

1.0 INTRODUCTION

This document is a Draft Environmental Impact Report (Draft EIR) that has been prepared at the direction and under the supervision of the City of Pasadena (City) in accordance with the California Environmental Quality Act (CEQA) and the Guidelines for The California Environmental Quality Act (*CEQA Guidelines*), as amended.^{2,3}

In 2009, the City of Pasadena adopted the *Integrated Resource Plan (IRP)*, a blueprint for the Pasadena Department of Water and Power (PWP) to ensure reliable, environmentally responsible electricity service, competitive rates, and energy independence through 2030. The IRP reconfigures PWP's existing electricity portfolio to significantly reduce greenhouse gas emissions through the transition to a mix of renewable energy resources. A key feature of the IRP is the replacement of inefficient local generating units at PWP's Power Plant with new and more efficient equipment. This, together with related infrastructure improvements, constitutes the Glenarm Power Plant Repowering Project (the "project"). The project's background and the legal basis for preparing an EIR are described below.

1.0 PROJECT BACKGROUND

Pursuant to Section 15125 of the *CEQA Guidelines*, this Draft EIR evaluates the project in the context of the conditions that existed at the time the Notice of Preparation (NOP) for this Draft EIR was circulated by the City (September 2011). An Initial Study was prepared for the project and distributed to the State Clearinghouse [State Clearinghouse #2011091056], Office of Planning and Research, responsible agencies, and other interested parties on September 19, 2011, for a 30-day circulation period, ending on October 18, 2011. The Initial Study provides a detailed discussion of the potential environmental topics and the reasons that each topic is or is not analyzed further in the Draft EIR. A public scoping meeting for the Draft EIR was held on October 6, 2011. The NOP, Initial Study, Scoping Meeting materials, and NOP comments are provided in **Appendix A** of this Draft EIR.

Environmental topics for which the project was determined to have no impact or a less than significant impact include: Agricultural Resources, Biological Resources, Cultural Resources (Archaeological and Paleontological Resources), Energy, Geology and Soils, Hydrology and Water Quality, Mineral Resources, Population/Housing, Public Services, Recreation, and Utilities and Service Systems (Wastewater and Solid Waste). Accordingly, these topics are not evaluated in detail in this Draft EIR. The Initial Study determinations for these topics are briefly summarized in **Section 6.0, Other Environmental Considerations**, of this Draft EIR.

2.0 PURPOSE AND LEGAL AUTHORITY

The proposed project requires the discretionary approval of the City of Pasadena City Council. As such, the project is subject to the requirements of CEQA. In accordance with Section 15121 of the *CEQA Guidelines*, the purpose of the EIR is to serve as an informational document that:

² *Public Resources Code Section 21000-21178.*

³ *California Code of Regulations Title 14, Chapter 3, Section 15000-15387.*

“...will inform public agency decisionmakers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.”

This Draft EIR has been prepared as a Project EIR pursuant to Section 15161 of the *CEQA Guidelines*. A Project EIR is appropriate for a specific development project. As stated in this section:

“This type of EIR should focus on the changes in the environment that would result from the development project. The EIR shall examine all aspects of the project including planning, construction, and operation.”

The Draft EIR is intended to serve as an informational document for the public and the City’s decision-makers. In accordance with CEQA, the Draft EIR will be circulated for a 45-day public review and comment period. During the review period, the City of Pasadena will conduct a public meeting to receive public testimony on the Draft EIR. Following the review period, written responses will be prepared on all comments received and these comments and responses will be incorporated into the Final EIR. No final actions (approval or denial of the Project) will be taken until the Final EIR has been reviewed, certified as complete, and considered by the appropriate decision-makers. Dates of meetings when the Project is scheduled to be considered will be published and officially noticed in accordance with all City requirements.

