the proposed Project, with the implementation of mitigation measures, similar to those identified for the proposed Project, all intersection impacts would be reduced to less than significant for Alternative 2 with the exception of the Fair Oaks Avenue/Walnut Street intersection. While a significant impact would occur at this intersection under Alternative 2, as is the case with the proposed Project, the volume-to-capacity (V/C) ratio before mitigation at this intersection would be reduced from 0.901 (LOS E) under the proposed Project to 0.868 (LOS D) under Alternative 2. While the number of intersections that would be significantly impacted after mitigation under Alternative 2 would be the same as the proposed Project, the extent of the impacts at most of the intersections analyzed under Alternative 2 would be less than what is forecasted to occur under the proposed Project. Thus, intersection impacts under Alternative 2 would be less than those of the proposed Project.

(3) Street Segments

Alternative 2 would increase daily traffic on six street segments by 5 to 7.4 percent and on seven street segments by greater than 7.4 percent; however, this increase would be less than the proposed Project which would increase daily traffic on 11 street segments by 5 to 7.4 percent and on nine street segments by greater than 7.4 percent. As is the case with the proposed Project, under Alternative 2, funds would be paid into the Neighborhood Traffic Management Capital Improvement Program Fund to implement traffic management measures to protect neighborhoods potentially influenced by the traffic generated by Alternative 2. However, as is case with the proposed Project, DOT has determined that there are no feasible mitigation measures available to reduce segment impacts to below levels of significance (i.e., widening and/or other physical improvements would be in direct conflict with City policies relative to transportation system enhancements that are sustainable and enhance livability within the City). Thus, Alternative 2 impacts on street segments would be significant, but incrementally less than the less than significant impacts after mitigation identified for the proposed Project.

(4) Congestion Management Plan

As with the proposed Project, the Reduced Density Alternative would not add 150 or more new trips per hour to any Congestion Management Plan (CMP) mainline freeway monitoring station or add more than 50 trips to any CMP arterial monitoring location. As Alternative 2 would generate fewer peak-hour trips than the proposed Project, Alternative 2

impacts with regard to CMP freeway and arterial facilities would be less than the less than significant impacts identified for the proposed Project. Further, the reduced development that would occur under Alternative 2 would also generate fewer transit trips than what is forecasted to occur under the proposed Project. As sufficient capacity exists on the transit lines to accommodate the Project's increase in transit trips which results in a less than significant impact, sufficient capacity would also be available with regard to Alternative 2. Therefore, Alternative 2's impacts on transit per the CMP's analysis guidelines would also be less than significant.

c. Parking

Based on the parking requirements of the PMC, Alternative 2 would require 1,522 parking spaces. With the addition of 1,221 replacement parking spaces, the Alternative 2 subterranean parking structure would provide a minimum of 2,743 parking spaces. Surplus parking is also anticipated to be provided under Alternative 2. As Alternative 2 would provide parking in accordance with PMC requirements for all new land uses and replacement parking for all existing parking spaces that would be displaced by Alternative 2 development, parking impacts would be less than significant and similar to the less than significant impacts of the proposed Project.

d. Aesthetics, Visual Character, and Views

(1) Construction

Similar to the proposed Project, construction activities associated with the Reduced Density Alternative would temporarily alter the visual appearance of the Project Site and surrounding area due to the removal of the surface parking areas. Other construction activities, such as site preparation and grading, the staging of construction equipment and materials, and the construction of new structures also would temporarily alter the visual quality of the Project Site and adjacent roadways. However, construction activities under Alternative 2 would be reduced in scale compared to the proposed Project. Additionally, like the proposed Project, Alternative 2 would implement the same mitigation measures as the proposed Project, which require the use of temporary construction fencing to screen much of the construction activity from view at the street level, as well as requirements for graffiti removal. Compliance with such measures would ensure that impacts to aesthetics/visual quality during construction of Alternative 2 would be less than significant and less than the less than significant impacts of the proposed Project.

In addition to on-site construction activities, like the proposed Project, development of Alternative 2 would include the removal of existing on-site trees within Development Area A, B, and C and the potential removal of existing street trees adjacent to the Project

Site along Walnut Street, Pasadena Avenue, and Holly Street. The removal of these trees would temporarily reduce the visual quality of the Project Site as well as these streets during the construction phase of the alternative; however, this impact would only occur until the replacement of the street trees occurs and the new on-site landscaping is installed. Thus, like the proposed Project, the replacement trees would ultimately improve the streetscape in the Project area. Given that removal would be temporary and would not substantially alter or degrade the existing visual character of the area, impacts to the visual character of the Project Site would be less than significant under Alternative 2 and similar to the less than significant impacts identified for the proposed Project.

With regard to view obstruction, like the proposed Project, there are four notable views (i.e., San Gabriel Mountains, Old Pasadena, City Hall, and St. Andrew Church bell tower) that could be affected during construction of Alternative 2. As the proposed Project would not obstruct an existing valued view, with the reduced overall development and that Alternative 2 would be developed within the same building envelopes as the proposed Project, Alternative 2's impacts to views would also be less than significant and reduced in comparison to the less than significant impacts of the proposed Project.

(2) Operation

Similar to the proposed Project, the transition of the Project Site from a single use office building with surrounding surface parking into a mixed-use urban campus is not an adverse change to the visual character of the Project Site and surrounding area. Like the proposed Project, Alternative 2 would also implement the City's Citywide Design Principles and Central District Design Guidelines as well as the Project's development standards, which would result in a Project design that would enhance and complement the architectural style, landscape, scale, and materials found within the Project area. As a result, impacts related to visual character from Alternative 2 would be less than significant and similar to the less than significant impacts identified for the proposed Project.

Alternative 2 would be developed in accordance with the same development standards as the proposed Project, except that permitted building heights would be reduced by 33 percent. As a result, Alternative 2, as is the case with the proposed Project, would improve views along the Holly Street corridor toward City Hall, would not impact views towards Old Pasadena down the Fair Oaks corridor, and would not impact views of the St. Andrew Church bell tower. With regard to views of the San Gabriel Mountains from the Fair Oaks and Pasadena Avenue corridors, the reduced building heights that would occur under Alternative 2 would not change the limited impacts to the available views of the San Gabriel Mountains that occur under the proposed Project. As such, Alternative 2 would result in less than significant view impacts and impacts that are similar to the less than significant impacts identified for the proposed Project.

e. Light/Glare and Shading

(1) Light/Glare

(a) Construction

Like the proposed Project, construction activities associated with the Reduced Density Alternative would involve the use of various lighting sources which have the potential to spillover to off-site sensitive land uses in the vicinity of the Project Site, although the extent of this impact would be reduced through compliance with PMC Section 9.36.70, which limits the hours of construction. In addition, like the proposed Project, Alternative 2 would be required to implement project design features that include provisions for nighttime lighting to be shielded and/or aimed so that no direct lightbeam spills over outside of the Project Site boundary. Compliance with these measures would ensure that impacts to off-site sensitive uses from lighting sources during construction activities would be less than significant and less than the less than significant impacts identified for the proposed Project due to the reduced amount of construction that occurs under Alternative 2.

In addition to impacts from lighting sources, construction activities associated with the Reduced Density Alternative also have the potential to result in daytime glare impacts. Like the proposed Project, it is unlikely that such impacts would occur, given the fact that large, flat surfaces, like those needed to generate glare, are typically not associated with construction activities and that any glare produced would be highly transitory and short-term. In addition, Alternative 2 would be required to comply with project design features, like the proposed Project, which require the shielding of construction related light sources. Furthermore, like the proposed Project, the potential for nighttime glare is considered negligible since construction would mainly occur during daytime hours and lighting during nighttime hours would be designed to comply with the limitations discussed above. Considering the limited potential for glare during construction and that Alternative 2 would comply with the appropriate project design measures, impacts to off-site sensitive uses from daytime and nighttime glare during construction would be considered less than significant and such impacts would be reduced in comparison to the less than significant impacts of the proposed Project.

(b) Operation

Similar to the proposed Project, Alternative 2 would install new sources of light and glare, such as building lighting, security lighting, and street lights, and form increased vehicle trips in the Project area. Thus, this alternative would increase the light and glare levels emanating from the Project Site. To reduce light and glare impacts, like the proposed Project, Alternative 2 would be required to implement regulatory compliance

measures and project design measures which would ensure that appropriate lighting sources and building materials would be installed throughout the Project Site. Adherence to these measures would ensure that impacts associated with new light and glare sources are less than significant. Alternative 2 impacts would also be less than the less than significant impacts identified for the proposed Project due to the reduced amount of development that occurs under Alternative 2.

(2) Shading

Under the Reduced Density Alternative, heights of development throughout the Project Site would be reduced from what is proposed under the Project. As a result, shading impacts under Alternative 2 would be less than those identified for the proposed Project. As the proposed Project would result in less than significant impacts to shade-sensitive uses during the winter and summer solstices and the spring and fall equinoxes, impacts as a result of Alternative 2 would be less, as well as less than significant.

f. Cultural Resources

(1) Historic Resources

As with the Project, no impacts to on-site historic resources would occur under Alternative 2 because there are no historically significant buildings, structures, objects, or sites located within the Project Site.

Off-site historic resources comprised of contributing buildings to the Old Pasadena Historic District are located south of the Project Site on the opposite side of Union Street and east of the Project Site on the east side of Fair Oaks Avenue. As with the Project, Alternative 2 would not have the potential to alter the immediate surroundings of historic resources south of the Project Site on Union Street because no new buildings would be developed in Development Area E. Development along Fair Oaks Avenue under Alternative 2 would consist of the same types and mix of land uses as the Project, but at a reduced density, height, and scale. As with the Project, Alternative 2 would be governed by the Central District Specific Plan Design Guidelines which provide measures to ensure, among other things, that new developments within the Central District “respect the surrounding character” through “proper consideration of scale, massing, and detail of individual buildings.” Similar to the Project, Alternative 2 would include setback and building articulation standards that incorporate the corresponding standards set forth in the Central District Specific Plan Design Guidelines. Therefore, like the Project, Alternative 2 would result in new construction that is compatible with the overall character of the Historic District, and the integrity of the District would not be materially impaired by alterations to its

setting caused by development within the Project Site. Overall, impacts to historic resources would be less than significant, and similar to those of the Project.

(2) Archaeological and Paleontological Resources

Impacts to archaeological and paleontological resources under the Reduced Density Alternative would be similar to those of the proposed Project since similar levels of ground disturbance would occur. Like the proposed Project, this alternative would be in a region where archaeological resources are known to occur. As such, although no archaeological and paleontological resources have been recorded on-site, the possibility remains that previously undiscovered subsurface prehistoric- or historic-era archaeological and paleontological resources could be encountered during earth-moving construction activities, which is a potentially significant impact. Furthermore, like the proposed Project, it is possible that the Project Site contains undocumented human remains, the disturbance of which would constitute a significant impact. Given these potential impacts, Alternative 2 would be required to implement mitigation similar to Mitigation Measures IV.D.2-1 through IV.D.2-13, which require procedures to follow should there be a discovery of archaeological resources, paleontological resources, and/or human remains. Implementation and compliance with such mitigation measures would reduce potentially significant impacts to a less than significant level, and impacts under Alternative 2 would be similar to the proposed Project.

g. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the proposed Project, construction of Alternative 2 would generate pollutant emissions through the use of heavy-duty construction equipment and through haul truck and construction worker trips. The overall amount of site preparation and building construction would be less under this alternative compared to the proposed Project due to the decrease in square footage to be developed under this alternative. However, pollutant emissions from construction activities would be similar on a daily basis, because the duration and not the intensity of these activities would decrease compared to the proposed Project. Thus, overall construction emissions generated by Alternative 2 would be less than those of the proposed Project over the construction period. However, impacts during maximum activity conditions, those used for measuring significance, would be similar to those of the proposed Project. As such, similar to the proposed Project, regional emissions would be significant and unavoidable even with the incorporation of mitigation measures.

Localized pollutant construction impacts also would be similar to the proposed Project since the intensity of excavation would be similar. Therefore, as with the proposed Project localized emissions would be less than significant and such impacts would be similar to those of the proposed Project.

(b) Toxic Air Contaminants

With respect to construction air toxics, diesel particulate emissions associated with heavy equipment operations during grading and excavation activities represent the greatest potential for TAC emissions. As noted above, the construction emissions generated by Alternative 2 would be less than those of the proposed Project over the construction period and, thus, would result in reduced diesel particulate emissions. Therefore, like the proposed Project, construction-related air toxic emission impacts of the Reduced Project Alternative would be less than significant and less than those of the proposed Project.

(c) Odors

As with the proposed Project, Alternative 2 would have the potential to produce odors during construction associated with the operation of construction equipment, the application of asphalt, the application of architectural coatings and other interior and exterior finishes, and roofing. However, like the proposed Project, any odors produced during construction of Alternative 2 would dissipate away from the construction area and would be quickly diluted. Thus, as with the proposed Project, impacts associated with objectionable odors during construction would be less than significant. However, such impacts would be reduced under Alternative 2 compared to the proposed Project due to the reduction in construction emissions.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Based on the reduction in square footage, the number of daily trips generated by Alternative 2 would be reduced compared to the proposed Project. As vehicular emissions are dependent on the number of trips, vehicular sources would have a similar decrease in pollutant emissions compared to the proposed Project. With the reduction in overall square footage, both area sources and stationary sources would generate a similar reduction in pollutant emissions. As the overall square footage and vehicular trips associated with Alternative 2 would decrease in comparison to the proposed Project, regional operational emissions under Alternative 2 would be less than those of the proposed Project, but like the proposed Project would be significant and unavoidable even with the incorporation of mitigation measures and less than significant for on-site localized operational emissions.

As localized operational impacts are also determined by the peak-hour intersection traffic volumes, the decrease in operational trips during the peak hours associated with this alternative would contribute to a proportionate decrease in localized emissions of carbon monoxide. Since the localized CO hotspot analysis for the proposed Project did not result in any significant localized CO impacts and as traffic volumes would decrease with Alternative 2, similar to the proposed Project, localized impacts would be less than significant under this Alternative. However, such impacts would be less than those of the proposed Project.

(b) Toxic Air Contaminants

The primary sources of potential air toxics associated with proposed Project operations include diesel particulate matter from delivery trucks and emergency backup generators, and to a lesser extent, natural gas equipment such as a boiler. As with the proposed Project, Alternative 2 would involve the installation of an additional back-up diesel powered emergency generator. However, with the reduction in building square footage, this alternative would reduce the proposed Project's operational diesel particulate matter emissions associated with truck deliveries. Thus, similar to the proposed Project, Alternative 2 would result in a less than significant air quality impact associated with air toxics and such impacts would be reduced compared to the proposed Project.

(c) Odors

As with the proposed Project, Alternative 2 would not include any uses identified by the SCAQMD as being associated with odors. Therefore, similar to the proposed Project, potential odor impacts would be less than significant under this alternative and would be less than those of the proposed Project due to the reduction in building square footage.

h. Climate Change

Similar to the proposed Project, this Alternative would be consistent with the growth projections set forth in the City's General Plan Land Use Element for the Central District. These growth projections are reflected in SCAG's forecasts as the designated MPO and provided for incorporation into CARB's *Climate Change Scoping Plan* (e.g., 2020 BAU employment and population growth rates). As with the proposed Project, Alternative 2 would incorporate numerous project design features to reduce GHG emissions and would be designed to meet the criteria for LEED Silver designation. With consideration of this Alternative's design features to reduce cumulative GHG, this Alternative would emit fewer GHG than the proposed Project due to its reduction in daily trips relative to the proposed Project. By incorporating energy and vehicle trip reducing features and mitigation measures, such as designing, constructing, and operating the proposed Project to meet LEED Silver certification, Alternative 2 would be similar to the proposed Project and would

result in a reduction in GHG emissions from "business-as-usual" consistent with the goals of the State of California and City of Pasadena. As such, GHG impacts under Alternative 2 are considered less than significant and would be less than those of the proposed Project due to the reduction in construction and building development.

i. Noise and Vibration

(1) Construction

(a) Noise

Like the proposed Project, construction activities associated with the development of the Reduced Density Alternative have the potential to generate noise and vibration impacts through the use of construction equipment as well as from construction traffic. Development of Alternative 2 would involve the same stages of construction as the proposed Project, including demolition and shoring/excavation stages, which under the proposed Project would result in a less than significant impact at a Project-level but a significant impact on a cumulative basis. Although construction would be reduced under Alternative 2, peak-day demolition and shoring/excavation activities would be comparable to those of the proposed Project. Thus, Alternative 2 construction would result in impacts that would be similar on a peak day, but less than those of the proposed Project due to the reduction in building square footage. As a result, Alternative 2, as is the case with the proposed Project, would result in a less than significant impact at a Project-level but a significant impact on a cumulative basis.

In addition to on-site construction noise sources, the Reduced Density Alternative would generate off-site construction noise from sources such as materials delivery, concrete mix, haul trucks, and construction worker vehicles. Similar to the proposed Project, the main noise sources associated with off-site construction trucks would be associated with delivery/haul trucks. Construction-related delivery/haul trucks would access the Project Site from the 210 Freeway and trips to and from the Project Site would peak at 346 trips during the shoring and excavation phase of construction, like the proposed Project. While it is anticipated that construction truck trips would be reduced under the Reduced Density Alternative, peak day trips would remain the same as the proposed Project, and, as such, Alternative 2 would result in less than significant impacts at a Project level but potentially significant impacts at a cumulative level, similar to those of the proposed Project, but would be less than the proposed Project on an overall basis due to the reduction in building square footage.

(b) Vibration

Similar to the proposed Project, the Reduced Density Alternative would generate ground-borne construction vibration during site demolition and excavation/grading activities. The estimated vibration velocity levels (from all construction equipment) for the proposed Project would be well below the significance thresholds of 0.12 PPV (applicable to the buildings designated as contributors to the Old Pasadena Historic District that are located south and east of the Project Site) and 0.2 PPV (applicable to the buildings north and west of the Project Site). Given the reduced development levels that would occur under Alternative 2, impacts would be similar during peak construction periods, but would be reduced compared to those of the proposed Project on an overall basis due to the reduction in building square footage. Thus, impacts under Alternative 2 would be less than the less than significant impacts identified for the proposed Project.

The vibration significance threshold with regard to human annoyance is less restrictive than the vibration significance threshold with regard to building damage. As Alternative 2 would result in less than significant vibration impacts with regard to building damage, impacts with regard to human annoyance from construction vibration sources, as is the case with the proposed Project, would also be less than significant. However, Alternative 2 impacts would be less than the Project on an overall basis due to the reduction in building square footage.

(2) Operation

Similar to the proposed Project, development of the Reduced Density Alternative would result in on-site stationary noise, off-site mobile noise, and composite noise level impacts. With regard to on-site stationary noise, the Reduced Density Alternative would include the operation of mechanical equipment such as HVAC condenser units, parking facilities, and loading dock/trash collection areas. Like the proposed Project, these noise sources have the potential to generate noise exceeding ambient noise levels and, thus, Alternative 2 would be required to implement regulatory compliance measures and project design features like those proposed for the Project, to ensure that noise impacts are reduced to a less than significant level. Compliance with these measures would ensure that noise impacts associated with the Reduced Density Alternative would be less than significant and less than the less than significant impacts identified for the proposed Project due to the reduction in building square footage.

Off-site mobile noise sources include increased volumes of traffic on nearby roadway segments. Existing and future traffic conditions that would result from development of the Project were evaluated to determine if there would be impacts to noise sensitive uses along the roadway segments. While both existing and future roadway noise

conditions would increase with development of the proposed Project, neither would result in significant impacts. Given that development would be reduced under Alternative 2, traffic volumes on nearby roadways segments would also be reduced. Therefore, off-site traffic noise impacts associated with the Reduced Density Alternative would be less than significant and less than the less than significant impacts associated with the proposed Project.

j. Hydrology

(1) Surface Water Hydrology

Given that the footprint of development under Alternative 2 would be similar to the proposed Project, the types of construction activities required for the Reduced Density Alternative would be similar to those required for the proposed Project. Consequently, landscaping and open space would largely remain the same, which is anticipated to result in similar impacts to surface water hydrology. The minor alterations to drainage patterns during construction of Alternative 2 would not result in significant erosion or siltation on- or off-site because, like the proposed Project, Alternative 2 would be required to implement a Stormwater Pollution Prevention Plan (SWPPP), which would specify Best Management Practices (BMPs) and erosion control measures to be used during construction.

