

3.0 ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

The purpose of this section is to inform decision makers and the public of the type and magnitude of the change to the existing environment that would result from the proposed project in the City of Pasadena. Environmental topics addressed in this Draft Environmental Impact Report (Draft EIR) have been identified in the Notice of Preparation prepared by the City of Pasadena (the City) for the proposed project. The environmental impact analysis sections of this Draft EIR provide a comprehensive discussion of the existing local and regional environmental conditions, evaluate expected proposed project and cumulative impacts that would result from the proposed project, and determine the level of significance of reasonably foreseeable impacts. The environmental impact analysis sections identify mitigation measures intended to reduce potential environmental impacts to the greatest extent feasible.

This EIR addresses the issues determined to be potentially significant pursuant to the Initial Study, input from neighbors in the community, and responses to the NOP and scoping meetings. This EIR addresses these issues and identifies potentially significant environmental impacts of the project and cumulative development in the City in accordance with provisions set forth in the *California Environmental Quality Act (CEQA) Guidelines*. The EIR also recommends feasible mitigation measures, where possible, that would reduce or eliminate adverse environmental effects. Through this process, the City has determined that the EIR analysis should focus on the following resource areas:

- Air Quality
- Greenhouse Gases
- Land Use
- Noise
- Public Services
- Recreation
- Transportation, Circulation, and Parking

This section of the EIR addresses the potentially significant environmental impacts of the proposed project for the resources listed above. Each environmental resource area is discussed under the following headings: Existing Conditions, Regulatory Framework, Methodology, Thresholds of Significance, Impacts, and Cumulative Impacts.

CUMULATIVE IMPACT ANALYSIS

The technical analysis contained in **Section 3.0, Environmental Impact Analysis**, examines both the proposed project-specific impacts and the potential environmental effects associated with cumulative development. CEQA requires that EIRs discuss cumulative impacts, in addition to the proposed

project-specific impacts. In accordance with CEQA, the discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the proposed project alone. According to Section 15355 of the *State CEQA Guidelines*:

Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

(a) The individual effects may be changes resulting from a single project or a number of separate projects.

(b) The cumulative impact from several projects is the change in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Section 15130(a)(l) of the *State CEQA Guidelines* further states, “a cumulative impact consists of an impact which is created as a result of the combination of the proposed project evaluated in the EIR together with other projects causing related impacts.”

Section 15130(a) of the *State CEQA Guidelines* also requires that EIRs discuss the cumulative impacts of a project when the proposed project's incremental effect is “cumulatively considerable.”¹ Where a lead agency is examining a proposed project with an incremental effect that is not cumulatively considerable, it need not consider the effect significant but must briefly describe the basis for its conclusion. If the combined cumulative impact associated with the proposed project's incremental effect and the effects of other projects is not significant, Section 15130(a)(2) of the *State CEQA Guidelines* requires a brief discussion in the EIR of why a cumulative impact is not significant and why it is not discussed in further detail. Section 15130(a)(3) of the *State CEQA Guidelines* requires supporting analysis in the EIR if a determination is made that a project's contribution to a significant cumulative impact is rendered less than cumulatively considerable and, therefore, is not significant. CEQA recognizes that the analysis of cumulative impacts need not be as detailed as the analysis of project-related impacts, but instead should “be guided by the standards of practicality and reasonableness.” (*State CEQA Guidelines* Section 15130(b)). The discussion of cumulative impacts in this Draft EIR focuses on whether the impacts of the proposed project are cumulatively considerable.

The fact that a cumulative impact is significant does not necessarily mean that the proposed project-related contribution to the cumulative impact analysis is significant as well. Instead, under CEQA, a project-related contribution to a significant cumulative impact is only significant if the contribution is

¹ Under Section 15065(a)(3) of the *State CEQA Guidelines*, “cumulatively considerable” means that “the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”

“cumulatively considerable.” To support each significance conclusion, the Draft EIR provides a cumulative impact analysis; and where project-specific impacts have been identified that, together with the effects of other related projects, could result in cumulatively significant impacts, these potential impacts are documented.

Section 15130(b) of the *State CEQA Guidelines* defines consideration of the following two elements as necessary to provide an adequate discussion of cumulative impacts: “(a) a list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the City, or (b) a summary of projections contained in an adopted general plan or related planning document which is designed to evaluate regional or area wide conditions.” In this Draft EIR, a combination of these two methods is used depending upon the specific environmental issue area being analyzed.