3.0 SCOPE AND CONTENT OF THIS EIR

The content of this EIR was established based on the findings in the Initial Study and public and agency input. In accordance with CEQA, the analysis in the EIR is focused on issues determined in the Initial Study to be potentially significant, whereas issues found in the Initial Study to have less than significant impacts or no impacts do not require further evaluation. Based on the analyses contained in the Initial Study, this EIR analyzes in detail the following environmental issues:

- Aesthetics
- Air Quality
- Cultural Resources (Historical Resources)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Water Supply

The content and format of this Draft EIR are designed to meet the current requirements of CEQA and the *CEQA Guidelines*. The EIR is organized into the sections summarized below:

- **Executive Summary:** Presents a summary of the proposed project and alternatives, potential impacts and mitigation measures, and impact conclusions regarding significant unavoidable adverse impacts and effects not found to be significant.
- **Section 1.0, Introduction:** Describes the purpose and use of the EIR, provides a brief overview of the environmental review process, and outlines the organization of the EIR.
- **Section 2.0, Project Description:** Includes a discussion of the project location, details of the project, and the objectives of the project.

- **Section 3.0, Environmental Setting:** Includes an overview of existing conditions for each of the environmental topics discussed in more detail in **Section 4.0, Environmental Impact Analysis**. This section also includes a list of related projects anticipated to be built in the project area and discusses the methodology for cumulative impacts analysis included in **Section 4.0**.
- **Section 4.0 Environmental Impact Analysis:** Includes an analysis of each of the environmental issues outlined above and a detailed description of the existing conditions or setting for each issue area before project implementation, methods and assumptions used in the impact analysis, thresholds of significance, impacts that would result from the proposed project, and applicable mitigation measures that would eliminate or reduce significant impacts. This section also includes a discussion of cumulative impacts associated with the implementation of the project and related projects in the area.
- **Section 5.0, Alternatives:** Evaluates the likely environmental effects of alternative scenarios to the proposed project, including the No Project Alternative, which is required under CEQA, and other alternatives selected for their ability to avoid or reduce significant project effects while still meeting most project objectives. This analysis briefly discusses alternatives initially considered but rejected from further evaluation, and identifies the environmentally superior alternative from among those alternatives evaluated in detail.
- **Section 6.0, Other Environmental Considerations:** Provides a discussion of issues required by CEQA that are not covered in other chapters. This includes significant and unavoidable adverse impacts, impacts found not to be significant, irreversible environmental changes, potential secondary effects caused by the implementation of the mitigation measures for the Project, and growth inducing impacts.
- **Section 7.0, EIR Preparers and Persons/Organizations Consulted:** Lists the individuals involved in preparation of this EIR and organizations and persons consulted to obtain information to support the EIR analysis.
- **Section 8.0, References:** Identifies the documents and resources consulted in the preparation of this EIR.
- **Appendices:** Presents data supporting the analyses or contents of this Draft EIR. The appendices include the following:
 - Appendix A: NOP/IS; Scoping Meeting Presentation; NOP Comments and Scoping Meeting Sign-In Sheet
 - Appendix B: Air Quality Assessment Worksheets
 - Appendix C: Greenhouse Gas Assessment Technical Report
 - Appendix D: Phase II Investigation and Hazardous Materials Survey Reports
 - Appendix E: Noise Assessment Worksheets and Technical Report
 - Appendix F: Water Supply Documentation

4.0 LEAD, RESPONSIBLE, AND TRUSTEE AGENCIES

The *CEQA Guidelines* define lead, responsible, and trustee agencies. The City of Pasadena is the lead agency for the project because it holds principal responsibility for approving the project. A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. At this time, the responsible agencies for this project include the following: South Coast Air Quality Management District; Los Angeles County Sanitation District; California Department of Toxic Substances Control; State Water Resources Board; California Department of Motor Vehicles; and U.S. Environmental Protection Agency. No trustee agencies have been identified at this time.

5.0 ENVIRONMENTAL REVIEW PROCESS

This Draft EIR was prepared following input from the public, responsible, and affected agencies through the EIR scoping process. In accordance with Section 15063 of the *CEQA Guidelines*, an Initial Study/Notice of Preparation (NOP), were prepared and distributed to responsible agencies, affected agencies, and other interested parties on September 19, 2011. The NOP is a required document that must be submitted to the State Clearinghouse to officially solicit participation in determining the scope of the EIR. In turn, the State Clearinghouse distributed the NOP to involved public agencies. In addition, the NOP was posted at the Office of the Los Angeles County Clerk for 30 days. A public scoping meeting was held on October 6, 2011 to further solicit public input. A copy of the Initial Study and NOP are provided in Appendix A of this EIR.