Upon buildout, it is estimated that the Reduced Density Alternative would result in a decrease in the amount of impervious surfaces on the Project Site as compared to the Project due to the expansion of landscaping and open space. Alternative 2 would also be subject to the terms and conditions of the applicable portions of the Los Angeles County National Pollutant Discharge Elimination System (NPDES) permit, which require BMPs designed to reduce operational discharges containing pollutants, as well as the implementation of a Standard Urban Stormwater Mitigation Plan (SUSMP) for the operational life of Alternative 2, similar to the proposed Project. Therefore, impacts on surface water hydrology would be less than significant under Alternative 2 and similar to the less than significant impacts identified for the proposed Project.

(2) Surface Water Quality

The earthwork and ground-disturbing activities that would occur under Alternative 2 would be similar to those under the proposed Project. Therefore, the types of new pollutants that could be introduced to the Project Site during construction and operation of Alternative 2 would be similar to the proposed Project. Like the proposed Project, construction contractors for Alternative 2 would be required to comply with City grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion. In addition, in accordance with the requirements of the

Regional Water Quality Control Board (RWQCB) Construction General Permit, Alternative 2 would implement a SWPPP that would specify BMPs and erosion control measures to be used during construction to manage runoff flows and minimize the potential for impacts to surface water quality from spills of hazardous, toxic, or petroleum substances during construction of Alternative 2, as discussed above. As with the proposed Project, Alternative 2 would be subject to the provisions of the Los Angeles County Municipal Separate Storm Sewer System and NPDES permit during operations. Therefore, impacts on surface water quality would be less than significant under Alternative 2 and less than the less than significant impacts identified for the Project.

(3) Groundwater Hydrology

Similar to the proposed Project, construction of Alternative 2 would not impact groundwater recharge because the Project Site is currently mostly paved and natural recharge to the groundwater basin occurs primarily from percolation of flow at the Arroyo Seco. In addition, Alternative 2 would not include the construction of injection or water supply wells. Furthermore, due to the reduction in development under Alternative 2, the subterranean parking structure that would be constructed under Alternative 2 would include a commensurate reduction in parking spaces compared to the subterranean parking structure proposed by the Project. Like the proposed Project, excavation of the subterranean garage would not exceed 42 feet in depth. As such, the excavation would be substantially above the average annual depth to groundwater at the Project Site, which is estimated at approximately 220 feet below ground surface and the minimum depth of 83 feet over the 83-year period of record. As such, dewatering would not be required during construction of Alternative 2. Therefore, impacts on groundwater hydrology would be less than significant under Alternative 2 and similar to the less than significant impacts identified for the proposed Project.

(4) Groundwater Quality

As discussed above, like the proposed Project, excavation for Alternative 2's subterranean garage is not expected to exceed 42 feet in depth. As such, the excavation would be substantially above the average annual depth to groundwater at the Project Site, as described above. The extent of construction activities would be reduced due to the reduction in development under Alternative 2. Therefore, the degree to which common construction materials such as fuels, paints, cleaners, solvents, and welding materials would be used at the Project Site during construction of Alternative 2 would be less than under the proposed Project. Like the proposed Project, Alternative 2 would comply with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, which would reduce the potential for the construction of Alternative 2 to release contaminants into groundwater that could affect existing groundwater, expand the area or increase the level of groundwater contamination, or cause

a violation of regulatory water quality standards at an existing production well. In addition, the degree to which chemicals commonly used for janitorial, general maintenance, and domestic purposes would be used at the Project Site during operation of Alternative 2 would be less than under the proposed Project. Therefore, impacts on groundwater quality would be less than significant under Alternative 2 and similar to the less than significant impacts identified for the Project because Alternative 2, like the proposed Project, would include a subterranean garage that would preclude percolation that would affect groundwater quality beneath the Project Site.

k. Hazards and Hazardous Materials

(1) Construction

Similar to the proposed Project, during construction fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, solvents, welding materials, and caustic or acidic cleaners could be used, handled, and stored on the Project Site under Alternative 2. In addition, construction of Alternative 2 could involve hazardous materials, such as fuels, paints, solvents, and concrete additives, which would require proper management and, in some cases, disposal. To reduce impacts related to the use, storage, and management of hazardous materials and hazardous waste management, like the proposed Project, Alternative 2 would implement mitigation similar to Mitigation Measure F-1, which requires preparation of a Soil Management Plan. In addition, as with the proposed Project, Alternative 2 would implement regulatory compliance measures that would ensure that construction of Alternative 2 would occur in accordance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials as well as the handling and disposal of hazardous waste. Therefore, construction of Alternative 2 would not expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. As with the proposed Project, the existing buildings would remain intact during construction of Alternative 2, and, therefore, it is not anticipated that any asbestos containing materials (ACMs) would be released nor is it anticipated that lead based paint (LBP) nor PCBs would cause any hazard. Similar to the proposed Project, construction activities associated with Alternative 2 could increase response times for emergency vehicles traveling to the Project Site and nearby uses along surrounding streets. To reduce potential impacts, Alternative 2 would implement the same construction traffic management plan as the proposed Project to address issues including, but not limited to, the ongoing availability of emergency access to and around the Project Site. As such, construction impacts under Alternative 2 would be less than significant with mitigation, as with the proposed Project. However, as construction activities would be reduced under Alternative 2, the potential for impacts to occur would be less under Alternative 2 than the proposed Project. Impacts related to the potential for construction-related traffic to interfere with emergency response vehicles would also be less than

significant with implementation of a construction traffic management plan and less than the less than significant impacts identified for the Project due to the reduced number of construction vehicle trips over the duration of Alternative 2's construction period.

(2) Operation

Similar to the proposed Project, large quantities of hazardous materials are not anticipated to be used with development of Alternative 2's office, restaurant, retail, residential, and parking uses. It is anticipated that hazardous waste generating activities could increase at the Project Site under Alternative 2, as with the proposed Project. However, like the proposed Project, Alternative 2 would implement regulatory compliance measures that would ensure that construction of Alternative 2 would occur in accordance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials as well as the handling and disposal of hazardous waste. As such, compliance with relevant regulations and requirements would ensure that operation of Alternative 2 would not expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Due to the decrease in development, Alternative 2 would reduce the transport, use, and storage of hazardous materials as well as the generation, handling, and disposal of hazardous waste. In addition, as with the proposed Project, existing emergency response and evacuation plans would be updated by the City and/or new plans created, as appropriate, to include the operation of Alternative 2. As such, operational impacts under Alternative 2 would be less than significant and less than the less than significant impacts identified for the Project.

I. Public Services

(1) Police Protection

(a) Construction

Alternative 2 would reduce the density of development on the Project Site by 33 percent; however, construction would still take place on the entire site and construction activities would be similar to those under the proposed Project. As such, similar to the proposed Project, there is the potential for a temporary increase in criminal activities such as theft and vandalism, which could increase the demand for Pasadena Police Department (PPD) services. To reduce potential impacts, this alternative would implement the same project design features and mitigation measures as the Project requiring the implementation of security measures during construction, including security fencing, lighting, locked entry, security patrol, a closed-circuit security camera system, and coordination with the PPD prior to and during construction activities on the Project Site. Therefore, as with the Project, construction-related impacts to police protection services

would be less than significant and less than the less than significant impact of the proposed Project.

Similar to the proposed Project, the on-site portions of Holly Street and Leonard J. Pieroni Street would be temporarily closed during construction which would take approximately six (6) months to complete. In addition to these street closures, construction activities would also generate traffic associated with the movement of construction equipment, the hauling of materials by construction trucks, and construction worker traffic. Both the closures and construction traffic could impact the delivery of police protection services to the Project Site and have the potential to affect police response times due to travel time delays caused by traffic on the roadways surrounding the Project Site. However, like the proposed Project, Alternative 2 would implement mitigation measures requiring the Project's construction management plan to implement provisions that address emergency vehicle access to the Project Site during all periods of construction, particularly during the time when Holly Street and Leonard J. Pieroni Street are being reconstructed. Thus, impacts related to police response times would be reduced to acceptable levels and Alternative 2 would not exceed the capability of the PPD to serve the Project Site or vicinity and impacts on police protection services during construction would be considered less than significant. In addition, such impacts would be less than under the proposed Project due to the reduced scale of development.

(b) Operation

Although Alternative 2 would develop less residential and commercial uses than the proposed Project, it would result in an increase in residential, employee, and visitor population on the Project Site. As such, like the proposed Project, the Reduced Density Alternative could lead to an increase in demand for police services at the Project Site. The Reduced Density Alternative would consist of 318 residential dwelling units, which would result in a net increase of approximately 649 residents. The City's current service population is approximately 140,000 persons and the PPD has an existing officer to population ratio of 1.7 officers for each 1,000 residents. The addition of 649 residents to the City would cause the ratio to remain the same at approximately 1.7 officers for each 1,000 residents. As such, there would be no change in the officer per resident ratio. In addition to an increase in residential population, Alternative 2 would result in an increase in employment and visitors to the Project Site. However, this growth would be less than that of the proposed Project since development of commercial and restaurant uses would be reduced and would not result in a sufficient increase in demand for police services which would warrant the need for new or expanded police facilities. Given that the officer to resident ratio would not change and that the growth of employees and visitors on-site would not be substantial, the Reduced Density Alternative would not require additional police personnel beyond what the PPD currently employs.

In addition to increased population, Alternative 2, like the proposed Project, would increase the potential for crime to occur on the Project Site and in the Project vicinity. Although development would be less than the proposed Project, Alternative 2 would still increase opportunities for property crime with the addition of subterranean parking stalls, residential units, and an increased number of business units with computers and other valuable business equipment. Like the proposed Project, Alternative 2 would be required to comply with project design features and mitigation measures designed to reduce the potential for crimes to occur on the Project Site. These measures would include security features such as as private on-site security, a closed circuit security camera system, keycard entry for residential parking areas within the proposed parking structure, and coordination with the PPD. Compliance with these measures would help offset the increase in demand for police services. Therefore, the Reduced Density Alternative would result in a less than significant impact related to police protection services and would be less than the less than significant impacts of the proposed Project.

(2) Fire Protection

(a) Construction

The types of construction activities required for Alternative 2 would be similar to the proposed Project, but the extent of construction activities would be substantially reduced due to the reduction in development under Alternative 2. Therefore, construction traffic on adjacent streets, which could affect emergency vehicle response times or the delivery of emergency services to the Project Site, would be reduced under Alternative 2. As such, Alternative 2 would not be expected to affect fire fighting and emergency services to the extent that there would be a need for any additional new or expanded fire facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the PFD. Like the proposed Project, Alternative 2 would be required to implement mitigation similar to Mitigation Measures H.2-1 and H.2-2, which require provisions in the construction management plan that addresses emergency vehicle access and an agreement to reimburse the City for the cost of a City Fire Department Inspector, respectively. Therefore, construction impacts on fire protection would be less than significant with mitigation under Alternative 2 and less than the less than significant impacts with mitigation identified for the proposed Project.

(b) Operation

The Project Site is expected to continue to be served by PFD Fire Station No. 31. Although Alternative 2 would develop less residential and commercial uses than the proposed Project, it would result in an increase in the residential, employee, and visitor population on the Project Site. As such, like the proposed Project, Alternative 2 could lead to an increase in demand for fire protection services at the Project Site. Alternative 2 would

consist of 318 residential dwelling units, which would result in a net increase of approximately 649 residents. In addition, Alternative 2 would consist of 415,400 square feet of office uses and 6,700 square feet of restaurant commercial space, which would result in a net increase of approximately 1,679 employees. As such, Alternative 2 would increase the demand for PFD fire protection and emergency medical services, albeit to a lesser extent than the proposed Project. Like the proposed Project, Alternative 2 would be required to comply with applicable regulatory requirements as well as implement mitigation similar to Mitigation Measure H.2-3, which requires the Applicant to submit a plot plan for approval by the PFD prior to the issuance of a building permit. The plot plan would include fire prevention, suppression, and access features designed to reflect the Project Site's proposed occupancy levels, and would be subject to PFD approval. In addition, Alternative 2 would be required to implement mitigation similar to Mitigation Measures H.2-4 through H.2-6, which requires traffic signals in the Project area to be equipped with emergency vehicle traffic signal preemption systems, proposed buildings and the proposed subterranean parking structure to have radio coverage for emergency responders, and fire apparatus roads, respectively. Finally, Alternative 2 would be required to implement mitigation similar to Mitigation Measures H.2-7 through H.2-9 related to fire flow. Alternative 2 would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain PFD service levels. Therefore, operational impacts with regard to response distance, response times, and fire flow would be less than significant with mitigation under Alternative 2 and less than the less than significant impacts with mitigation identified for the proposed Project due to Alternative 2's reduced demand.

(3) Schools

The Reduced Density Alternative would develop less residential and commercial uses than the proposed Project and, thus, would generate fewer students that would attend schools within the Pasadena Unified School District (PUSD). The three schools that would serve the Project Site, McKinley Elementary School, Blair High School, and John Muir High School, would have more than adequate capacity to accommodate students generated by the proposed Project and, consequently, the smaller number of students generated by Alternative 2. Furthermore, pursuant to SB 50, the Applicant would be required to pay development fees for schools to the PUSD prior to the issuance of the Project's building permits and the payment of such fees is considered full and complete mitigation of Project-related school impacts. Given that the PUSD has adequate capacity to accommodate the students generated under the proposed Project and that development fees would offset the impact of additional student enrollment, a less than significant impact associated with Alternative 2 would occur and impacts would be less than those identified for the proposed Project.

(4) Parks and Recreation

(a) Construction

Although development under Alternative 2 would be less than what would be developed under the proposed Project, there would be a corresponding temporary increase in the number of construction workers, similar to the proposed Project. While there would be an increase, it is unlikely that these construction workers would relocate their households as a consequence of working on the alternative and, thus, there would not be a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site. However, there could be a temporary increase in use of nearby public parks and recreational facilities by construction workers during their lunch breaks. Similar to the proposed Project, any resulting increase in the use of such parks and recreational facilities would be temporary and would occur during off-peak park usage hours and utilize facilities that are readily available at the parks. Furthermore, it is unlikely that workers would utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site, because lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Therefore, construction of Alternative 2 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing facilities and services and impacts on parks and recreational facilities during construction would be less than significant. While peak construction activities under Alternative 2 and the proposed Project would be similar, the duration of overall construction would be less due to the reduction in building square footage. As a result, impacts on parks and recreational facilities during construction of Alternative 2 would be less than the impacts attributable to the proposed Project.

(b) Operation

Under the Reduced Density Alternative, development would be reduced by 33 percent, which would result in the construction of 318 residential units, 415,400 square feet of commercial office uses, and 6,700 square feet of restaurant uses. Development of 318 residential units would create an on-site population of approximately 649 persons, which would be 320 persons less than the proposed Project. In addition, commercial development would generate approximately 1,679 new employees, which would be 826 employees less than what is forecasted for the proposed Project. The population increase associated with Alternative 2 would generate additional demand for parks and recreational facilities in the vicinity of the Project Site; however, this increase would be less than what was evaluated for the proposed Project. Furthermore, like the proposed Project, the Reduced Density Alternative would provide on-site open space and residential amenities to serve the recreational needs of residents, employees, and guests. Due to the amount, variety, and availability of the proposed on-site open space and recreational amenities, it is anticipated that residents and employees would utilize the on-site open space areas to

meet their passive recreational needs and as such, the use of off-site public parks and recreational facilities by residents and employees for passive recreational purposes would be reduced. However, for active recreational facilities residents would most likely utilize nearby existing parks in the vicinity of the Project Site as well as the special recreational facilities and amenities found with Memorial Park, Central Park, and the Lower Arroyo Park.

As described in Section IV.K.4, Parks and Recreation, the City has a park per resident standard of 2.73 acres of parkland per 1,000 residents. The ratio within a half mile of the Project Site with the development of the proposed Project is 1.81 acres of parkland per 1,000 residents. While this number is lower than the citywide ratio, the Project Site has two neighborhood parks (Memorial Park and Central Park) within 0.2 mile of the Project Site. Thus, the City's goal of having a neighborhood park or facility within a half mile walk is being met by Alternative 2. In addition, while the Reduced Density Alternative would result in an increase of population on the Project Site, this increase would be less than under the proposed Project and, thus, the demand for park and recreational facilities would be less. Furthermore, similar to the proposed Project, the Reduced Density Alternative would be subject to the Residential Impact Fee Ordinance, which by City policy would mitigate a project's impact on City parks and recreational facilities. Therefore, given the on-site open space, the nearby park and recreational facilities, and the payment of the City's Residential Impact Fees, impacts as a result of development of Alternative 2 would be considered less than significant and less than the less-than-significant impacts under the proposed Project.

(5) Libraries

(a) Construction

Similar to the proposed Project, there would be a temporary increase in the number of construction workers during construction of Alternative 2. While there would be an increase, it is unlikely that these construction workers would relocate their households into the City as a consequence of working on the alternative and, thus, there would not be a corresponding increase in the permanent demand for library services in the vicinity of the Project Site associated with construction workers. Furthermore, it is unlikely that construction workers would utilize Project area libraries on their way to/from work or during their lunch hours. Construction workers would likely utilize library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. Additionally, it is unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in the usage of libraries by construction workers is anticipated to be negligible and impacts on library facilities during

construction of Alternative 2 would be less than significant and less than the less than significant impacts identified for the proposed Project.

(b) Operation

Development under the Reduced Density Alternative would result in an on-site residential population of approximately 649 persons, which would be 320 persons less than the proposed Project, and a commercial population of approximately 1,679 new employees, which would be 826 employees less than the proposed Project. Thus, although growth under Alternative 2 would generate additional demand for library services, the increase would be less than what would be generated under the proposed Project. Furthermore, the Central Library is not currently experiencing any library service deficiencies and is positioned to absorb additional library use. Therefore, the Reduced Density Alternative would not exceed the capacity of local libraries to adequately serve the community and impacts would be less than significant and reduced in comparison to the less than significant impacts of the proposed Project.

m. Utilities

(1) Water Supply

(a) Construction

As with the proposed Project, construction activities associated with Alternative 2 would generate a limited and temporary water demand during construction. With site-wide building height, density, and scale reduced by 33 percent under Alternative 2, the proposed subterranean parking garage would also be reduced by 33 percent. As such, this temporary water demand would be reduced under Alternative 2 as compared to the Project due to the reduced amount of grading and dust control as well as the reduced depth of construction that would be required. Construction activities associated with the proposed Project would result in a limited and temporary water demand which is not anticipated to have any adverse impact on water supply and infrastructure. Like the proposed Project, Alternative 2 would be required to implement measures similar to Regulatory Compliance Measure L.1-1 which addresses the process for the determination that the water conveyance system is adequate. In addition, to the extent the improvements are required for the water lines that directly serve the Project Site, the Applicant would be required to construct the improvements as part of the Alternative's overall construction process. Therefore, construction impacts on water supply and infrastructure would be less than significant under Alternative 2 and less than the less than significant impacts identified for the proposed Project.

(b) Operation

Development of Alternative 2 would result in an overall increase in water demand from the Project Site during operation. However, due to the decrease in development, water demand for Alternative 2 would be less than the proposed Project, which is estimated to consume approximately 300,840 gallons of water per day. This analysis of Alternative 2 also assumes that water conservation measures similar to those of the proposed Project (including the 5-percent reduction for passive water conservation and compliance with several PMC requirements), as applicable, would be implemented. Based on PWP's ability to meet the water demand of the proposed Project as well as existing and planned water demands of its future service area, it is anticipated that PWP would also be able to meet the water demand of Alternative 2. In addition, as with the proposed Project, Alternative 2 is within the City's 2004 General Plan projected development for the Central District and as a result the residential and commercial demands would be accounted for under PWP's growth projections. With respect to infrastructure, similar to the proposed Project, the necessary water distribution lines and connections to PWP's system would be constructed under Alternative 2 in conformance with the City's requirements. Furthermore, Alternative 2 would be required to implement measures similar to Regulatory Compliance Measure L.1-1, which requires that Alternative 2 would be served by adequate water lines. Like the Project, in the event that the improvements are needed with regard to the water lines that connect to those that are located adjacent to the Project Site, the Applicant would pay the City's water main charge for Alternative 2 in accordance with Sections 13.20.080 and 13.28.010 of the PMC. Therefore, operational impacts on water supply and infrastructure would be less than significant with under Alternative 2 and less than the less than significant impacts identified for the proposed Project.

(2) Sewer

(a) Construction

As with the proposed Project, construction activities associated with Alternative 2 would result in a temporary increase in sewage generation as a result of construction workers on-site. The sewage flows that would be generated during construction of Alternative 2 would be reduced as compared to the proposed Project due to the reduction in development under Alternative 2. Construction of the Project is not anticipated to generate sewage flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated by the Sanitation Districts of Los Angeles County. The impacts with respect to traffic, air quality, noise, and emergency access resulting from the installation of any off-site infrastructure under Alternative 2 has been considered in the respective analyses of Alternative 2. In addition, when considering impacts resulting from the installation of any required sewer infrastructure under Alternative 2, all impacts are of a relatively short-term

duration (i.e., months) and would cease to occur once the installation is complete, as with the proposed Project. Therefore, impacts on sewage infrastructure and treatment associated with construction activities would be less than significant under Alternative 2 and less than the less than significant impacts identified for the proposed Project.

(b) Operation

The Project Site is served by the City's local wastewater system, owned by the City and operated by the Department of Public Works Engineering Division. Wastewater generated from the Project Site is treated at the Whittier Narrows WRP or the Los Coyotes WRP. Alternative 2 would result in an overall increase in sanitary sewage flows from the Project Site during operation. However, due to the decrease in development, the daily sewer flow for Alternative 2 would be less than the proposed Project, which is estimated to generate a daily sewer flow of 255,714 gallons per day.[4] With respect to infrastructure, similar to the proposed Project, Alternative 2 would be required to be served by adequate sewer lines. As sewage flows under Alternative 2 would be less than those of the proposed Project, Alternative 2's impacts on the sewer system would also be less. Thus, Alternative 2, as is the case with the proposed Project, would not cause a measurable increase in sewage flows at a point where, and at a time when, a sewer's capacity is already exceeded or that would cause a sewer's capacity to become exceeded. In addition, the Project-generated sewer flow, conservatively forecasted at 0.26 million gallons per day, would be within the available existing capacity of the Whittier Narrows WRP and the Los Coyotes WRP. Based on the ability of the City's local wastewater system to accommodate the additional infrastructure demand created by the proposed Project, it is anticipated that the City's local wastewater system would also be able to accommodate the infrastructure demand of Alternative 2. As with the Project, Alternative 2 would be required to pay the City's sewer facility charge in accordance with Chapter 4.53 of the PMC. In addition, based on the ability of the Whittier Narrows WRP and the Los Coyotes WRP to accommodate the proposed Project's net increase in average daily sewer flow, it is anticipated that the Whittier Narrows WRP and the Los Coyotes WRP would be able to accommodate the daily sewer flow generated by Alternative 2. Therefore, operational impacts on sewage infrastructure and treatment would be less than significant under Alternative 2 and less than the less than significant impacts identified for the proposed Project.

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[4] *As discussed in Section IV.L.2, Utilities and Service Systems—Sewer, of this Draft EIR, an industry-standard multiplication factor of 85 percent was used to establish sewer flow levels, wherein the sewer flows are calculated as 85 percent of the water demand.*

(3) Solid Waste

(a) Construction

As with the proposed Project, construction activities associated with Alternative 2 would result in a temporary increase in the generation of solid waste. The solid waste that would be generated during construction of Alternative 2 would be reduced as compared to the proposed Project due to the reduction in development. As construction of the Project would not have any adverse impact on landfill capacity, the same conclusion would apply to Alternative 2. Therefore, impacts on solid waste associated with construction activities would be less than significant under Alternative 2 and less than the less than significant impacts identified for the proposed Project.

(b) Operation

Solid waste generated in the City is primarily disposed of at the Scholl Canyon landfill. Alternative 2 would result in an overall increase in the generation of solid waste from the Project Site during operation. However, due to the decrease in development, the amount of solid waste generated by Alternative 2 would be less than the proposed Project, which is estimated to generate 1,908.5 tons of solid waste per year (5.2 tons per day). As the estimated solid waste generation for the Project would not exceed the available capacity of Scholl Canyon landfill, the same conclusion would apply to Alternative 2. In addition, like the Project, Alternative 2 would comply with several PMC requirements, including Section 8.61.175 of the PMC regarding the franchisee's recycling system, Section 17.40.120 of the PMC regarding adequate refuse storage facilities and recycling areas, and the CALGreen Code as revised and codified in the PMC. Based on the ability of the Scholl Canyon landfill to accommodate the solid waste generated by the proposed Project, it is anticipated that Scholl Canyon landfill would be able to accommodate the solid waste generated by Alternative 2. Therefore, operational impacts on solid waste would be less than significant under Alternative 2 and less than the less than significant impacts identified for the proposed Project.

n. Energy Resources

(1) Construction

The types of construction activities required for Alternative 2 would be similar to the proposed Project; however, the extent of construction activities would be reduced due to the 33 percent reduction in development under this alternative. While petroleum-based fuels would be consumed by construction vehicles and other energy-consuming equipment, consumption would be reduced given the 33 percent reduction in development which would shorten the duration of construction under Alternative 2. Furthermore, like the proposed

Project, Alternative 2 would be required to comply with mitigation measures designed to reduce the consumption of energy resources such as those identified in Section IV.F, Air Quality, which would reduce the Project's reliance on petroleum-based fuels during construction activities. Thus, consumption of petroleum-based fuels would not be expected to have an adverse impact on available supplies. In addition to petroleum-based fuels, electricity would be consumed during conveyance of the water used for construction; however, consumption of electricity resources would be reduced due to the reduction in development under Alternative 2. As such, construction activities associated with Alternative 2 would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies. Finally, given the 33 percent reduction in development, the use of construction materials that required energy to produce would be reduced under Alternative 2. In addition, like the proposed Project, Alternative 2 would be required to implement energy efficiency measures such as Project Design Feature G-1 and Regulatory Compliance Measure E-1 of the Draft EIR, which would also result in the use of sustainable materials and recycled content that would reduce energy consumption during Project construction. Therefore, like the proposed Project, Alternative 2 would not result in the inefficient use of energy resources, create energy utility system capacity problems, create problems with the provision of energy services, or result in a significant impact associated with the construction of new or expanded energy facilities. As such, impacts would be less than significant and less than the less than significant impacts identified for the proposed Project.

(2) Operation

During operation of the Reduced Density Alternative energy would be consumed for multiple purposes, similar to those identified for the proposed Project. While Alternative 2 would increase energy usage on the Project Site, due to the 33 percent reduction in development the increase in energy consumption would be less than that identified for the proposed Project. Furthermore, like the proposed Project, Alternative 2 would be required to implement a variety of measures designed to reduce energy consumption such as Regulatory Compliance Measure G-1 and Project Design Feature G-2 of this Draft EIR, which require compliance with the various provisions of the 2013 CALGreen Code and prohibits the installation of hearths, respectively. Additionally, PWP's energy demand forecasts are anticipated to account for development of this alternative. Thus, Alternative 2 would be within the demand forecasted within PWP's planning area and would not create energy utility system capacity constraints or require the construction of new or expanded energy facilities beyond what is already anticipated by the City. Furthermore, like the proposed Project, Alternative 2 would result in an increase in vehicle miles traveled (VMT) and, consequently, an increase in the consumption of petroleum-based fuels; however, this increase would be less than the proposed Project. Additionally, like the proposed Project, Alternative 2 would include measures that would facilitate a reduction in VMT and energy consumption. Therefore, like the proposed Project, while operation of Alternative 2 would

increase overall energy use on the Project Site, usage would be reduced through the implementation of the aforementioned regulatory compliance measures and project design features. Therefore, Alternative 2 would not result in the inefficient use of energy resources, create energy utility system capacity problems, create problems with the provision of energy services, or result in a significant impact associated with the construction of new or expanded energy facilities. As such, Alternative 2's impacts would be less than significant and less than the less than significant impacts identified for the proposed Project.

2. Comparison of Impacts

The Reduced Density Alternative would reduce, but not avoid the significant impacts associated with traffic conditions at the Fair Oaks Avenue/Walnut Street intersection, cumulative construction noise, as well as regional construction and operational air quality impacts. Impacts associated with the remaining environmental issues would be similar to or less than those of the Project. Thus, while the Project's impacts on an overall basis are generally reduced under Alternative 2, Alternative 2 does not eliminate any of the Project's significant impacts after mitigation even with a 33 percent reduction in development.

3. Relationship of the Alternative to Project Objectives

Overall, the Reduced Density Alternative would meet most of the Project's objectives. Although reduced in density, Alternative 2 would still transform the existing suburban style campus into a pedestrian-oriented, higher-density development with a mix of uses. Like the proposed Project, the Reduced Density Alternative would create new buildings and open spaces that are compatible with Old Pasadena's architecture and the existing Parsons building. Furthermore, Alternative 2 would facilitate a pedestrian oriented environment by providing public spaces and pathways, by improving and extending Holly Street, and would visually link City Hall to the Project Site, in accordance with the Bennett Plan. However, Alternative 2 would not meet the Project objectives to the same extent as the Project with regard to providing Class "A" office space to stem the loss of existing Pasadena businesses and attract new companies to the City as well as increasing the number of on-site employees and residents that would be available to patronize businesses in Old Pasadena.

V. Alternatives

C. Alternative 3: Alternative Land Use—All Residential

1. Environmental Impact Analysis

a. Land Use

(1) Land Use Consistency

Like the Project, Alternative 3 would include a PD Permit to establish development standards that outline how development on-site would occur (e.g., maximum FAR, setbacks, mix of uses, parking, etc.). Alternative 3 would also include design and building articulation standards as well as incorporate the City's Citywide Design Principles and the Central District Specific Plan Design Guidelines as part of the development standards under which Alternative 3 would be developed. Like the proposed Project, Alternative 3 would include work/live units and a residential amenity area at the street level within Development Area A. However, with nearly entirely residential uses, Alternative 3 would develop a less diverse mix of land uses than the Project. However, to the extent that existing on-site development is considered in conjunction with new development, Alternative 3 would have a mixed-use element. Thus, while the mixed-use nature of Alternative 3 would not be as comprehensive or as integrated as that of the Project, overall, Alternative 3 would be similarly consistent with applicable land use goals and policies in the General Plan Land Use Element, Central District Specific Plan (including the Specific Plan Design Guidelines), and Pasadena Zoning Code. Therefore, impacts with regard to land use consistency would be less than significant and similar to those of the Project.

(2) Land Use Compatibility

The intermixing of various types of land uses and publicly accessible, pedestrian-oriented spaces are inherent characteristics of the Central District. Not only would Alternative 3 include a less diverse mix of land uses than the Project, but it also would do less to promote pedestrian activity and connectivity throughout the Project Site since the North Development Area would be largely developed with residential uses, which, like the proposed Project, would be developed with a secure perimeter. In addition, placing residential uses along the west and north perimeters of the Project Site in proximity to the 210 and 134 Freeways would result in greater adverse land use compatibility and potential toxic air contaminant effects than the Project. Therefore, in terms of forming compatible

relationships with surrounding land uses, Alternative 3 would be less effective than the Project. Overall, impacts with regard to land use compatibility would be less than significant, but greater than those of the Project.

b. Transportation

As with the proposed Project, construction of Alternative 3 would generate vehicle trips associated with construction worker travel, excavation and hauling operations, and the delivery of construction materials to the Project Site. While the land uses developed under Alternative 3 would be different than the proposed Project, the amount of total development (i.e., square footage) would be the same. As a result, construction traffic impacts under Alternative 3 would be similar to those of the proposed Project. With the implementation of a construction traffic management plan, like the proposed Project, construction traffic impacts would be reduced to a less than significant level.

The following discussion is based on the traffic analysis for the Project alternatives provided in Section XII of the Transportation Study for The Lincoln Properties Project—100 W. Walnut Street EIR (hereinafter the "Traffic Study"), which is included in Appendix B of this Draft EIR.

Under Alternative 3, development would consist of 1,396 dwelling units and 10,000 square feet of restaurant uses and, consequently, there would be a reduction in vehicle trips to and from the Project Site. Alternative 3 would generate a net total of 7,682 daily trips, including approximately 565 A.M. peak-hour trips and 690 P.M. peak-hour trips. This represents a reduction of 207 daily trips or 3 percent of daily trips; a reduction of 375 A.M. peak-hour trips or 40 percent A.M. peak-hour trips; and a reduction of 287 P.M. peak-hour trips or 29 percent P.M. peak-hour trips as compared to the proposed Project.

(1) Regional Transportation System (Freeways)

Traffic from the proposed Project would result in less than significant impacts at all of the analyzed freeway mainline segments, freeway on-ramps, and freeway off-ramps during both the morning and evening peak hours. Given that daily trips would be reduced by 3 percent, A.M. peak-hour trips by 40 percent, and P.M. peak-hour trips by 29 percent under Alternative 3, impacts on freeways associated with this alternative would be less than those of the proposed Project. Therefore, Alternative 3 would result in less than significant impacts at all of the analyzed freeway mainline segments, freeway on-ramps, and freeway off-ramps during both the morning and evening peak hours. Alternative 3 impacts would, therefore, be less than the less than significant impacts identified for the proposed Project.

(2) Intersections

Under Future (2020) with Alternative 3 conditions, Alternative 3 is forecasted to result in significant traffic impact at one intersection during the A.M. peak hour and significant traffic impact at one intersection during the P.M. peak hour, compared to the four intersections during the A.M. peak hour and five intersections during the P.M. peak hour that would be significantly impacted by the proposed Project. While the total number of intersections that would be significantly impacted under Alternative 3 would be less than the proposed Project, the increased development of on-site residential units would cause a redistribution of Project traffic. With the implementation of mitigation measures, all intersection impacts would be reduced to less than significant for Alternative 3, whereas with the proposed Project, all intersection impacts would be reduced to less than significant with the exception of the Fair Oaks Avenue/Walnut Street intersection. Intersection impacts under Alternative 3 are concluded to be less than those of the proposed Project.

(3) Street Segments

Alternative 3 would increase daily traffic on 16 street segments by 5 to 7.4 percent and on seven street segments by greater than 7.4 percent. In comparison, the proposed Project would increase daily traffic on 11 street segments by 5 to 7.4 percent and on nine street segments by greater than 7.4 percent. Thus, Alternative 3 would increase daily traffic at five more street segments by 5 to 7.4 percent and two less street segments by greater than 7.4 percent than the proposed Project. The redistribution of traffic when the office uses are replaced with additional residential development would increase the number of segments with increased daily traffic of 5 to 7.4 percent compared to the proposed Project. As is the case with the proposed Project, under Alternative 3, funds would be paid into the Neighborhood Traffic Management Capital Improvement Program Fund to implement traffic management measures to protect neighborhoods potentially influenced by the traffic generated by Alternative 2. However, as is case with the proposed Project, DOT has determined that there are no feasible mitigation measures available to reduce segment impacts to below levels of significance (i.e., widening and/or other physical improvements would be in direct conflict with City policies relative to transportation system enhancements that are sustainable and enhance livability within the City). Thus, Alternative 3 impacts on street segments after mitigation would be significant, and less than the significant impacts after mitigation identified for the proposed Project as the total number of street segments impacted would be less under Alternative 3.

(4) Congestion Management Plan

As with the proposed Project, Alternative 3 would not add 150 or more new trips at any CMP mainline freeway monitoring station or add more than 50 trips to any CMP arterial monitoring location. As Alternative 3 would generate fewer peak-hour trips than the

proposed Project, Alternative 3 impacts with regard to CMP freeway and arterial facilities would be less than the less than significant impacts identified for the proposed Project. Further, Alternative 3 would also generate fewer transit trips than what is forecasted to occur under the proposed Project as transit trips are forecasted based on total trips regardless of land use type. As sufficient capacity exists on the transit lines to accommodate the Project's increase in transit trips which results in a less than significant impact, sufficient capacity is also anticipated to be available with regard to Alternative 3. Therefore, Alternative 3's impacts on transit per the CMP's analysis guidelines would also be less than significant.

c. Parking

Based on the parking requirements of the PMC, Alternative 3 would require 2,270 parking spaces. With the addition of 1,221 replacement parking spaces, the Alternative 3 subterranean parking structure would need to provide a minimum of 3,491 parking spaces. Surplus parking is also anticipated to be provided under Alternative 3. As Alternative 3 would provide parking in accordance with PMC requirements for all new land uses and replacement parking for all existing parking spaces that would be displaced by Alternative 3 development, parking impacts would be less than significant and similar to the less than significant impacts of the proposed Project.

d. Aesthetics, Visual Character, and Views

(1) Construction

Similar to the proposed Project, construction activities associated with Alternative 3 would temporarily alter the visual appearance of the Project Site and surrounding area due to the removal of the surface parking areas. Other construction activities, such as site preparation and grading, the staging of construction equipment and materials, and the construction of new structures also would temporarily alter the visual quality of the Project Site and adjacent roadways. However, construction activities under Alternative 3 would be similar in scale compared to the proposed Project. Additionally, like the proposed Project, Alternative 3 would implement the same mitigation measures as the proposed Project, which require the use of temporary construction fencing to screen much of the construction activity from view at the street level, as well as graffiti removal. Compliance with such measures would ensure that impacts to aesthetics/visual quality during construction of Alternative 3 would be less than significant, and such impacts would be similar in comparison to the less than significant impacts of the proposed Project.

In addition to on-site construction activities, Alternative 3, like the proposed Project, would include the removal of existing on-site trees within Development Areas A, B, and C

and the potential removal of existing street trees adjacent to the Project Site along Walnut Street, Pasadena Avenue, and Holly Street. The removal of these street trees would temporarily reduce the visual quality of the Project Site as well as these streets during the construction phase of the alternative; however, this impact would only occur until the replacement of these trees occurs and the new on-site landscaping is installed. Thus, like the proposed Project, the replacement trees would ultimately improve the streetscape in the Project area. Given that removal would be temporary and would not substantially alter or degrade the existing visual character of the area, impacts to the visual character of the Project Site from development of Alternative 3 would be similar to the proposed Project and less than significant.

With regard to view obstruction, like the proposed Project, there are four notable views (i.e., San Gabriel Mountains, Old Pasadena, City Hall, and St. Andrew Church bell tower) that could be affected during construction of Alternative 3. As the proposed Project would not obstruct an existing valued view, with a similar level of overall development that occurs in accordance with the Project's development standards, Alternative 3's impacts to views would also be less than significant and similar in comparison to the less than significant impacts of the proposed Project.

(2) Operation

Similar to the proposed Project, the transition of the Project Site from a single use office building with surrounding surface parking into a mixed-use urban campus is not an adverse change to the visual character of the Project Site and surrounding area. Like the proposed Project, Alternative 3 would also implement the City's Citywide Design Principles and Central District Design Guidelines as well as the Project's development standards, which would result in a Project design that would enhance and complement the architectural style, landscape, scale, and materials found within the Project area. As a result, impacts related to visual character from Alternative 3 would be less than significant and similar to the less than significant impact identified for the proposed Project.

Alternative 3 would be developed in accordance with the same development standards as the proposed Project, except that the proposed office uses would be replaced with residential development. As a result, Alternative 3, as is the case with the proposed Project, would improve views along the Holly Street corridor towards City Hall, would not impact views towards Old Pasadena down the Fair Oaks corridor, and would not impact views of the St. Andrew Church bell tower. With regard to views of the San Gabriel Mountains from the Fair Oaks and Pasadena Avenue corridors, building heights under Alternative 3 would be the same as the proposed Project, and thus, would result in the same limited impacts to the available views of the San Gabriel Mountains that occur under the proposed Project. As such, Alternative 3 would result in less than significant view

impacts and impacts that are similar to the less than significant impacts identified for the proposed Project.

e. Light/Glare and Shading

(1) Light/Glare

(a) Construction

Like the proposed Project, construction activities associated with Alternative 3 would involve the use of various lighting sources which have the potential to spillover to off-site sensitive land uses in the vicinity of the Project Site, although the extent of this impact would be reduced through compliance with PMC Section 9.36.70, which limits the hours of construction. In addition, like the proposed Project, Alternative 3 would be required to implement project design features that include provisions for nighttime lighting to be shielded and/or aimed so that no direct lightbeam spills over outside of the Project Site boundary. Compliance with these measures would ensure that impacts to off-site sensitive uses from lighting sources during construction activities would be less than significant and similar to the less than significant impact identified for the proposed Project.