As stated above, the Initial Study indicated that an EIR is required for the project. This Draft EIR focuses on the environmental impacts identified as potentially significant during the Initial Study and scoping process, which includes aesthetics, air quality, cultural resources (historic resources only), greenhouse gas emissions, hazards and hazardous materials, land use, noise and water supply. All issues not evaluated in detail in Section 5.0 of this EIR are addressed as required in the Initial Study.

This Draft EIR is being circulated for 45 days for public review and comment in accordance with Section 15087 of the *CEQA Guidelines*. Interested parties may provide comments on the Draft EIR in written form. Upon completion of the public comment period, a Final EIR will be prepared that will provide written responses to comments received on the Draft EIR. Written comments received from any State agencies will be made available to those agencies at least ten days prior to the public hearing during which the certification of the Final EIR will be considered. These comments and their responses will be included in the Final EIR for consideration by the City Council.

Prior to approval of the project, the City, as the lead agency and decision-making entity, is required to certify that the EIR has been completed in compliance with CEQA, that the project has been reviewed and the information in this EIR has been considered, and that this EIR reflects the independent judgment of the City. As defined by Public Resource Code (PRC) Section 21081, CEQA also requires the City to adopt “findings” with respect to each significant environmental effect identified in the EIR. For each significant effect, CEQA requires the approving agency to make one or more of the following findings:

- The project has been altered to avoid or substantially lessen significant impacts identified in the Final EIR;

- The responsibility to carry out the above is under the jurisdiction of another agency; or
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

In addition, when approving a project, public agencies must adopt a Mitigation Monitoring and Reporting Program (MMRP), describing the changes that were incorporated into the project or made a condition of project approval in order to mitigate or avoid significant effects on the environment in compliance with PRC Section 21081.6. The MMRP is adopted at the time of project approval and is designed to ensure compliance with the measure during project implementation. Upon approval of the project, the City will be responsible for the implementation of the project's MMRP.

Environmental impacts may not always be mitigated to a less than significant level. When this occurs, impacts are considered significant and unavoidable. If the City concludes that the project would result in significant and unavoidable effects, which are identified in this Draft EIR, the City must adopt a "statement of overriding considerations" prior to approval of the proposed project in compliance with PRC Section 21081. Such statements are intended under CEQA to provide a written means by which the lead agency balances the benefits of the proposed project and the significant and unavoidable environmental impacts. Where the lead agency concludes that the economic, legal, social, technological, or other benefits outweigh the unavoidable environmental impacts, the lead agency may find such impacts "acceptable" and approve the project.

6.0 INTENDED USE OF THIS EIR

This EIR is intended to serve as the environmental document for the proposed actions associated with the Glenarm Power Plant Repowering Project, pursuant to CEQA and the *CEQA Guidelines*. The purpose of this Draft EIR is to assist the City of Pasadena, serving as the Lead Agency, in the decision-making process regarding this Project. In accordance with CEQA, as defined by PRC Code Section 21002.1, the intended uses of this Draft EIR are to identify any significant environmental impacts resulting from implementation of the proposed project, indicate the manner in which these significant effects can be mitigated or avoided, and identify alternatives to the proposed project.

7.0 CUMULATIVE PROJECTS

CEQA requires that EIRs analyze cumulative impacts. Section 15355 of the *CEQA Guidelines* defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." In addition, Section 15130 of the *CEQA Guidelines* indicates that the analysis of cumulative impacts need not be as in-depth as analysis prepared for the proposed project, but instead is to "be guided by the standards of practicality and reasonableness."

Cumulative impacts are anticipated impacts of the project considered together with reasonably foreseeable growth in the project area. According to Section 15130(b)(1) of the *CEQA Guidelines*, either one of the following elements is necessary to provide an adequate discussion of significant cumulative impacts:

- A list of past, present, and probable future projects producing related or cumulative impacts; or

- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental planning document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

Known planned and pending projects in the City of Pasadena are identified in **Section 3.0, General Description of Environmental Setting**, of this Draft EIR. These projects, as appropriate and pertinent, are considered in the cumulative analyses in **Section 4.0, Environmental Impact Analysis**, of this Draft EIR.