In addition to impacts from lighting sources, construction activities associated with Alternative 3 also have the potential to result in daytime glare impacts. Like the proposed Project, it is unlikely that such impacts would occur, given the fact that large, flat surfaces, like those needed to generate glare, are typically not associated with construction activities and that any glare produced would be highly transitory and short-term. In addition, Alternative 3 would be required to comply with project design features, like the proposed Project, which would require the shielding of construction related light sources. Furthermore, like the proposed Project, the potential for nighttime glare is considered negligible since construction would mainly occur during daytime hours and lighting during nighttime hours would be designed to comply with the limitations discussed above. Considering the limited glare sources and that Alternative 3 would comply with the appropriate project design measures, impacts to off-site sensitive uses from daytime and nighttime glare during construction would be considered less than significant and similar than the less than significant impact identified for the proposed Project.

(b) Operation

Similar to the proposed Project, Alternative 3 would install new lighting sources and would introduce new sources of glare, such as building lighting, security lighting, street lights, and signage lighting, as well as from increased vehicle trips in the Project area. While Alternative 3 would increase light levels at the Project Site compared to existing conditions, the change in on-site land uses from office to residential under Alternative 3

may reduce the lighting sources at the Project Site, as light sources related to residential uses tend to be lower in light intensity than what is typically found on commercial buildings. The reduction between commercial and residential is likely to occur with the elimination of commercial signs and the lights used to illuminate the signs, which would be installed under the proposed Project. However, the residential component of Alternative 3 would have increased night-time activity levels which would result in an increase in interior lighting during night-time hours on the Project Site. To reduce light and glare impacts, Alternative 3, like the proposed Project, would be required to implement regulatory compliance measures and project design measures which would ensure that appropriate lighting sources and building materials would be installed throughout the Project Site. Adherence to these measures would ensure that impacts associated with new light and glare sources are less than significant and likely less than the less than significant impact identified for the proposed Project.

(2) Shading

Under the Alternative 3, the development standards, including the heights of development throughout the Project Site would remain the same as those identified for the proposed Project and, thus, would result in similar shading impacts. As the proposed Project would result in less than significant impacts to shade-sensitive uses during the winter and summer solstices and the spring and fall equinoxes, impacts as a result of Alternative 3 would be less than significant.

f. Cultural Resources

(1) Historic Resources

As with the Project, no impacts to on-site historic resources would occur under Alternative 3 because there are no historically significant buildings, structures, objects, or sites located within the Project Site.

Off-site historic resources comprised of contributing buildings to the Old Pasadena Historic District are located south of the Project Site on the south side of Union Street and east of the Project Site on the east side of Fair Oaks Avenue. As with the Project, Alternative 3 would not have the potential to alter the immediate surroundings of historic resources south of the Project Site on Union Street because no new buildings would be developed in Development Area E. Development along Fair Oaks Avenue under Alternative 3 would consist of work/live units and restaurant uses compared to the Project's mix of work/live units, commercial office, and restaurant uses. As with the Project, Alternative 3 would be governed by the Central District Specific Plan Design Guidelines which provide measures to ensure, among other things, that new developments within the

Central District "respect the surrounding character" through "proper consideration of scale, massing, and detail of individual buildings." Similar to the Project, Alternative 3 would include setback and building articulation standards that incorporate the corresponding standards set forth in the Central District Specific Plan Design Guidelines. Therefore, like the Project, Alternative 3 would result in new construction that is compatible with the overall character of the Historic District, and the integrity of the District would not be materially impaired by alterations to its setting caused by development within the Project Site. Overall, impacts to historic resources would be less than significant and similar to those of the Project.

(2) Archaeological and Paleontological Resources

Under Alternative 3, impacts related to archaeological and paleontological resources would be similar to those of the proposed Project given that similar amounts of development and ground disturbance would occur. Like the proposed Project, this alternative would be in a region where archaeological resources are known to occur. As such, although no archaeological and paleontological resources have been recorded on-site, the possibility remains that previously undiscovered subsurface prehistoric or historic-era archaeological and paleontological resources could be encountered during earth-moving construction activities, which is a potentially significant impact. Furthermore, like the proposed Project, it is possible that the Project Site contains undocumented human remains, the disturbance of which would constitute a significant impact. Given these potential impacts, Alternative 3 would be required to implement mitigation similar to Mitigation Measures IV.D.2-1 through IV.D.2-13, which requires procedures to follow should there be a discovery of archaeological resources, paleontological resources, and/or human remains. Implementation and compliance with such mitigation measures would reduce potentially significant impacts to a less than significant level under Alternative 3, similar to the less than significant impacts of the proposed Project.

g. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the proposed Project, construction of Alternative 3 would generate pollutant emissions through the use of heavy-duty construction equipment and through haul truck and construction worker trips. The overall amount of site preparation and building construction would be similar under Alternative 3 compared to the proposed Project due to the similar amount of square footage to be developed under this alternative. Pollutant emissions from construction activities would be similar on a daily basis, as the duration and the intensity of these activities would be similar compared to the proposed Project. Thus,

overall construction emissions generated by Alternative 3 would be similar to those of the proposed Project over the construction period. Impacts during maximum conditions, those used for measuring significance, would be similar to those of the proposed Project. As such, similar to the proposed Project, regional emissions would be significant and unavoidable even with the incorporation of mitigation measures.

Localized pollutant construction impacts also would be similar as the proposed Project since the intensity of excavation would be similar. Therefore, as with the proposed Project localized emissions would be less than significant and such impacts would be similar to those of the proposed Project.

(b) Toxic Air Contaminants

With respect to construction air toxics, diesel particulate emissions associated with heavy equipment operations during grading and excavation activities represent the greatest potential for TAC emissions. As noted above, the construction emissions generated by Alternative 3 would be similar to those of the proposed Project over the construction period and thus would result in similar diesel particulate emissions. In addition, as with the proposed Project, there would be no residual emissions after construction and corresponding individual cancer risk. Therefore, like the proposed Project, construction-related air toxic emission impacts of Alternative 3 would be less than significant and similar to those of the proposed Project.

(c) Odors

As with the proposed Project, Alternative 3 would have the potential to produce odors during construction associated with the operation of construction equipment, the application of asphalt, the application of architectural coatings and other interior and exterior finishes, and roofing. However, like the proposed Project, any odors produced during construction of Alternative 3 would dissipate away from the construction area and would be quickly diluted. Thus, as with the proposed Project, impacts associated with objectionable odors during construction would be less than significant.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Based on the change in land use mix, the number of daily trips generated by Alternative 3 would slightly decrease compared to the proposed Project. As vehicular emissions are dependent on the number of trips, vehicular sources would have a similar decrease in pollutant emissions compared to the proposed Project. With the similar overall square footage, both area sources and stationary sources would also generate similar

pollutant emissions. As the vehicular trips associated with Alternative 3 would slightly decrease in comparison to the proposed Project, regional operational emissions under this alternative would be less than those of the proposed Project, and like the proposed Project would be significant and unavoidable even with the incorporation of mitigation measures and less than significant for on-site localized operational emissions.

Localized operational impacts are also determined by the peak-hour intersection traffic volumes. Therefore, the slight decrease in operational trips during the peak hours associated with Alternative 3 would contribute to a proportionate decrease in localized emissions of carbon monoxide (CO). The localized CO hotspot analysis for the proposed Project did not result in any significant localized CO impacts and impacts were well below the significance thresholds. The slight decrease in traffic volumes under this alternative would not substantially change the results of the Project's CO hotspot analysis. Similar to the proposed Project, localized impacts would be less and less than the less than significant impacts under Alternative 3.

(b) Toxic Air Contaminants

The primary sources of potential air toxics associated with proposed Project operations would include diesel particulate matter from delivery trucks and emergency backup generators, and to a lesser extent, natural gas equipment such as a boiler. As with the proposed Project, Alternative 3 would involve the installation of an additional back-up diesel powered emergency generator and similar operational diesel particulate matter emissions associated with truck deliveries. Thus, similar to the proposed Project, Alternative 3 would result in a less than significant operational air quality impact associated with air toxics and such impacts would be similar compared to the proposed Project.

With the change in land use, this Alternative could potentially locate proposed residential units within 500 feet of a freeway and would be considered inconsistent with the CARB and SCAQMD guidelines for the placement of new sensitive land uses, such as high density multi-family housing, in close proximity to freeways, which are potential sources of toxic air contaminants (TACs). Therefore, this Alternative could result in a significant operational TAC impact and expose proposed residential uses to a cancer risk that would exceed the SCAQMD significance threshold of 10 in one million. However, with implementation of mitigation it is anticipated that these impacts would be reduced to less than significant. While Alternative 3 would result in a less than significant TAC impact, its impacts would be greater than the less than significant impact of the proposed Project.

(c) Odors

As with the proposed Project, Alternative 3 would not include any uses identified by the SCAQMD as being associated with odors. Therefore, similar to the proposed Project, potential odor impacts would be less than significant under this alternative and would be similar to those of the proposed Project due to the similar building square footage.

h. Climate Change

Similar to the proposed Project, this Alternative would be consistent with the growth projections set forth in the City's General Plan Land Use Element for the Central District. These growth projections are reflected in SCAG's forecasts as the designated MPO and provided for incorporation into CARB's *Climate Change Scoping Plan* (e.g., 2020 BAU employment and population growth rates). As with the proposed Project, Alternative 3 would incorporate numerous project design features to reduce GHG emissions and would be designed to meet the criteria for LEED Silver designation. With consideration of this alternative's design features to reduce cumulative GHG, this Alternative would emit slightly less GHG than the proposed Project due to its slight decrease in daily trips relative to the proposed Project. By incorporating energy and vehicle trip reducing features and mitigation measures, such as designing, constructing, and operating the proposed Project to meet LEED Silver certification, Alternative 3 would be similar to the proposed Project and would result in a reduction in GHG emissions from "business-as-usual" consistent with the goals of the State of California and the City of Pasadena. As such, GHG impacts under Alternative 3 are considered less than significant and would be less than those of the proposed Project.

i. Noise and Vibration

(1) Construction

(a) Noise

Like the proposed Project, construction activities associated with the development of Alternative 3 have the potential to generate noise and vibration impacts through the use of construction equipment as well as from construction traffic. Development of Alternative 3 would involve the same stages of construction as the proposed Project, including demolition and shoring/excavation stages, which under the proposed Project would result in a less than significant impact at a Project-level but a significant impact on a cumulative basis. Given that the amount of development under Alternative 3 would be similar to that of the proposed Project, impacts would also be similar.

In addition to on-site construction noise sources, Alternative 3 would generate off-site construction noise from sources such as materials delivery, concrete mix, haul trucks (trucks), and construction worker vehicles. Similar to the proposed Project, the main noise sources associated with off-site construction trucks would be associated with delivery/haul trucks. Construction-related delivery/haul trucks would access the Project Site from the 210 Freeway and trips to and from the Project Site would peak at 346 trips during the shoring and excavation phase of construction, like the proposed Project. However, given the reduction in parking provided under this alternative, construction of the subterranean parking garage and depth of excavation would be reduced compared to the proposed Project. Thus, delivery/haul truck trips would be slightly reduced during construction. While it is anticipated that construction truck trips would be slightly reduced under Alternative 3, peak day trips would remain the same as the proposed Project and, as such, impacts would be less than significant with implementation of the Project's construction traffic management plan.

(b) Vibration

Similar to the proposed Project, Alternative 3 would generate ground-borne construction vibration during site demolition and excavation/grading activities. The estimated vibration velocity levels (from all construction equipment) for the proposed Project would be well below the significance thresholds of 0.12 PPV (applicable to the buildings designated as contributors to the Old Pasadena Historic District that are located south and east of the Project Site) and 0.2 PPV (applicable to the buildings north and west of the Project Site). Given that development under Alternative 3 would be similar to that of the proposed Project, impacts would be similar to those of the proposed Project. Therefore, Alternative 3 vibration impacts associated with potential building damage during construction activities would be less than significant.

The vibration significance threshold with regard to human annoyance is less restrictive than the vibration significance threshold with regard to building damage. As Alternative 3 would result in less than significant vibration impacts with regard to building damage, impacts with regard to human annoyance from construction vibration sources, as is the case with the proposed Project, would also be less than significant. In addition, Alternative 3 impacts would be similar to those of the Project as the amount of construction would be the same.

(2) Operation

Similar to the proposed Project, development of Alternative 3 would result in on-site stationary noise, off-site mobile noise, and composite noise level impacts. In regards to on-site stationary noise, Alternative 3 would include operation of mechanical equipment such

as HVAC condenser units, parking facilities, and loading dock/trash collection areas. Like the proposed Project, these noise sources have the potential to generate noise exceeding ambient noise levels and, thus, Alternative 3 would be required to implement regulatory compliance measures and project design features like those proposed for the Project, to ensure that noise impacts are reduced to a less than significant level. Compliance with these measures would ensure that noise impacts associated with Alternative 3 are reduced to a less than significant level, similar to the proposed Project.

Off-site mobile noise sources include increased volumes of traffic on nearby roadway segments. Existing and future traffic conditions that would result from development of the Project were evaluated to determine if there would be impacts to noise sensitive uses along the roadway segments. While both existing and future roadway noise conditions would increase with development of the proposed Project, neither would result in significant impacts. Given that traffic volumes would be reduced under Alternative 3, off-site traffic noise impacts associated with Alternative 3 would be less than the less than significant impacts of the proposed Project.

j. Hydrology

(1) Surface Water Hydrology

The types and extent of construction activities required for Alternative 3 would be similar to the proposed Project. Landscaping and open space would be modified to provide for a mostly residential community. The minor alterations to drainage patterns during construction of Alternative 3 would not result in significant erosion or siltation on- or off-site because the implementation of a SWPPP would specify BMPs and erosion control measures to be used during construction, similar to those identified for the proposed Project. Upon buildout, it is estimated that Alternative 3 would result in a similar net increase in the amount of impervious surfaces on the Project Site as compared to the proposed Project (which would result in a limited increase in the extent of impervious surfaces on the Project Site). Alternative 3 would also be subject to the terms and conditions of the applicable portions of the Los Angeles County NPDES permit, which require BMPs designed to reduce operational discharges containing pollutants, as well as the implementation of a SUSMP for the operational life of Alternative 3, similar to the proposed Project. Therefore, impacts on surface water hydrology would be less than significant under Alternative 3 and similar to the less than significant impacts identified for the proposed Project.

(2) Surface Water Quality

The earthwork and ground-disturbing activities that would occur under Alternative 3 would be similar to the proposed Project due to the development of a similar amount of square footage compared to the proposed Project. Therefore, the degree to which new pollutants could be introduced to the Project Site during construction and operation of Alternative 3 would be similar to the proposed Project. As with the proposed Project, construction contractors for Alternative 3 would be required to comply with City grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion. In addition, in accordance with the requirements of the RWQCB Construction General Permit, Alternative 3 would implement a SWPPP that would specify BMPs and erosion control measures to be used during construction to manage runoff flows and minimize the potential for impacts to surface water quality from spills of hazardous, toxic, or petroleum substances during construction of Alternative 3, as discussed above. As with the proposed Project, Alternative 3 would be subject to the provisions of the Los Angeles County Municipal Separate Storm Sewer System and NPDES permit during operations. Therefore, impacts on surface water quality would be less than significant under Alternative 3 and similar to the less than significant impacts identified for the proposed Project.

(3) Groundwater Hydrology

As with the proposed Project, construction of Alternative 3 would not impact groundwater recharge because the Project Site is currently mostly paved and natural recharge to the groundwater basin occurs primarily from percolation of flow from the Arroyo Seco. In addition, Alternative 3 would not include the construction of injection or water supply wells. Furthermore, due to the change from office to residential development under Alternative 3, the number of parking spaces in the subterranean parking garage would be less compared to the parking garage proposed by the Project and provided according to the number of proposed residential units, restaurant space, and replacement parking to support the existing on-site commercial uses. Thus, the depth of excavation for the parking garage would be less than the proposed Project and would not exceed the 42 feet in depth that would occur under the proposed Project. As such, the excavation would be substantially above the average annual depth to groundwater at the Project Site, which is estimated at approximately 220 feet below ground surface and the minimum depth of 83 feet over the 83-year period of record. As such, dewatering would not be required during construction of Alternative 3. Therefore, impacts on groundwater hydrology would be less than significant under Alternative 3 and similar to the less than significant impacts identified for the Project.

(4) Groundwater Quality

As discussed above, like the Project, the excavation for Alternative 3's subterranean garage is not expected to exceed 42 feet in depth. As such, the excavation would be substantially above the average annual depth to groundwater at the Project Site, as described above. The extent of construction activities would be similar to the proposed Project due to the development of a similar amount of square footage compared to the proposed Project. Therefore, the degree to which common construction materials such as fuels, paints, cleaners, solvents, and welding materials would be used at the Project Site during construction of Alternative 3 would be similar to the proposed Project. Like the proposed Project, Alternative 3 would comply with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, which would reduce the potential for the construction of Alternative 3 to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. In addition, the degree to which chemicals commonly used for janitorial, general maintenance, and domestic purposes would be used at the Project Site during operation of Alternative 3 would be similar to the proposed Project. Therefore, impacts on groundwater quality would be less than significant under Alternative 3 and similar to the less than significant impacts identified for the proposed Project.

k. Hazards and Hazardous Materials

(1) Construction

As with the proposed Project, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, solvents, welding materials, and caustic or acidic cleaners could be used, handled, and stored on the Project Site under Alternative 3. In addition, construction of Alternative 3 could involve hazardous materials, such as fuels, paints, solvents, and concrete additives, which would require proper management and, in some cases, disposal. To reduce impacts related to the use, storage, and management of hazardous materials and hazardous waste management, Alternative 3, like the proposed Project, would be required to implement mitigation similar to Mitigation Measure F-1, which requires preparation of a Soil Management Plan. In addition, as with the proposed Project, Alternative 3 would implement regulatory compliance measures that would ensure that construction of Alternative 3 would occur in accordance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials as well as the handling and disposal of hazardous waste. Therefore, construction of Alternative 3 would not expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. As with the proposed Project, the existing buildings would remain intact during construction of Alternative 3, and, therefore, it is not anticipated that any

ACMs would be released nor is it anticipated that LBP nor PCBs would cause any hazard. Construction activities associated with Alternative 3 could increase response times for emergency vehicles traveling to the Project Site and nearby uses along surrounding streets, similar to the proposed Project. To reduce potential impacts, Alternative 3 would implement the same construction traffic management plan as the proposed Project to address issues including, but not limited to, the ongoing availability of emergency access to and around the Project Site. As such, construction impacts under Alternative 3 would be less than significant with mitigation, and similar to the proposed Project's impacts, which would also be less than significant with mitigation. Impacts related to the potential for construction-related traffic to interfere with emergency response vehicles would also be less than significant with implementation of a construction traffic management plan and similar to the less than significant impacts identified for the proposed Project.

(2) Operation

As with the proposed Project, large quantities of hazardous materials are not anticipated to be used with development of Alternative 3's restaurant, residential, and parking uses. It is anticipated that hazardous waste generating activities could increase at the Project Site under Alternative 3, but to a lesser extent than the proposed Project due to the development of nearly entirely residential uses (which typically generate less hazardous waste than non-residential uses) under Alternative 3 compared to the mixed-use office campus and residential community that would be developed under the proposed Project. However, as with the proposed Project, Alternative 3 would implement regulatory compliance measures that would ensure that construction of Alternative 3 would occur in accordance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials as well as the handling and disposal of hazardous waste. As such, with compliance with relevant regulations and requirements, operation of Alternative 3 would not expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Due to the development of a similar amount of square footage compared to the proposed Project, Alternative 3 would result in a similar level of transport, use, and storage of hazardous materials as well as a similar level of generation, handling, and disposal of hazardous waste. In addition, as with the proposed Project, existing emergency response and evacuation plans would be updated by the City and/or new plans created, as appropriate, to include the operation of Alternative 3. As such, operational impacts under Alternative 3 would be less than significant and less than the less than significant impacts identified for the proposed Project.

I. Public Services

(1) Police Protection

(a) Construction

Compared to the proposed Project, Alternative 3 would reduce the amount of commercial uses on the Project Site, but would increase the number of residential units from 475 to 1,396 units. Construction activities associated with Alternative 3 would be similar to those under the proposed Project. As such, similar to the proposed Project, there is the potential for a temporary increase in criminal activities such as theft and vandalism of the construction site, which could increase the demand for PPD services. To reduce potential impacts, this alternative would implement the same project design features and mitigation measures as the Project requiring the implementation of security measures during construction, including security fencing, lighting, locked entry, security patrol, a closed-circuit security camera system, and coordination with the PPD prior to and during construction activities on the Project Site. Therefore, as with the Project, Alternative 3 construction-related impacts to police protection services would be less than significant and similar to the less than significant impacts identified for the proposed Project.

Similar to the proposed Project, the on-site portions of Holly Street and Leonard J. Pieroni Street would be temporarily closed for approximately six months during construction. In addition to these street closures, construction activities would also generate traffic associated with the movement of construction equipment, the hauling of materials by construction trucks, and construction worker traffic. Both the closures and construction traffic could impact the delivery of police protection services to the Project Site and have the potential to affect police response times due to travel time delays caused by traffic on the roadways surrounding the Project Site. However, like the proposed Project, Alternative 3 would implement mitigation measures requiring the Project's construction management plan to include provisions regarding the maintenance of police vehicle access to all areas of the Project Site during the time when Leonard J. Pieroni Street is being reconstructed. Thus, Alternative 3 would not exceed the capability of the PPD to serve the Project Site or vicinity, and impacts on police protection services during construction would be considered less than significant and similar to the less than significant impacts identified for the proposed Project.

(b) Operation

Population growth associated with the development of Alternative 3 would be different than that associated with the proposed Project. Alternative 3 would increase the on-site residential population by 2,848 residents and would incrementally increase employees and visitors through the development of 10,000 square feet of restaurant uses.

Similar to the proposed Project, Alternative 3's increase in residential, employee, and visitor populations could lead to an increase in demand for police services at the Project Site. As mentioned above, Alternative 3 would consist of 1,396 residential dwelling units, which would result in a net increase of approximately 2,848 residents. The City's current service population is approximately 140,000 persons and the PPD has an existing officer to population ratio of 1.7 officers for every 1,000 residents. The addition of 2,848 residents to the City would cause the ratio to incrementally decrease to approximately 1.67 officers for every 1,000 residents. As such, there would be a less than 2-percent change in the officer per resident ratio. In addition to an increase in residential population, Alternative 3 would result in a slight increase in employment and visitors to the Project Site through the development of restaurant uses. However, this growth would not greatly contribute to the increase in demand for police services and would be less than that of the proposed Project. Given that the officer to resident ratio would incrementally decrease and that the growth of employees and visitors on-site would not be substantial, Alternative 3 would not require additional police personnel beyond what the PPD currently employs.

In addition to increased population, like the proposed Project, Alternative 3 would increase the potential for crime to occur on the Project Site and in the Project vicinity. Like the proposed Project, Alternative 3 would increase opportunities for property crime with the addition of subterranean parking stalls and 1,396 residential units. As such, Alternative 3 would be required to comply with project design features and mitigation measures designed similar to those for the Project to reduce the potential for crimes to occur on the Project Site. These measures would include security features such as as private on-site security, a closed circuit security camera system, keycard entry for residential parking areas within the proposed parking structure, and coordination with the PPD. Compliance with these measures would help offset the increase in demand for police services. Therefore, Alternative 3 would result in a less than significant impact related to police protection services and would be greater than the less than significant impacts of the proposed Project due to the increased on-site residential population.

(2) Fire Protection

(a) Construction

Compared to the proposed Project, Alternative 3 would reduce the amount of commercial uses on the Project Site, but would increase the number of residential units from 475 to 1,396 units. The types and extent of construction activities required for Alternative 3 would be similar to the Project. Therefore, construction traffic on adjacent streets, which could affect emergency vehicle response times or the delivery of emergency services to the Project Site, would be similar under Alternative 3 compared to the proposed Project. Alternative 3 construction would not be expected to affect fire fighting and emergency services to the extent that there would be a need for any additional new or

expanded fire facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the PFD. Like the Project, Alternative 3 would be required to implement mitigation similar to Mitigation Measures H.2-1 and H.2-2, which require provisions in the construction management plan that addresses emergency vehicle access and an agreement to reimburse the City for the cost of a City Fire Department Inspector, respectively. Therefore, construction impacts on fire protection would be less than significant with mitigation under Alternative 3 and similar to the less than significant impact identified for the Project.

(b) Operation

The Project Site is expected to continue to be served by PFD Fire Station No. 31. Population growth associated with the development of Alternative 3 would be different than that associated with the proposed Project. Specifically, the 1,396 dwelling units that would be developed under Alternative 3 would increase the on-site residential population by 2,848 residents. As such, like the proposed Project, Alternative 3 could lead to an increase in demand for fire protection services at the Project Site. In addition to an increase in residential population, Alternative 3 would result in a slight increase in employment and visitors to the Project Site through the development of restaurant uses. Overall, due to the increased residential population that would be generated by Alternative 3 compared to the proposed Project, Alternative 3 would increase the demand for PFD fire protection and emergency medical services to a greater extent than the proposed Project. Like the proposed Project, Alternative 3 would be required to comply with applicable regulatory requirements as well as implement mitigation similar to Mitigation Measure H.2-3, which requires the Applicant to submit a plot plan for approval by the PFD prior to the issuance of a building permit. The plot plan would include fire prevention, suppression, and access features designed to reflect the Project Site's proposed occupancy levels, and would be subject to PFD approval. In addition, Alternative 3 would be required to implement mitigation similar to Mitigation Measures H.2-4 through H.2-6, which requires traffic signals in the Project area to be equipped with emergency vehicle traffic signal preemption systems, proposed buildings and the proposed subterranean parking structure to have radio coverage for emergency responders, and fire apparatus roads, respectively. Finally, Alternative 3 would be required to implement mitigation similar to Mitigation Measures H.2-7 through H.2-9 related to fire flow. Alternative 3 would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain PFD service levels. In addition, operational impacts with regard to response distance, response times, and fire flow would be less than significant under Alternative 3, but greater than the less than significant impacts identified for the proposed Project due to Alternative 3's increased residential population.

(3) Schools

Alternative 3 would develop more residential units and less commercial uses than the proposed Project and, thus, would generate more students that would attend schools within the PUSD. Based on the student generation factors used in the Draft EIR, Alternative 3 would generate approximately 285 students, which is 137 students more than forecasted for the proposed Project. As described in Section IV.H.3, Public Services, the three schools that would serve the Project Site, McKinley Elementary School, Blair High School, and John Muir High School, would have more than adequate capacity to accommodate the students generated by the proposed Project. Specifically, McKinley Elementary School has a projected capacity excess of 775 students, Blair High School has a projected capacity excess of 738 students, and John Muir High School has a projected capacity excess of 941 students. Thus, all schools would be able to accommodate the students generated under Alternative 3. Furthermore, pursuant to SB 50, the Applicant would be required to pay development fees for schools to the PUSD prior to the issuance of the Project's building permits and the payment of such fees is considered full and complete mitigation of Project-related school impacts. Given that the PUSD has adequate capacity to accommodate the students generated under the proposed Project and that development fees would offset the impact of additional student enrollment, a less than significant impact associated with Alternative 3 would occur; however, impacts would be greater than those identified for the proposed Project due to the additional students generated under this Alternative.

(4) Parks and Recreation

(a) Construction

Construction activities under Alternative 3 would result in a corresponding temporary increase in the number of construction workers, similar to the proposed Project. While there would be an increase, it is unlikely that these construction workers would relocate their households as a consequence of working on the alternative and, thus, there would not be a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site. However, there could be a temporary increase in use of nearby public parks and recreational facilities by construction workers during their lunch breaks. Similar to the proposed Project, any resulting increase in the use of such parks and recreational facilities would be temporary and would occur during off-peak park usage hours and utilize facilities that are readily available at the parks. Furthermore, it is unlikely that workers would utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site, as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Therefore, construction of Alternative 3 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services and

impacts on parks and recreational facilities during construction would be less than significant.

(b) Operation

Alternative 3 would result in the development of 1,396 residential units and 10,000 square feet of restaurant uses. Development of 1,396 residential units would create an on-site population of approximately 2,848 persons, which would be 1,879 persons more than the proposed Project. In addition, commercial development would generate approximately 25 new employees, which would be 2,480 employees less than what is forecasted for the proposed Project. The population increase associated with Alternative 3 would generate additional demand for parks and recreational facilities in the vicinity of the Project Site; and this increase would be greater than what was evaluated for the proposed Project, because residents create a much greater demand for park facilities than employees. Furthermore, like the proposed Project, Alternative 3 would provide on-site open space and residential amenities to serve the recreational needs of residents, employees, and guests. Due to the amount, variety, and availability of the proposed on-site open space and recreational amenities, it is anticipated that residents and employees would utilize the on-site open space areas to meet their passive recreational needs and the use of off-site public parks and recreational facilities by residents and employees for passive recreational purposes would be reduced. However, for active recreational facilities residents would most likely utilize nearby existing parks in the vicinity of the Project Site as well as the special recreational facilities and amenities found with Memorial Park, Central Park, and the Lower Arroyo Park.

As described in Section IV.K.4, the City has a park per resident standard of 2.73 acres of parkland per 1,000 residents. The ratio within a half mile of the Project Site with the development of the proposed Project is 1.81 acres of parkland per 1,000 residents. While this number is lower than the citywide ratio, the Project Site has two neighborhood parks (Memorial Park and Central Park) within 0.2 mile of the Project Site. Thus, the City's goal of having a neighborhood park or facility within a half mile walk is being met by Alternative 3. Furthermore, similar to the proposed Project, Alternative 3 would be subject to the Residential Impact Fee Ordinance, which based on City policy mitigates a project's impact on City parks and recreational facilities. Therefore, given the on-site open space, the nearby active recreational facilities, and the payment of the City's Residential Impact Fee, impacts as a result of development of Alternative 3 would be considered less than significant, but greater than the less than significant impacts identified for the proposed Project due to the increase in residential population.

(5) Libraries

(a) Construction

Similar to the proposed Project, there would be a temporary increase in the number of construction workers during construction of Alternative 3. While there would be an increase, it is unlikely that these construction workers would relocate their households into the City as a consequence of working on the alternative and, thus, there would not be a corresponding increase in the permanent demand for library services in the vicinity of the Project Site. Furthermore, it is unlikely that construction workers would utilize Project area libraries on their way to/from work or during their lunch hours. Construction workers would likely utilize library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. Additionally, it is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in the usage of libraries by construction workers is anticipated to be negligible and impacts on library facilities during construction of Alternative 3 would be less than significant.

(b) Operation

Development under Alternative 3 would result in an on-site residential population of approximately 2,848 persons, which would be 1,879 persons more than the proposed Project. In addition, commercial development would generate approximately 25 new employees, which would be 2,480 employees less than what is forecasted for the proposed Project. The Central Library's current service population is approximately 140,000 persons and is anticipated to increase to approximately 141,137 persons by 2016. With the addition of Alternative 3's estimated 2,848 residents, the service population would increase to 143,985 persons, which is more than would be generated under the proposed Project. As the Central Library is not currently experiencing any library service deficiencies and is positioned to absorb additional library use, Alternative 3 would not exceed the capacity of local libraries to adequately serve the community and impacts would be less than significant. However, Alternative 3 impacts would be greater than those identified for the proposed Project due to the additional population under this alternative.

m. Utilities

(1) Water Supply

(a) Construction

As with the proposed Project, construction activities associated with Alternative 3 would generate a limited and temporary water demand during construction. This temporary water demand would be similar under Alternative 3 as compared to the Project due to the similar amount of grading and dust control that would be required. Construction activities associated with the proposed Project would result in a limited and temporary water demand and are not anticipated to have any adverse impact on water supply and infrastructure. Like the proposed Project, Alternative 3 would be required to implement measures similar to Regulatory Compliance Measure L.1-1, which addresses the determination that the water conveyance system is adequate. In addition, to the extent the improvements are required for the water lines that directly serve the Project Site, the Applicant would be required to construct the improvements as part of the Alternative's overall construction process. Therefore, construction impacts on water supply and infrastructure would be less than significant under Alternative 3 and similar to the less than significant impacts identified for the proposed Project.

(b) Operation

Development of Alternative 3 would result in an overall increase in water demand from the Project Site during operation. As shown in Table V-3 on page V-75, Alternative 3 is forecasted to consume approximately 311,862 gallons of water per day, which is approximately 3.7 percent more than the water that would be consumed by the proposed Project, which is forecasted to consume approximately 300,840 gallons of water per day. This analysis of Alternative 3 also assumes that water conservation measures similar to those of the proposed Project (including the 5-percent reduction for passive water conservation and compliance with several PMC requirements), as applicable, would be implemented. While Alternative 3 represents a very different land use mix than the proposed Project, the residential growth that would occur under Alternative 3 would be consistent with the upper limit for residential development in the Central District as set forth in the General Plan Land Use Element. As Alternative 3 would be consistent with the general plan's land use projections, it would have been accounted for in PWP's forecast of future water demand in the City. With respect to infrastructure, similar to the proposed Project, the necessary water distribution lines and connections to the PWP's system would be constructed under Alternative 3 in conformance with the City's requirements. Furthermore, Alternative 3 would be required to implement measures similar to Regulatory Compliance Measure L.1-1, which requires that Alternative 3 would be served by adequate water lines. Like the Project, in the event that the improvements are needed with regard to

Table V-3
Estimated Alternative 3 Water Consumption Forecast

Type	Size	Employee/ sf	Number of Employees	Water Use (gal/emp/day)	Average Daily Demand (gal/day)
Restaurant	*10,000 sf*	*1/400*	*25*	*78 gal/emp/day*	*1,950*
Residential	1,396 units	N/A	N/A	222 gal/unit	309,912
Alternative 3 Total					**311,862**
Project Total					**300,840**
Compared to Project					**+3.7%**

sf = square feet
emp = employees
gal = gallons
Source: Matrix Environmental, 2014.

the water lines that connect to those that are located adjacent to the Project Site, the Applicant would pay the City's water main charge for Alternative 3 in accordance with Sections 13.20.080 and 13.28.010 of the PMC. Therefore, impacts on water supply and infrastructure associated with operation of Alternative 3 would be less than significant, but greater than the less than significant impacts identified for the Project.

(2) Sewer

(a) Construction

As with the proposed Project, construction activities associated with Alternative 3 would result in a temporary increase in sewage generation as a result of construction workers on-site. The sewage flows that would be generated during construction of Alternative 3 would be similar to the proposed Project due to the similar amount of development. As construction of the proposed Project is not anticipated to generate sewage flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated by the Sanitation Districts of Los Angeles County, the same conclusion would apply to Alternative 3. The impacts with respect to traffic, air quality, noise, and emergency access resulting from the installation of any off-site infrastructure under Alternative 3 have been considered in the respective analyses of Alternative 3. In addition, when considering impacts resulting from the installation of any required sewer infrastructure under Alternative 3, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete, as with the proposed Project. Therefore, impacts on

sewage infrastructure and treatment associated with construction activities would be less than significant under Alternative 3 and similar to the less than significant impacts identified for the proposed Project.

(b) Operation

The Project Site is served by the City's local wastewater system, owned by the City and operated by the Department of Public Works Engineering Division. Wastewater generated from the Project Site is treated at the Whittier Narrows WRP or the Los Coyotes WRP. Alternative 3 would result in an overall increase in sanitary sewage flows from the Project Site during operation. Sewer flows are conservatively calculated as 85 percent of the water demand. As calculated above, Alternative 3 is estimated to consume approximately 311,862 gallons of water per day, which is approximately 3.7 percent more than the water that would be consumed by the proposed Project (i.e., 300,840 gallons of water per day). As such, Alternative 3 is forecasted to generate an average daily sewage flow of 265,083 gallons per day, which is approximately 3.7 percent more than the daily sewage flow that would be generated by the proposed Project (i.e., 255,714 gallons per day). While sewage flows are slightly greater under Alternative 3, the flow levels are sufficiently similar to those of the proposed Project that it is anticipated that the City's local wastewater system would also be able to accommodate the infrastructure demand of Alternative 2. Thus, sewer infrastructure impacts under Alternative 3, as is the case with the proposed Project, would be less than significant. As with the Project, sewer facility charges would be paid in accordance with Chapter 4.53 of the PMC. In addition, it is anticipated that the Whittier Narrows WRP and the Los Coyotes WRP would be able to accommodate the daily sewer flow, conservatively forecasted at 0.27 million gallons per day, generated by Alternative 3. Therefore, operational impacts on sewage infrastructure and treatment would be less than significant under Alternative 3 and greater than the less than significant impacts identified for the proposed Project.

(3) Solid Waste

(a) Construction

As with the proposed Project, construction activities associated with Alternative 3 would result in a temporary increase in the generation of solid waste. The solid waste that would be generated during construction of Alternative 3 would be similar to the proposed Project due to the similar amount of development. As construction of the Project would not have any adverse impact on landfill capacity, the same conclusion would apply to Alternative 3. Therefore, impacts on solid waste associated with construction activities would be less than significant under Alternative 3 and similar to the less than significant impacts identified for the proposed Project.

(b) Operation

Solid waste generated in the City is primarily disposed of at the Scholl Canyon landfill. Alternative 3 would result in an overall increase in the generation of solid waste from the Project Site during operation. As shown in Table V-4 on page V-78, Alternative 3 is estimated to generate approximately 3,196.3 tons of solid waste per year, which is approximately 67.5 percent more than the solid waste that would be generated by the proposed Project, which is anticipated to generate approximately 1,908.5 tons of solid waste per year. As with the Project, it is important to note that this estimate is conservative, in that the amount of Alternative 3's solid waste that would need to be landfilled would likely be less than this forecast based on successful City implementation of Assembly Bill 939 (AB 939). Nonetheless, as AB 939 does not contain requirements for individual development projects, it was conservatively assumed that all operational solid under Alternative 3 and greater than the less than significant impacts identified for the proposed Project.

n. Energy Resources

(1) Construction

While there is a difference in the types of land uses to be developed under Alternative 3, compared to the proposed Project, the types of construction activities required for this alternative would be similar to the proposed Project given that the footprint and scale of development would remain unchanged. While petroleum-based fuels would be consumed by construction vehicles and other energy-consuming equipment, consumption would be similar to the proposed Project. As such, like the proposed Project, Alternative 3 would be required to comply with mitigation measures designed to reduce the consumption of energy resources such as those identified in Section IV.F, Air Quality, which would reduce the Project's reliance on petroleum-based fuels during construction activities. Thus, consumption of petroleum-based fuels would not be expected to have an adverse impact on available supplies. In addition to petroleum-based fuels, electricity would be consumed during conveyance of the water used for construction. Like the proposed Project, construction activities associated with Alternative 3 would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies. Finally, like the proposed Project, Alternative 3 would involve the use of construction materials that contain bound energy. As such, Alternative 3 would be required to implement energy efficiency measures such as Project Design Feature G-1 and Regulatory Compliance Measure E-1 of the Draft EIR, which would also result in the use of sustainable materials and recycled content that would reduce energy consumption during Project construction. Therefore, like the proposed Project, Alternative 3 would not result in the inefficient use of energy resources, create energy utility system capacity problems, create problems with the provision of energy services, or result in a significant impact associated with the construction of new or expanded energy facilities. As such, impacts would be less than significant and less than the less than significant impacts identified for

Table V-4
Estimated Alternative 3 Solid Waste Generation

Type	Size	Employee/ sf	Number of Employees	Solid Waste Generation[a]	Total (tons/year)
Restaurant	10,000 sf	1/400	25	6,437 lbs/emp[b]	80.5
Residential	1,396 units	N/A	N/A	4,463.9 lbs/household/yr[c]	3,115.8
Alternative 3 Total					**3,196.3**
Project Total					**1,908.5**
Compared to Project					**+67.5%**

sf = square feet

emp = employees

yr = year

[a] *Unless otherwise specified, generation rates based on June 2006 Targeted Statewide Waste Characterization Study: Waste Disposal and Diversion Findings for Selected Industry Groups prepared for California Integrated Waste Management Board.*

[b] *Restaurant solid waste generation factor is for a full-service restaurant.*

[c] *Residential solid waste generation factor based on 12.23 lbs per household per day as set forth in City of Los Angeles CEQA Thresholds Guide.*

Source: Matrix Environmental, 2014.

the proposed Project as Alternative 3's demand for energy during peak energy demand periods would be less.

(2) Operation

During operation of Alternative 3, energy would be consumed for multiple purposes, similar to those identified for the proposed Project. While Alternative 3 would increase energy usage on the Project Site, it would be similar to the increase in energy consumption identified for the proposed Project. Furthermore, like the proposed Project, Alternative 3 would be required to implement a variety of measures designed to reduce energy consumption such as Regulatory Compliance Measure G-1 and Project Design Feature G-2 of this Draft EIR, which require compliance with the various provisions of the 2013 CALGreen Code and prohibits the installation of hearths, respectively. Additionally, PWP's energy demand forecasts are anticipated to account for development of this alternative. Thus, Alternative 3 would be within the demand forecasted within PWP's planning area and would not create energy utility system capacity constraints or require the construction of new or expanded energy facilities beyond what is already anticipated by the City. Furthermore, like the proposed Project, Alternative 3 would result in an increase in VMT and, consequently, an increase in the consumption of petroleum-based fuels; however, this increase would be similar to the proposed Project and, thus, would include measures to

facilitate a reduction in VMT and energy consumption. Therefore, like the proposed Project, while operation of Alternative 3 would increase overall energy use on the Project Site, usage would be reduced through the implementation of the aforementioned regulatory compliance measures and project design features. Therefore, Alternative 3 would not result in the inefficient use of energy resources, create energy utility system capacity problems, create problems with the provision of energy services, or result in a significant impact associated with the construction of new or expanded energy facilities. As such, Alternative 3's impacts would be less than significant and similar to the less than significant impacts identified for the proposed Project.

2. Comparison of Impacts

The Alternative Land Use Alternative would result in the same significant impacts as the proposed Project (i.e., significant traffic impact at the Fair Oaks Avenue/Walnut Street intersection, regional construction and operational air quality emissions, and cumulative construction noise). In addition, the Alternative Land Use Alternative would result in greater impacts than the proposed Project with regard to land use compatibility, police protection, fire protection, schools, parks and recreation, libraries, water supply, wastewater, and solid waste. Impacts associated with the remaining environmental issues would be similar to or less than those of the proposed Project.

3. Relationship of the Alternative to Project Objectives

Overall, Alternative would meet some of the Project's objectives. Development proposed under Alternative 3 would consist primarily of residential uses with a relatively limited amount of restaurant floor area. This alternative would not include commercial office or retail uses and, thus, would not meet the objective that seeks to transform the existing suburban style campus into a pedestrian-oriented, higher-density development with a mix of uses. Furthermore, Alternative 3 would not meet the Project objectives with regard to providing Class "A" office space to stem the loss of existing Pasadena businesses and attract new companies to the City. Like the proposed Project, Alternative 3 would create new buildings and open spaces that are compatible with Old Pasadena's architecture and the existing Parsons building. In addition, Alternative 3 would facilitate a pedestrian oriented environment by providing public spaces and pathways, by improving and extending Holly Street, and would visually link the Project Site to City Hall to a greater extent than under current conditions, in accordance with the Bennett Plan.

V. Alternatives

D. Alternative 4: Alternative Design—Flip Residential/Commercial Land Uses on Fair Oaks Avenue

1. Environmental Impact Analysis

a. Land Use

(1) Land Use Consistency

Alternative 4 would develop the same types and mix of land uses on the Project Site, but with a different physical arrangement of uses on Fair Oaks Avenue. Like the Project, Alternative 4 would include a PD Permit to establish development standards that outline how development on-site would occur (e.g., maximum FAR, setbacks, mix of uses, parking, etc.). Alternative 4 would also include design and building articulation standards that incorporate the corresponding standards set forth in the Central District Specific Plan Design Guidelines. Therefore, like the Project, Alternative 4 would be substantially consistent with applicable land use goals and policies in the General Plan Land Use Element, Central District Specific Plan (including the Specific Plan Design Guidelines), and Pasadena Zoning Code. However, by locating commercial office and restaurant uses closer to Old Pasadena and residential uses farther from Old Pasadena along the Fair Oaks Avenue frontage, Alternative 4 would provide for less intermixing of land uses as compared to the Project, and more of a transitional zone between separate commercial and residential areas. Nonetheless, overall, impacts with regard to land use consistency would be less than significant and similar to those of the Project.

(2) Land Use Compatibility

The types and amounts of land uses would be the same under Alternative 4 as the Project, but with a different physical arrangement of uses on Fair Oaks Avenue. Therefore, the relationships with surrounding land uses throughout the majority of the Project Site would be substantially similar under Alternative 4 and the Project. Similar to the Project, Alternative 4 would transform a suburban office complex to an urban campus that includes office, retail, restaurant and residential uses. The new types of land uses would be compatible with other land uses in the Project vicinity. Like the Project, Alternative 4 would improve existing on-site conditions to more closely resemble the traditional urban street

pattern of buildings located east and south of the Project Site in Old Pasadena by introducing pedestrian-friendly spaces, a varied mix of land uses, and an activated urban street front. However, by locating commercial office and restaurant uses closer to Old Pasadena and residential uses farther from Old Pasadena along the Fair Oaks Avenue frontage, Alternative 4 would provide for less intermixing of land uses as compared to the Project, and more of a transitional zone between separate commercial and residential areas. Nonetheless, overall, impacts with regard to land use compatibility would be less than significant and similar to those of the Project.

b. Transportation

As with the proposed Project, construction of Alternative 4 would generate vehicle trips associated with construction worker travel, excavation and hauling operations, and the delivery of construction materials to the Project Site. As the land uses developed under Alternative 4 would be the same as those of the proposed Project, construction traffic impacts under Alternative 4 would be similar to those of the proposed Project. With the implementation of a construction traffic management plan, like the proposed Project, construction traffic impacts would be reduced to a less than significant level.

The following discussion is based on the traffic analysis for the Project alternatives provided in Section XII of the Transportation Study for The Lincoln Properties Project—100 W. Walnut Street EIR (hereinafter the “Traffic Study”), which is included in Appendix B of this Draft EIR.

(1) Regional Transportation System (Freeways)

Under Alternative 4, the land use development program would be the same as the proposed Project and, thus, freeway-related vehicle trips to and from the Project Site would also be the same. As such, the impacts of Alternative 4 would be the same as the proposed Project with regard to the freeway system. Specifically, Alternative 4 and the proposed Project would result in less than significant impacts at all of the analyzed freeway mainline segments, freeway on-ramps, and freeway off-ramps during both the morning and evening peak hours.

(2) Intersections

Shifting the location of the on-site commercial and residential uses along Fair Oaks Avenue results in a minor redistribution of traffic at a few of the analyzed intersections, principally the intersections that border the North Development Area. Beyond this limited geography, the intersection impacts of Alternative 4 are the same as the proposed Project. However, the redistribution in traffic that occurs under Alternative 4 changes the

significance conclusions regarding intersection impacts before mitigation. Specifically, Alternative 4 would result in significant traffic impacts at three intersections during the A.M. peak hour and four intersections during the P.M. peak hour, compared to four intersections during the A.M. peak hour and five intersections during the P.M. peak hour under the proposed Project. The additional significant A.M. and P.M. peak hour impacts that occur under the proposed Project occur at the Fair Oaks / Holly Street and Pasadena Avenue/Walnut Street intersections, respectively. Like the proposed Project, with the implementation of the Project's transportation mitigation measures, all intersection impacts would be reduced to less than significant for Alternative 4 with the exception of the Fair Oaks Avenue/Walnut Street intersection. While a significant impact would occur at this intersection under Alternative 4, as is the case with the proposed Project, the volume-to-capacity (V/C) ratio before mitigation at this intersection would be reduced from 0.901 (LOS E) under the proposed Project to 0.894 (LOS D) under Alternative 4 in the P.M. peak hour. As the number of intersections significantly impacted before mitigation under Alternative 4 is less than that of the Project and the level of impact under Alternative 4 is also less at the Fair Oaks Avenue/Walnut Street intersection, intersection impacts under Alternative 4 would be less than those of the proposed Project.

(3) Street Segments

Like the proposed Project, Alternative 4 would increase daily traffic on 11 street segments by 5 to 7.4 percent and on nine street segments by greater than 7.4 percent. Thus, impacts under Alternative 4 would be the same as those identified for the proposed Project. This increase in daily traffic is considered a potentially significant impact. As is the case with the proposed Project, under Alternative 2, funds would be paid into the Neighborhood Traffic Management Capital Improvement Program Fund to implement traffic management measures to protect neighborhoods potentially influenced by the traffic generated by Alternative 2. However, as is case with the proposed Project, DOT has determined that there are no feasible mitigation measures available to reduce segment impacts to below levels of significance (i.e., widening and/or other physical improvements would be in direct conflict with City policies relative to transportation system enhancements that are sustainable and enhance livability within the City). Thus, Alternative 4 impacts on street segments would be significant and similar to the significant impacts of the proposed Project.

(4) Congestion Management Plan

As with the proposed Project, Alternative 4 would not add 150 or more new trips per hour to the CMP mainline freeway monitoring stations or add more than 50 trips to any CMP arterial monitoring location. As Alternative 4 would generate the same number of peak hour trips as the proposed Project, Alternative 4 impacts with regard to CMP freeway and arterial facilities would be the same as the less than significant impacts identified for

the proposed Project. Further, Alternative 4 would also generate the same number of transit trips as the proposed Project, and therefore transit impacts under Alternative 4 would be less than significant, as is the case with the proposed Project.

c. Parking

Like the proposed Project, Alternative 4 would provide a total of 4,244 parking spaces within the North Development Area. As the overall development program and amount of parking under Alternative 4 is the same as the proposed Project, Alternative 4, as is the case with the proposed Project, would provide parking facilities that exceed the combined total of the code required parking for all of the new land uses that would be developed under Alternative 4 as well as replacement parking for every existing parking space that would be displaced by new development. As a result, Alternative 4 would have a less than significant parking impact that would be similar to the Project's less than significant parking impact.

d. Aesthetics, Visual Character, and Views

(1) Construction

Similar to the proposed Project, construction activities associated with Alternative 4 would temporarily alter the visual appearance of the Project Site and surrounding area due to the removal of the surface parking areas. Other construction activities, such as site preparation and grading, the staging of construction equipment and materials, and the construction of new structures also would alter temporarily the visual quality of the Project Site and adjacent roadways. Like the proposed Project, Alternative 4 would be required to comply with mitigation measures, such as the use of temporary construction fencing to screen much of the construction activity from view at the street level and graffiti removal. Compliance with such measures would ensure that impacts to aesthetics/visual quality during construction of Alternative 4 would be less than significant, and equivalent to the less than significant impacts of the proposed Project.

In addition to construction activities, like the proposed Project, development of Alternative 4 would include the removal of existing on-site trees within Development Areas A, B, and C and the potential removal of existing street trees adjacent to the Project Site along Walnut Street, Pasadena Avenue, and Holly Street. The removal of these trees would temporarily reduce the visual quality of the Project Site as well as these streets during the construction phase of the alternative; however, this impact would only occur until the replacement of the street trees occurs and the new on-site landscaping is installed. Thus, like the proposed Project, replacement of these trees would ultimately improve the streetscape in the Project area. Given that removal would be temporary and would not

substantially alter or degrade the existing visual character of the area, impacts to the visual character of the Project Site from development of Alternative 4 would be less than significant.

With regard to view obstruction, like the proposed Project, there are four notable views (i.e., San Gabriel Mountains, Old Pasadena, City Hall, and St. Andrew Church bell tower) that could be affected during construction of Alternative 4. Alternative 4 would be developed in accordance with the same development standards as the proposed Project. As the proposed Project would not obstruct an existing valued view, Alternative 4's impacts to views would be less than significant and equivalent to the less than significant impacts of the proposed Project.

(2) Operation

Similar to the proposed Project, the transition of the Project Site from a single use office building with surrounding surface parking into a mixed-use urban campus is not an adverse change to the visual character of the Project Site and surrounding area. Like the proposed Project, Alternative 4 would also implement the City's Citywide Design Principles and Central District Design Guidelines as well as the Project's development standards, which would result in a Project design that would enhance and complement the architectural style, landscape, scale, and materials of Old Pasadena. As such, impacts related to visual character from Alternative 4 are less than significant and similar to the less than significant impacts of the proposed Project.

Alternative 4 would be developed in accordance with the same development standards as the proposed Project, except that the proposed office uses would be replaced with residential development and vice versa. As a result, Alternative 4, as is the case with the proposed Project, would improve views along the Holly Street corridor towards City Hall, would not impact views towards Old Pasadena down the Fair Oaks corridor, and would not impact views of the St. Andrew Church bell tower. With regard to views of the San Gabriel Mountains from the Fair Oaks and Pasadena Avenue corridors, building heights under Alternative 4 would be the same as the proposed Project, and thus, would result in the same limited impacts to the available views of the San Gabriel Mountains that occur under the proposed Project. As such, Alternative 4 would result in less than significant view impacts and impacts that are similar to the less than significant impacts identified for the proposed Project.

e. Light/Glare and Shading

(1) Light/Glare

(a) Construction

Like the proposed Project, construction activities associated with Alternative 4 would involve the use of various lighting sources which have the potential to spillover to off-site sensitive land uses in the vicinity of the Project Site, although the extent of this impact would be reduced through compliance with PMC Section 9.36.70, which limits the hours of construction. In addition, like the proposed Project, Alternative 4 would implement project design features that include provisions for nighttime lighting to be shielded and/or aimed so that no direct lightbeam spills over outside of the Project Site boundary. Compliance with these measures would ensure that impacts to off-site sensitive uses from lighting sources during construction of Alternative 4 would be considered less than significant and similar to the less than significant impacts identified for the proposed Project.

In addition to impacts from lighting sources, construction activities associated with Alternative 4 also has the potential to result in daytime glare impacts. Like the proposed Project, it is unlikely that such impacts would occur, given the fact that large, flat surfaces, like those needed to generate glare, are typically not associated with construction activities and that any glare produced would be highly transitory and short-term. In addition, Alternative 4 would comply with project design features, like the proposed Project, which would require the shielding of construction related light sources. Furthermore, like the proposed Project, the potential for nighttime glare is considered negligible since construction would mainly occur during daytime hours and lighting during nighttime hours would be designed to comply with the limitations described above. Considering the limited glare sources and that Alternative 4 would comply with the appropriate project design measures, impacts to off-site sensitive uses from daytime and nighttime glare during construction would be considered less than significant and similar to those of the proposed Project.

(b) Operation

Similar to the proposed Project, Alternative 4 would install new lighting sources and would introduce new sources of glare, such as building lighting, security lighting, street lights, and signage lighting, as well as from increased vehicle trips in the Project area. While Alternative 4 would increase light levels at the Project Site compared to existing conditions, the change in the location of the residential and commercial uses along Fair Oaks Avenue would not have a substantive change in overall site lighting conditions. However, it is likely that light levels under Alternative 4 within the southern half of the Fair Oaks Avenue frontage would be somewhat higher than under the proposed Project as

lighting related to commercial uses tends to be somewhat higher than lighting associated with residential uses. The opposite of this would be the case along the northern half of the Fair Oaks frontage where relatively lower light levels would occur under Alternative 4 as residential uses would replace the commercial uses that are proposed for this area under the proposed Project. To reduce light and glare impacts, Alternative 4, like the proposed Project, would be required to implement regulatory compliance measures and project design measures which would ensure that appropriate lighting sources and building materials would be installed throughout the Project Site. Adherence to these measures would ensure that impacts associated with new light and glare sources are less than significant and similar to the less than significant impact identified for the proposed Project.

(2) Shading

Under Alternative 4, the development standards, including the heights of development throughout the Project Site would remain the same as the those identified for the proposed Project and, thus, would result in similar impacts. The analysis of the proposed Project identified less than significant impacts to shade-sensitive uses during the winter and summer solstices and the spring and fall equinoxes which would also occur under Alternative 4. Thus, impacts as a result of Alternative 4 would be less than significant and similar to the less than significant impact identified for the proposed Project.

f. Cultural Resources

(1) Historic Resources

As with the Project, no impacts to on-site historic resources would occur under Alternative 4 because there are no historically significant buildings, structures, objects, or sites located within the Project Site.

Off-site historic resources comprised of contributing buildings to the Old Pasadena Historic District are located south of the Project Site on the south side of Union Street and east of the Project Site on the east side of Fair Oaks Avenue. As with the Project, Alternative 4 would not have the potential to alter the immediate surroundings of historic resources south of the Project Site on Union Street because no new buildings would be developed in Development Area E. Development along Fair Oaks Avenue would consist of the same types and mix of land uses as the Project, except with the commercial office uses and restaurant uses located in the southern portion of the North Development Area's Fair Oaks Avenue frontage and the residential uses located in the northern portion of the North Development Area's Fair Oaks Avenue frontage. As with the Project, Alternative 4 would be governed by the Central District Specific Plan Design Guidelines which provide measures to ensure, among other things, that new developments within the Central District

"respect the surrounding character" through "proper consideration of scale, massing, and detail of individual buildings." Similar to the Project, Alternative 4 would include setback and building articulation standards that incorporate the corresponding standards set forth in the Central District Specific Plan Design Guidelines. Therefore, like the Project, Alternative 4 would result in new construction that is compatible with the overall character of the Historic District, and the integrity of the District would not be materially impaired by alterations to its setting caused by development within the Project Site. Overall, impacts to historic resources would be less than significant, similar to those of the Project.

(2) Archaeological and Paleontological Resources

Under Alternative 4, impacts related to archaeological and paleontological resources would be similar to those of the proposed Project given that similar amounts of development and ground disturbance would occur. Like the proposed Project, this alternative would be in a region where archaeological resources are known to occur. As such, although no archaeological and paleontological resources have been recorded on-site, the possibility remains that previously undiscovered subsurface prehistoric or historic-era archaeological and paleontological resources could be encountered during earth-moving construction activities, which is a potentially significant impact. Furthermore, like the proposed Project, it is possible that the Project Site contains undocumented human remains, the disturbance of which would constitute a significant impact. Given these potential impacts, Alternative 4 would be required to implement mitigation similar to Mitigation Measures IV.D.2-1 through IV.D.2-13, which requires procedures to follow should there be a discovery of archaeological resources, paleontological resources, and/or human remains. Implementation and compliance with such mitigation measures would reduce potentially significant impacts to a less than significant level, similar to the proposed Project.

g. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the proposed Project, construction of Alternative 4 would generate pollutant emissions through the use of heavy-duty construction equipment and through haul truck and construction worker trips. The overall amount of site preparation and building construction would be the same under this alternative compared to the proposed Project due to the same types of uses and amount of square footage to be developed under Alternative 4. Pollutant emissions from construction activities would be the same on a daily basis, as the duration and the intensity of these activities would be the same compared to the proposed Project. Thus, overall construction emissions generated by Alternative 4 would be the same as those of the proposed Project over the construction period. Impacts

during maximum conditions, those used for measuring significance, would be the same as those of the proposed Project. As such, similar to the proposed Project, regional emissions would be significant and unavoidable even with the incorporation of mitigation measures.

Localized pollutant construction impacts also would be the same as the proposed Project since the intensity of excavation would be the same. Therefore, as with the proposed Project localized emissions would be less than significant for Alternative 4 and such impacts would be the same as those of the proposed Project.

(b) Toxic Air Contaminants

With respect to construction air toxics, diesel particulate emissions associated with heavy equipment operations during grading and excavation activities represent the greatest potential for TAC emissions. As noted above, the construction emissions generated by Alternative 4 would be the same as those of the proposed Project over the construction period and, thus, would result in the same amount of diesel particulate emissions. In addition, as with the proposed Project, there would be no residual emissions after construction and corresponding individual cancer risk. Therefore, like the proposed Project, construction-related air toxic emission impacts of Alternative 4 would be less than significant and the same as those of the proposed Project.

(c) Odors

As with the proposed Project, Alternative 4 would have the potential to produce odors during construction associated with the operation of construction equipment, the application of asphalt, the application of architectural coatings and other interior and exterior finishes, and roofing. However, like the proposed Project, any odors produced during construction of Alternative 4 would dissipate away from the construction area and would be quickly diluted. Thus, as with the proposed Project, impacts associated with objectionable odors during construction would be less than significant.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Alternative 4 would result in the same amount of development as the proposed Project; however, land uses in Development Areas A and B would be reversed. Since there would be no change in the amount of development, regional and localized operational emissions would be the same as the proposed Project. Regional operational emissions under Alternative 4 would be the same as those of the proposed Project, and like the proposed Project would be significant and unavoidable even with the incorporation of mitigation measures and less than significant for localized operational emissions.

Localized operational impacts are also determined by the peak-hour intersection traffic volumes. The localized CO hotspot analysis for the proposed Project did not result in any significant localized CO impacts and impacts were well below the significance thresholds. Since Alternative 4 would result in the same traffic volumes, similar to the proposed Project, localized impacts would be less than significant under this alternative.

(b) Toxic Air Contaminants

The primary sources of potential air toxics associated with proposed Project operations would include diesel particulate matter from delivery trucks and emergency backup generators, and to a lesser extent, natural gas equipment such as a boiler. As with the proposed Project, Alternative 4 would involve the installation of an additional back-up diesel powered emergency generator. Also, with the same amount of development as the proposed Project, Alternative 4 would result in the same operational diesel particulate matter emissions associated with truck deliveries. Thus, similar to the proposed Project, this alternative would result in a less than significant air quality impact associated with air toxics and such impacts would be similar compared to the proposed Project.

With the location of Development Areas A and B reversed, Alternative 4 could potentially locate proposed residential units within 500 feet of a freeway and would be considered inconsistent with the CARB and SCAQMD guidelines for the placement of new sensitive land uses in close proximity to potential sources of TACs. Therefore, Alternative 4 could result in a significant TAC impact and expose proposed residential uses to a cancer risk that would exceed the SCAQMD significance threshold of 10 in one million. However, with implementation of mitigation it is anticipated that Alternative 4 impacts would be reduced to less than significant. While Alternative 4 would result in a less than significant impact, its TAC impact would be greater than the less than significant impact of the proposed Project.

(c) Odors

As with the proposed Project, this Alternative would not include any uses identified by the SCAQMD as being associated with odors. Therefore, similar to the proposed Project, potential odor impacts would be less than significant under this Alternative and would be the same as those of the proposed Project due to the same types of land uses and the same building square footage.

h. Climate Change

Similar to the proposed Project, this Alternative would be consistent with the growth projections set forth in the City's General Plan Land Use Element for the Central District.

These growth projections are reflected in SCAG's forecasts as the designated MPO and provided for incorporation into CARB's *Climate Change Scoping Plan* (e.g., 2020 BAU employment and population growth rates). As with the proposed Project, Alternative 4 would incorporate numerous project design features to reduce GHG emissions and would be designed to meet the criteria for LEED Silver designation. With consideration of this alternative's design features to reduce cumulative GHG, Alternative 4 would emit the same amount of GHG emissions as the proposed Project due to the same number of daily trips and building square footage relative to the proposed Project. By incorporating energy and vehicle trip reducing features and mitigation measures, such as designing, constructing, and operating the proposed Project to meet LEED Silver certification, Alternative 4 would be the same as the proposed Project and would result in a reduction in GHG emissions from "business-as-usual" consistent with the goals of the State of California and City of Pasadena and is considered less than significant. Such impacts would be the same as those of the proposed Project.

i. Noise and Vibration

(1) Construction

(a) Noise

Like the proposed Project, construction activities associated with the development of Alternative 4 have the potential to generate noise and vibration impacts through the use of construction equipment as well as from construction traffic. Development of Alternative 4 would involve the same stages of construction, including demolition and shoring/excavation stages. Reversing the location of the residential and commercial uses along the Project Site's Fair Oaks Avenue frontage would not result in construction noise levels that are materially different than what would occur under the proposed Project. As such, Alternative 4 would result in less than significant construction noise impacts at a Project-level but a significant impact on a cumulative basis. These impacts are similar to those of the proposed Project.

In addition to on-site construction noise sources, Alternative 4 would generate off-site construction noise from sources such as materials delivery, concrete mix, haul trucks (trucks), and construction worker vehicles. As Alternative 4's off-site construction truck trips would be the same as those of the proposed Project, impacts under Alternative 4 would be less than significant and similar to those of the proposed Project.

(b) Vibration

Alternative 4 would involve the same construction activities as the proposed Project. As such, vibration impacts under Alternative 4 would be the same as those of the proposed

Project. Therefore, Alternative 4 vibration impacts associated with potential building damage and human annoyance during construction activities would be less than significant.

(2) Operation

Alternative 4, as is the case with the proposed Project, would result in on-site stationary noise, off-site mobile noise, and composite noise level impacts. Reversing the location of the residential and commercial uses along the Project Site's Fair Oaks Avenue frontage would not result in operational noise levels that are materially different than what would occur under the proposed Project. Like the proposed Project, Alternative 4 would be required to implement regulatory compliance measures and project design features like those proposed for the Project, to ensure that noise impacts from on-site noise sources are reduced to a less than significant level, similar to the proposed Project.

As the types of land uses and building square footage to be developed under Alternative 4 and the proposed Project are the same, the number of vehicle trips generated by Alternative 4 would be the same as the proposed Project. The minor redistribution of vehicle trips that occurs under Alternative 4 would not result in off-site vehicular noise levels that are materially different than those forecasted to occur under the proposed Project. As such, off-site traffic noise impacts associated with Alternative 4 would be less than significant and similar to the proposed Project.

j. Hydrology

Impacts associated with hydrological conditions at the Project Site result from the amount and types of construction activities as well as the types of land uses and the amount of development occurring at the Project Site. As Alternative 4 includes the same types of land uses and the same building square footage as the proposed Project, reversing the location of the commercial and residential uses along the Project Site's Fair Oaks Avenue frontage would not affect the hydrological conditions that were forecasted to occur at the Project Site during construction and operations of the proposed Project. As the analysis of the Project's hydrological impacts concluded that with the implementation of all regulatory compliance measures, impacts with regard to surface water and groundwater hydrology as well as surface water and groundwater quality would be less than significant, the same less than significant impacts would also occur under Alternative 4.

k. Hazards and Hazardous Materials

Impacts with regard to hazards and hazardous materials result from the amount and types of construction activities as well as the types of land uses and the amount of

development occurring at the Project Site. As Alternative 4 includes the same types of land uses and the same building square footage as the proposed Project, reversing the location of the commercial and residential uses along the Project Site's Fair Oaks Avenue frontage would not affect conditions with regard to hazards and hazardous materials that were forecasted to occur at the Project Site during construction and operation of the proposed Project. As the analysis of the Project's hazards and hazardous materials impacts concluded that with the implementation of all regulatory compliance and mitigation measures, impacts associated with the transport, use, storage, and management of hazardous materials and hazardous waste management would be less than significant, the same less than significant impacts would also occur under Alternative 4.

l. Public Services

Impacts with regard to the provision of public services (i.e., police protection, fire protection, schools, parks and recreation and libraries) result from the amount and types of construction activities as well as the types of land uses and the amount of development occurring at the Project Site. As Alternative 4 includes the same types of land uses and the same building square footage as the proposed Project, reversing the location of the commercial and residential uses along the Project Site's Fair Oaks Avenue frontage would not affect conditions with regard to public services that were forecasted to occur at the Project Site during construction and operation of the proposed Project. As the analysis of the Project's impacts with regard to public services concluded that with the implementation of all regulatory compliance and mitigation measures, impacts associated with the provision of police protection, fire protection, schools, parks and recreation and libraries would be less than significant, the same less than significant impacts would also occur under Alternative 4.

m. Utilities

Impacts with regard to the availability of utility services (i.e., water supply and infrastructure, wastewater, and solid waste) to the Project Site result from the amount and types of construction activities as well as the types of land uses and the amount of development occurring at the Project Site. As Alternative 4 includes the same types of land uses and the same building square footage as the proposed Project, reversing the location of the commercial and residential uses along the Project Site's Fair Oaks Avenue frontage would not affect conditions with regard to the availability of utilities forecasted to occur at the Project Site during construction and operations of the proposed Project. As the analysis of the Project's impacts with regard to utilities concluded that with the implementation of all regulatory compliance measures, impacts associated with the availability of water supply and infrastructure, wastewater, and solid waste would be less

than significant, the same less than significant impacts would also occur under Alternative 4.

n. Energy Resources

(1) Construction

While petroleum-based fuels would be consumed by construction vehicles and other energy-consuming equipment, consumption would be similar to the proposed Project. As such, like the proposed Project, Alternative 4 would be required to comply with mitigation measures designed to reduce the consumption of energy resources such as those identified in Section IV.F, Air Quality, which would reduce the Project's reliance on petroleum-based fuels during construction activities. Thus, consumption of petroleum-based fuels would not be expected to have an adverse impact on available supplies. In addition to petroleum-based fuels, electricity would be consumed during conveyance of the water used for construction. Like the proposed Project, construction activities associated with Alternative 4 would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies. Finally, like the proposed Project, Alternative 4 would involve the use of construction materials that contain bound energy. As such, Alternative 4 would be required to implement energy efficiency measures such as Project Design Feature G-1 and Regulatory Compliance Measure E-1 of the Draft EIR, which would also result in the use of sustainable materials and recycled content that would reduce energy consumption during Project construction. Therefore, like the proposed Project, Alternative 4 would not result in the inefficient use of energy resources, create energy utility system capacity problems, create problems with the provision of energy services, or result in a significant impact associated with the construction of new or expanded energy facilities. As such, impacts would be less than significant and similar to the less than significant impacts identified for the proposed Project.

(2) Operation

During operation of Alternative 4, energy would be consumed for multiple purposes, similar to those identified for the proposed Project. While Alternative 4 would increase energy usage on the Project Site, it would be similar to the increase in energy consumption identified for the proposed Project. Furthermore, like the proposed Project, Alternative 4 would be required to implement a variety of measures designed to reduce energy consumption such as Regulatory Compliance Measure G-1 and Project Design Feature G-2 of this Draft EIR, which require compliance with the various provisions of the 2013 CALGreen Code and prohibits the installation of hearths, respectively. Additionally, PWP's energy demand forecasts are anticipated to account for development of this alternative. Thus, Alternative 4 would be within the demand forecasted within PWP's planning area and would not create energy utility system capacity constraints or require the construction of

new or expanded energy facilities beyond what is already anticipated by the City. Furthermore, like the proposed Project, Alternative 4 would result in an increase in VMT and, consequently, an increase in the consumption of petroleum-based fuels; however, this increase would be similar to the proposed Project and, thus, would include measures to facilitate a reduction in VMT and energy consumption. Therefore, like the proposed Project, while operation of Alternative 4 would increase overall energy use on the Project Site, usage would be reduced through the implementation of the aforementioned regulatory compliance measures and project design features. Therefore, Alternative 4 would not result in the inefficient use of energy resources, create energy utility system capacity problems, create problems with the provision of energy services, or result in a significant impact associated with the construction of new or expanded energy facilities. As such, Alternative 4's impacts would be less than significant and similar to the less than significant impacts identified for the proposed Project.

2. Comparison of Impacts

The analysis presented above indicates that while there are some minor variations in impacts when the location of the residential and commercial uses along the Project Site's Fair Oaks Avenue frontage are reversed, this change in the configuration of on-site land uses does not reduce or eliminate any of the Project's significant impacts, and increases potential impacts related to exposure of future residents to Toxic Air Contaminants. As a result, Alternative 4, as is the case with the proposed Project, would result in significant impacts with regard to traffic impacts at the intersection of Fair Oaks Avenue/Walnut Street, regional construction and operational air quality emissions, and cumulative construction noise impacts. In terms of overall conclusions, the impacts of all other issues, as is the case with those referenced above, would be generally the same as the proposed Project, except for the additional potential impact related to Toxic Air Contaminant exposure.

3. Relationship of the Alternative to Project Objectives

Development proposed under Alternative 4 would be the same as under the Project with the exception of the location of the residential and commercial uses along the Project Site's Fair Oaks Avenue frontage. This change in the configuration of on-site land uses has no affect on the extent to which Alternative 4 meets the objectives of the Project. As such, Alternative 4 would meet all the objectives of the Project.

V. Alternatives

E. Alternative 5: Alternative Design—Vertical/Mixed-Use

1. Environmental Impact Analysis

a. Land Use

(1) Land Use Consistency

Alternative 5 differs from the proposed Project by relocating the proposed restaurant uses from Development Area B to replace the Project's work/live units and residential amenity area along Fair Oaks Avenue in Development Area A. As is the case with the proposed Project, residential units would be built above the ground floor along Fair Oaks Avenue in Development Area A. Like the Project, Alternative 5 would include a PD Permit to establish development standards that outline how development on-site would occur (e.g., maximum FAR, setbacks, mix of uses, parking, etc.). Alternative 5 would also include design and building articulation standards that incorporate the corresponding standards set forth in the Central District Specific Plan Design Guidelines. However, it should be noted that because Alternative 5 would eliminate the Project's proposed work/live units, the PD Permit regulations for Alternative 5 would not be inconsistent with the floor area requirements for work/live units set forth in the Zoning Code and the Central District Specific Plan, as is the case with the Project. Nonetheless, like the Project, Alternative 5 would be substantially consistent with applicable land use goals and policies in the General Plan Land Use Element, Central District Specific Plan (including the Specific Plan Design Guidelines), and Pasadena Zoning Code. Therefore, impacts with regard to land use consistency would be less than significant and similar to those of the Project.

(2) Land Use Compatibility

The primary difference between Alternative 5 and the Project is that Alternative 5 would relocate the proposed restaurant uses from Development Area B to replace the Project's work/live units in Development Area A. Therefore, the relationships with surrounding land uses throughout the majority of the Project Site (other than the Fair Oaks Avenue frontage) would be the same under Alternative 5 and the Project. Similar to the Project, Alternative 5 would transform a suburban office complex to an urban campus that includes office, restaurant and residential uses. The new types of land uses would be compatible with other land uses in the Project vicinity. Alternative 5, as is the case with the

proposed Project, would introduce pedestrian-friendly spaces, a varied mix of land uses, and an activated urban street front to the Project Site. For purposes of evaluating environmental impacts under CEQA, impacts with regard to land use compatibility under Alternative 5 would be less than significant and similar to those of the Project. However, it should be noted that from a strictly planning (not environmental) perspective, developing restaurant uses in lieu of work/live units along the Fair Oaks frontage in Development Area A would be more consistent and compatible with existing development patterns in Old Pasadena.

b. Transportation

As with the proposed Project, construction of Alternative 5 would generate vehicle trips associated with construction worker travel, excavation and hauling operations, and the delivery of construction materials to the Project Site. As the land uses developed under Alternative 4 would be the same as those of the proposed Project, construction traffic impacts under Alternative 5 would be similar to those of the proposed Project. With the implementation of a construction traffic management plan, like the proposed Project, construction traffic impacts would be reduced to a less than significant level.

The following discussion is based on the traffic analysis for the Project alternatives provided in Section XII of the Transportation Study for The Lincoln Properties Project—100 W. Walnut Street EIR (hereinafter the "Traffic Study"), which is included in Appendix B of this Draft EIR.

(1) Regional Transportation System (Freeways)

Under Alternative 5, the land use development program would be the same as the proposed Project and, thus, freeway-related vehicle trips to and from the Project Site would also be the same. As such, the impacts of Alternative 5 would be the same as the proposed Project with regard to the freeway system. Specifically, Alternative 5 and the proposed Project would result in less than significant impacts at all of the analyzed freeway mainline segments, freeway on-ramps, and freeway off-ramps during both the morning and evening peak hours.

(2) Intersections

Shifting the location of the on-site restaurant uses along Fair Oaks Avenue and replacing the Project's residential amenity area and work/live units with restaurant uses would not result in a redistribution of traffic at the analyzed intersections. Thus, Alternative 5's intersection impacts would be the same as the proposed Project. Like the proposed Project, Alternative 5 would result in significant traffic impacts at four intersections during

the A.M. peak hour and five intersections during the P.M. peak hour. The significant A.M. and P.M. peak hour impacts that occur under the proposed Project occur at the Fair Oaks/Holly Street and Pasadena Avenue/Walnut Street intersections, respectively. Like the proposed Project, with the implementation of the Project's transportation mitigation measures, all intersection impacts would be reduced to less than significant for Alternative 5 with the exception of the Fair Oaks Avenue/Walnut Street intersection. Therefore, as with the proposed Project, Alternative 5 would result in a significant unavoidable impact that cannot be mitigated at the intersection of Fair Oaks Avenue/Walnut Street during the P.M. peak hour on weekdays.

(3) Street Segments

Like the proposed Project, Alternative 5 would increase daily traffic on 11 street segments by 5 to 7.4 percent and on nine street segments by greater than 7.4 percent. Thus, impacts under Alternative 5 would be the same as those identified for the proposed Project. This increase in daily traffic is considered a potentially significant impact. As is the case with the proposed Project, under Alternative 2, funds would be paid into the Neighborhood Traffic Management Capital Improvement Program Fund to implement traffic management measures to protect neighborhoods potentially influenced by the traffic generated by Alternative 2. However, as is case with the proposed Project, DOT has determined that there are no feasible mitigation measures available to reduce segment impacts to below levels of significance (i.e., widening and/or other physical improvements would be in direct conflict with City policies relative to transportation system enhancements that are sustainable and enhance livability within the City). Thus, Alternative 5 impacts on street segments would be significant and similar to the significant impacts of the proposed Project.

(4) Congestion Management Plan

As with the proposed Project, Alternative 5 would not add 150 or more new trips per hour to the CMP mainline freeway monitoring stations or add more than 50 trips to any CMP arterial monitoring location. As Alternative 5 would generate the same number of peak hour trips as the proposed Project, Alternative 5 impacts with regard to CMP freeway and arterial facilities would be the same as the less than significant impacts identified for the proposed Project. Furthermore, Alternative 5 would also generate the same number of transit trips as the proposed Project and, therefore, transit impacts under Alternative 5 would be less than significant, as is the case with the proposed Project.

c. Parking

Like the proposed Project, Alternative 5 would provide a total of 4,244 parking spaces within the North Development Area. As the overall development program and amount of parking under Alternative 5 is the same as the proposed Project, Alternative 5, as is the case with the proposed Project, would provide parking facilities that exceed the combined total of the code required parking for all of the new land uses that would be developed under Alternative 5 as well as replacement parking for every existing parking space that would be displaced by new development. As a result, Alternative 5 would have a less than significant parking impact that would be similar to the Project's less than significant parking impact.

d. Aesthetics, Visual Character, and Views

(1) Construction

Similar to the proposed Project, construction activities associated with Alternative 5 would temporarily alter the visual appearance of the Project Site and surrounding area due to the removal of the surface parking areas. Other construction activities, such as site preparation and grading, the staging of construction equipment and materials, and the construction of new structures also would alter temporarily the visual quality of the Project Site and adjacent roadways. Like the proposed Project, Alternative 5 would be required to comply with mitigation measures, such as the use of temporary construction fencing to screen much of the construction activity from view at the street level and graffiti removal. Compliance with such measures would ensure that impacts to aesthetics/visual quality during construction of Alternative 5 would be less than significant, and equivalent to the less than significant impacts of the proposed Project.

As with the proposed Project, development of Alternative 5 would include the removal of existing on-site trees within Development Areas A, B, and C and the potential removal of existing street trees adjacent to the Project Site along Walnut Street, Pasadena Avenue, and Holly Street. The removal of these street trees would temporarily reduce the visual quality of the streets during the construction phase of the alternative; however, this impact would only occur until the replacement of the street trees occurs and the new on-site landscaping is installed. Thus, like the proposed Project, replacement of these trees would ultimately improve the streetscape in the Project area. Given that removal would be temporary and would not substantially alter or degrade the existing visual character of the area, impacts to the visual character of the Project Site from development of Alternative 5 would be less than significant.

With regard to view obstruction, like the proposed Project, there are four notable views (i.e., San Gabriel Mountains, Old Pasadena, City Hall, and St. Andrew Church bell tower) that could be affected during construction of Alternative 5. Alternative 5 would be developed in accordance with the same development standards as the proposed Project. As the proposed Project would not obstruct an existing valued view, Alternative 5's impacts to views would be less than significant and equivalent to the less than significant impacts of the proposed Project.

(2) Operation

Similar to the proposed Project, the transition of the Project Site from a single use office building with surrounding surface parking into a mixed-use urban campus is not an adverse change to the visual character of the Project Site and surrounding area. Like the proposed Project, Alternative 5 would also implement the City's Citywide Design Principles and Central District Design Guidelines as well as the Project's development standards which would result in a Project design that would enhance and complement the architectural style, landscape, scale, and materials of Old Pasadena. As such, impacts related to visual character from Alternative 5 are less than significant and similar to the less than significant impacts of the proposed Project.

Alternative 5 would be developed in accordance with the same development standards as the proposed Project, except that the proposed restaurant uses would be relocated from Development Area B to the street front along Fair Oaks Avenue in Development Area A. As a result, Alternative 5, as is the case with the proposed Project, would improve views along the Holly Street corridor towards City Hall, would not impact views towards Old Pasadena down the Fair Oaks corridor, and would not impact views of the St. Andrew Church bell tower. With regard to views of the San Gabriel Mountains from the Fair Oaks and Pasadena Avenue corridors, building heights under Alternative 5 would be the same as the proposed Project, and thus, would result in the same limited impacts to the available views of the San Gabriel Mountains that occur under the proposed Project. As such, Alternative 5 would result in less than significant view impacts and impacts that are similar to the less than significant impacts identified for the proposed Project.

e. Light/Glare and Shading

(1) Light/Glare

(a) Construction

As with the proposed Project, construction activities associated with Alternative 5 would involve the use of various lighting sources which have the potential to spillover to off-site sensitive land uses in the vicinity of the Project Site, although the extent of this

impact would be reduced through compliance with PMC Section 9.36.70, which limits the hours of construction. In addition, like the proposed Project, Alternative 5 would implement project design features that include provisions for nighttime lighting to be shielded and/or aimed so that no direct lightbeam spills over outside of the Project Site boundary. Compliance with these measures would ensure that impacts to off-site sensitive uses from lighting sources during construction of Alternative 5 would be considered less than significant and similar to the less than significant impacts identified for the proposed Project.

In addition to impacts from lighting sources, construction activities associated with Alternative 5 also has the potential to result in daytime glare impacts. Like the proposed Project, it is unlikely that such impacts would occur, given the fact that large, flat surfaces, like those needed to generate glare, are typically not associated with construction activities and that any glare produced would be highly transitory and short-term. In addition, Alternative 5 would comply with project design features, like the proposed Project, which would require the shielding of construction related light sources. Furthermore, like the proposed Project, the potential for nighttime glare is considered negligible since construction would mainly occur during daytime hours and lighting during nighttime hours would be designed to comply with the limitations described above. Considering the limited glare sources and that Alternative 5 would comply with the appropriate project design measures, impacts to off-site sensitive uses from daytime and nighttime glare during construction would be considered less than significant and similar to those of the proposed Project.

(b) Operation

Similar to the proposed Project, Alternative 5 would install new lighting sources and would introduce new sources of glare, such as building lighting, security lighting, street lights, and signage lighting, as well as from increased vehicle trips in the Project area. While Alternative 5 would increase light levels at the Project Site compared to existing conditions, the change in the location of the restaurant uses to front along Fair Oaks Avenue in Development Area A would not have a substantive change in overall site lighting conditions. However, it is likely that light levels under Alternative 5 within the southern half of the Fair Oaks Avenue frontage would be somewhat higher than under the proposed Project as lighting related to commercial uses tends to be somewhat higher than lighting associated with residential uses. The opposite of this would be the case along the northern half of the Fair Oaks frontage where relatively lower light levels would occur under Alternative 5 as office uses would replace the restaurant uses that are proposed for this area under the proposed Project. To reduce light and glare impacts, Alternative 5, like the proposed Project, would be required to implement regulatory compliance measures and project design measures which would ensure that appropriate lighting sources and building materials would be installed throughout the Project Site. Adherence to these measures

would ensure that impacts associated with new light and glare sources for Alternative 5 are less than significant and similar to the less than significant impact identified for the proposed Project.

(2) Shading

Under Alternative 5, the development standards, including the heights of development throughout the Project Site would remain the same as the those identified for the proposed Project and, thus, would result in similar impacts. The analysis of the proposed Project identified less than significant impacts to shade-sensitive uses during the winter and summer solstices and the spring and fall equinoxes which would also occur under Alternative 5. Thus, impacts as a result of Alternative 5 would be less than significant and similar to the less than significant impact identified for the proposed Project.

f. Cultural Resources

(1) Historic Resources

As with the Project, no impacts to on-site historic resources would occur under Alternative 5 because there are no historically significant buildings, structures, objects, or sites located within the Project Site.

Off-site historic resources comprised of contributing buildings to the Old Pasadena Historic District are located south of the Project Site on the south side of Union Street and east of the Project Site on the east side of Fair Oaks Avenue. As with the Project, Alternative 5 would not have the potential to alter the immediate surroundings of historic resources south of the Project Site on Union Street because no new buildings would be developed in Development Area E. Development along Fair Oaks Avenue would consist of the same types and mix of land uses as the Project, except with the restaurant uses replacing the residential amenities and work/live units in Development Area A and office uses instead of restaurant uses in the Development Area B. As with the Project, Alternative 5 would be governed by the Central District Specific Plan Design Guidelines which provide measures to ensure, among other things, that new developments within the Central District “respect the surrounding character” through “proper consideration of scale, massing, and detail of individual buildings.” Similar to the Project, Alternative 5 would include setback and building articulation standards that incorporate the corresponding standards set forth in the Central District Specific Plan Design Guidelines. Therefore, like the Project, Alternative 5 would result in new construction that is compatible with the overall character of the Historic District, and the integrity of the District would not be materially impaired by alterations to its setting caused by development within the Project Site.

Overall, impacts to historic resources would be less than significant, similar to those of the Project.

(2) Archaeological and Paleontological Resources

Under Alternative 5, impacts related to archaeological and paleontological resources would be similar to those of the proposed Project given that similar amounts of development and ground disturbance would occur. Like the proposed Project, this alternative would be in a region where archaeological resources are known to occur. As such, although no archaeological and paleontological resources have been recorded on-site, the possibility remains that previously undiscovered subsurface prehistoric or historic-era archaeological and paleontological resources could be encountered during earth-moving construction activities, which is a potentially significant impact. Furthermore, like the proposed Project, it is possible that the Project Site contains undocumented human remains, the disturbance of which would constitute a significant impact. Given these potential impacts, Alternative 5 would be required to implement mitigation similar to Mitigation Measures IV.D.2-1 through IV.D.2-13, which requires procedures to follow should there be a discovery of archaeological resources, paleontological resources, and/or human remains. Implementation and compliance with such mitigation measures would reduce potentially significant impacts to a less than significant level, similar to the proposed Project.

g. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the proposed Project, construction of Alternative 5 would generate pollutant emissions through the use of heavy-duty construction equipment and through haul truck and construction worker trips. The overall amount of site preparation and building construction would be the same under this alternative compared to the proposed Project due to the same types of uses and amount of square footage to be developed under Alternative 5. Pollutant emissions from construction activities would be the same on a daily basis, as the duration and the intensity of these activities would be the same compared to the proposed Project. Thus, overall construction emissions generated by Alternative 5 would be the same as those of the proposed Project over the construction period. Impacts during maximum conditions, those used for measuring significance, would be the same as those of the proposed Project. As such, similar to the proposed Project, regional emissions would be significant and unavoidable even with the incorporation of mitigation measures.

Localized pollutant construction impacts also would be the same as the proposed Project since the intensity of excavation would be the same. Therefore, as with the

proposed Project localized emissions would be less than significant for Alternative 5 and such impacts would be the same as those of the proposed Project.

(b) Toxic Air Contaminants

With respect to construction air toxics, diesel particulate emissions associated with heavy equipment operations during grading and excavation activities represent the greatest potential for TAC emissions. As noted above, the construction emissions generated by Alternative 5 would be the same as those of the proposed Project over the construction period and, thus, would result in the same amount of diesel particulate emissions. In addition, as with the proposed Project, there would be no residual emissions after construction and corresponding individual cancer risk. Therefore, like the proposed Project, construction-related air toxic emission impacts of Alternative 5 would be less than significant and the same as those of the proposed Project.

(c) Odors

As with the proposed Project, Alternative 5 would have the potential to produce odors during construction associated with the operation of construction equipment, the application of asphalt, the application of architectural coatings and other interior and exterior finishes, and roofing. However, like the proposed Project, any odors produced during construction of Alternative 5 would dissipate away from the construction area and would be quickly diluted. Thus, as with the proposed Project, impacts associated with objectionable odors during construction would be less than significant.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Alternative 5 would result in the same amount of development as the proposed Project; however, restaurant uses would replace the work/live units and the residential amenities area within Development Area A and only office uses would be developed in Development Area B. Since there would be no change in the amount of development, regional and localized operational emissions would be the same as the proposed Project. Regional operational emissions under Alternative 5 would be the same as those of the proposed Project, and like the proposed Project would be significant and unavoidable even with the incorporation of mitigation measures and less than significant for localized operational emissions.

Localized operational impacts are also determined by the peak-hour intersection traffic volumes. The localized CO hotspot analysis for the proposed Project did not result in any significant localized CO impacts and impacts were well below the significance

thresholds. Since Alternative 5 would result in the same traffic volumes, similar to the proposed Project, localized impacts would be less than significant under this alternative.

(b) Toxic Air Contaminants

The primary sources of potential air toxics associated with proposed Project operations would include diesel particulate matter from delivery trucks and emergency backup generators, and to a lesser extent, natural gas equipment such as a boiler. As with the proposed Project, Alternative 5 would involve the installation of an additional back-up diesel powered emergency generator. Also, with the same amount of development as the proposed Project, Alternative 5 would result in the same operational diesel particulate matter emissions associated with truck deliveries. Thus, similar to the proposed Project, this alternative would result in a less than significant air quality impact associated with air toxics and such impacts would be similar compared to the proposed Project.

(c) Odors

As with the proposed Project, Alternative 5 would not include any uses identified by the SCAQMD as being associated with odors. Therefore, similar to the proposed Project, potential odor impacts would be less than significant under this Alternative and would be the same as those of the proposed Project due to the same types of land uses and the same building square footage.

h. Climate Change

Similar to the proposed Project, this Alternative would be consistent with the growth projections set forth in the City's General Plan Land Use Element for the Central District. These growth projections are reflected in SCAG's forecasts as the designated MPO and provided for incorporation into CARB's *Climate Change Scoping Plan* (e.g., 2020 BAU employment and population growth rates). As with the proposed Project, Alternative 5 would incorporate numerous project design features to reduce GHG emissions and would be designed to meet the criteria for LEED Silver designation. With consideration of this alternative's design features to reduce cumulative GHG, Alternative 5 would emit the same amount of GHG emissions as the proposed Project due to the same number of daily trips and building square footage relative to the proposed Project. By incorporating energy and vehicle trip reducing features and mitigation measures, such as designing, constructing, and operating the proposed Project to meet LEED Silver certification, Alternative 5 would be the same as the proposed Project and would result in a reduction in GHG emissions from "business-as-usual" consistent with the goals of the State of California and City of Pasadena and is considered less than significant. Such impacts would be the same as those of the proposed Project.

i. Noise and Vibration

(1) Construction

(a) Noise

Like the proposed Project, construction activities associated with the development of Alternative 5 have the potential to generate noise and vibration impacts through the use of construction equipment as well as from construction traffic. Development of Alternative 5 would involve the same stages of construction, including demolition and shoring/excavation stages, which under the proposed Project would result in a less than significant impact at a Project-level but a significant impact on a cumulative basis. Replacing the Project's work/live units and residential amenity area with restaurant uses along Fair Oaks Avenue in Development Area A would not result in construction noise levels that are materially different than what would occur under the proposed Project. As such, Alternative 5 would result in construction noise impacts that are similar to the proposed Project, and as is the case with the proposed Project, Alternative 5 would result in a less than significant impact at a Project-level but a significant impact on a cumulative basis.

In addition to on-site construction noise sources, Alternative 5 would generate off-site construction noise from sources such as materials delivery, concrete mix, haul trucks (trucks), and construction worker vehicles. As Alternative 5's off-site construction truck trips would be the same as those of the proposed Project, impacts under Alternative 5 would be less than significant.

(b) Vibration

Alternative 5 would involve the same construction activities as the proposed Project. As such, vibration impacts under Alternative 5 would be the same as those of the proposed Project. Therefore, Alternative 5 vibration impacts associated with potential building damage and human annoyance during construction activities would be less than significant.

(2) Operation

As with the proposed Project, Alternative 5 would result in on-site stationary noise, off-site mobile noise, and composite noise level impacts. Replacing the Project's work/live units and residential amenity area with restaurant uses along Fair Oaks Avenue in Development Area A would not result in operational noise levels that are materially different than what would occur under the proposed Project. Like the proposed Project, Alternative 5 would be required to implement regulatory compliance measures and project design

features like those proposed for the Project, to ensure that noise impacts from on-site noise sources are reduced to a less than significant level, similar to the proposed Project.

As the types of land uses and building square footage to be developed under Alternative 5 and the proposed Project are the same, the number of vehicle trips generated by Alternative 5 would be the same as the proposed Project. The minor redistribution of vehicle trips that occurs under Alternative 5 would not result in off-site vehicular noise levels that are materially different than those forecasted to occur under the proposed Project. As such, off-site traffic noise impacts associated with Alternative 5 would be less than significant and similar to the proposed Project.

j. Hydrology

Impacts associated with hydrological conditions at the Project Site result from the amount and types of construction activities as well as the types of land uses and the amount of development occurring at the Project Site. As Alternative 5 includes the same types of land uses and the same building square footage as the proposed Project, replacing the Project's work/live units and residential amenity area with restaurant uses along Fair Oaks Avenue in Development Area A would not affect the hydrological conditions that were forecasted to occur at the Project Site during construction and operations of the proposed Project. As the analysis of the Project's hydrological impacts concluded that with the implementation of all regulatory compliance measures, impacts with regard to surface water and groundwater hydrology as well as surface water and groundwater quality would be less than significant, the same less than significant impacts would also occur under Alternative 5.

k. Hazards and Hazardous Materials

Impacts with regard to hazards and hazardous materials result from the amount and types of construction activities as well as the types of land uses and the amount of development occurring at the Project Site. As Alternative 5 includes the same types of land uses, and the same building square footage as the proposed Project, replacing the Project's work/live units and residential amenity area with restaurant uses along Fair Oaks Avenue in Development Area A would not affect conditions with regard to hazards and hazardous materials that were forecasted to occur at the Project Site during construction and operation of the proposed Project. As the analysis of the Project's hazards and hazardous materials impacts concluded that with the implementation of all regulatory compliance and mitigation measures, impacts associated with the transport, use, storage, and management of hazardous materials and hazardous waste management would be less than significant, the same less than significant impacts would also occur under Alternative 5.

l. Public Services

Impacts with regard to the provision of public services (i.e., police protection, fire protection, schools, parks and recreation and libraries) result from the amount and types of construction activities as well as the types of land uses and the amount of development occurring at the Project Site. As Alternative 5 includes the same types of land uses and the same building square footage as the proposed Project, replacing the Project's work/live units and residential amenity area with restaurant uses along Fair Oaks Avenue in Development Area A would not affect conditions with regard to public services that were forecasted to occur at the Project Site during construction and operation of the proposed Project. As the analysis of the Project's impacts with regard to public services concluded that with the implementation of all regulatory compliance and mitigation measures, impacts associated with the provision of police protection, fire protection, schools, parks and recreation and libraries would be less than significant, the same less than significant impacts would also occur under Alternative 5.

m. Utilities

Impacts with regard to the availability of utility services (i.e., water supply and infrastructure, wastewater, and solid waste) to the Project Site result from the amount and types of construction activities as well as the types of land uses and the amount of development occurring at the Project Site. As Alternative 5 includes the same types of land uses and the same building square footage as the proposed Project, replacing the Project's work/live units and residential amenity area with restaurant uses along Fair Oaks Avenue in Development Area A would not affect conditions with regard to the availability of utilities forecasted to occur at the Project Site during construction and operations of the proposed Project. As the analysis of the Project's impacts with regard to utilities concluded that with the implementation of all regulatory compliance measures, impacts associated with the availability of water supply and infrastructure, wastewater, and solid waste would be less than significant, the same less than significant impacts would also occur under Alternative 5.

n. Energy Resources

(1) Construction

The types of construction activities required for Alternative 5 would be similar to the proposed Project given that the types of development would remain unchanged, except for replacing the Project's work/live units and residential amenity area with restaurant uses along the Project Site's Fair Oaks frontage. While petroleum-based fuels would be consumed by construction vehicles and other energy-consuming equipment, consumption

would be similar to the proposed Project. As such, like the proposed Project, Alternative 5 would be required to comply with mitigation measures designed to reduce the consumption of energy resources such as those identified in Section IV.F, Air Quality, which would reduce the Project's reliance on petroleum-based fuels during construction activities. Thus, consumption of petroleum-based fuels would not be expected to have an adverse impact on available supplies. In addition to petroleum-based fuels, electricity would be consumed during conveyance of the water used for construction. Like the proposed Project, construction activities associated with Alternative 5 would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies. Finally, like the proposed Project, Alternative 5 would involve the use of construction materials that contain bound energy. As such, Alternative 5 would be required to implement energy efficiency measures such as Project Design Feature G-1 and Regulatory Compliance Measure E-1 of the Draft EIR, which would also result in the use of sustainable materials and recycled content that would reduce energy consumption during Project construction. Therefore, like the proposed Project, Alternative 5 would not result in the inefficient use of energy resources, create energy utility system capacity problems, create problems with the provision of energy services, or result in a significant impact associated with the construction of new or expanded energy facilities. As such, Alternative 5 impacts would be less than significant and similar to the less than significant impacts identified for the proposed Project.

(2) Operation

During operation of Alternative 5, energy would be consumed for multiple purposes, similar to those identified for the proposed Project. While Alternative 5 would increase energy usage on the Project Site, it would be similar to the increase in energy consumption identified for the proposed Project. Furthermore, like the proposed Project, Alternative 5 would be required to implement a variety of measures designed to reduce energy consumption such as Regulatory Compliance Measure G-1 and Project Design Feature G-2 of this Draft EIR, which require compliance with the various provisions of the 2013 CALGreen Code and prohibits the installation of hearths, respectively. Additionally, PWP's energy demand forecasts are anticipated to account for development of this alternative. Thus, Alternative 5 would be within the demand forecasted within PWP's planning area and would not create energy utility system capacity constraints or require the construction of new or expanded energy facilities beyond what is already anticipated by the City. Furthermore, like the proposed Project, Alternative 5 would result in an increase in VMT and, consequently, an increase in the consumption of petroleum-based fuels; however, this increase would be similar to the proposed Project and, thus, would include measures to facilitate a reduction in VMT and energy consumption. Therefore, like the proposed Project, while operation of Alternative 5 would increase overall energy use on the Project Site, usage would be reduced through the implementation of the aforementioned regulatory compliance measures and project design features. Therefore, Alternative 5 would not result

in the inefficient use of energy resources, create energy utility system capacity problems, create problems with the provision of energy services, or result in a significant impact associated with the construction of new or expanded energy facilities. As such, Alternative 5's impacts would be less than significant and similar to the less than significant impacts identified for the proposed Project.

2. Comparison of Impacts

The analysis presented above indicates that while there are some minor variations in impacts when the location of the restaurant uses are moved further south along Fair Oaks Avenue to Development Area A, this change in the configuration of on-site land uses does not reduce or eliminate any of the Project's significant impacts. As a result, Alternative 5, as is the case with the proposed Project, would result in significant impacts with regard to traffic impacts at the intersection of Fair Oaks Avenue/Walnut Street, regional construction and operational air quality emissions, and cumulative construction noise impacts. In terms of overall conclusions, the impacts of all other issues, as is the case with those referenced above, would be generally the same as the proposed Project.

3. Relationship of the Alternative to Project Objectives

Development proposed under Alternative 5 would be the same as under the Project with the exception of the replacement of the Project's work/live units and residential amenity area with restaurant uses along Fair Oaks Avenue in Development Area A. This change in the configuration of on-site land uses has no affect on the extent to which Alternative 5 meets the objectives of the Project. As such, Alternative 5 would meet all the objectives of the Project.

V. Alternatives

F. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in the EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

A comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project is provided in Table V-2 starting on page V-10. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis presented above addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

As previously stated, implementation of the Project would result in significant and unavoidable impacts with regard to the following: (1) traffic conditions at the Fair Oaks Avenue/Walnut Street intersection; (2) regional construction and operational air emissions; and (3) cumulative construction noise. In addition, implementation of the Project would result in significant and unavoidable cumulative impacts with regard to these same four issues.

Alternative 1, the No Project Alternative, would eliminate all of the significant impacts of the Project. However, Alternative 1 would result in greater, but less than significant, impacts to land use consistency and land use compatibility and on an overall basis would result in no change to the existing site conditions. However, as Alternative 1 eliminates all of the Project's significant impacts, it is determined to be the Environmentally Superior Alternative. In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that while Alternative 2, the Reduced Density Alternative, would reduce the greatest number of Project impacts, all of the Project's three significant and unavoidable impacts would remain under Alternative 2. Notwithstanding, Alternative 2 is selected as the Environmentally Superior Alternative.