

Attachment 1

**CITY OF PASADENA
PLANNING DIVISION
HALE BUILDING
175 NORTH GARFIELD AVENUE
PASADENA, CA 91101-1704**

DRAFT INITIAL STUDY

In accordance with the Environmental Policy Guidelines of the City of Pasadena, this analysis, the associated "Master Application Form," and/or Environmental Assessment Form (EAF) and supporting data constitute the Initial Study for the subject project. This Initial Study provides the assessment for a determination whether the project may have a significant effect on the environment.

SECTION I – PROJECT INFORMATION

1. Project Title: 1000 Rose Avenue
PLN2002-02006

2. Lead Agency Name and Address: City of Pasadena
Planning and Development Department
Community Planning Section
175 North Garfield Avenue
Pasadena, California 91101-1704

3. Contact Person and Phone Number: Patrice A. Martin
(626) 744 - 3758

4. Project Location: 1000 Rose Avenue

5. Project Sponsor's Name and Address: Burke Farrar
Odyssey Development Services
51 West Dayton Street
Pasadena, California 91103

6. General Plan Designation: Medium Density Residential (0 – 16
Dwelling units per acre)

7. Zoning: RS-1 (Single Family Residential
District, one unit per acre)

8. Description of the Project: The project is located in the City of Pasadena, County of Los Angeles. The project is a 4.75 acre parcel located between Altadena Drive and Washington Boulevard, north of Sierra Madre Villa. Thirty-Five (35) single family residences are being proposed. A Zone Change is being requested from the existing RS-1 Zoning District to a Planned Development. A subdivision is being requested to create the lots for individual ownership. The site was formerly leased from the

Pasadena Unified School District to a private tennis club. The existing tennis court facilities will be demolished in order to build the new single family homes.

Note - A location map and a site plan are included in Appendix A.

9. Surrounding Land Uses and Setting: Surrounding land uses include single family residences to the north, west, and east, and a school to the south (Pasadena High School).
10. Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement): The Planning Commission will review the project proposal and make a recommendation to the City Council on the Planned Development, Zone Change, and Subdivision applications. The City of Pasadena Department of Public Works, Department of Transportation, Building Division, Water and Power Department, Fire Department, and Planning and Development Department will review the project. The layout of the Planned Development is subject to review and approval by the Design Commission.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Significant Unless Mitigation Incorporated" as indicated by the checklist on the following pages.

	Aesthetics		Geology and Soils		Population and Housing
	Agricultural Resources		Hazards and Hazardous Materials		Public Services
X	Air Quality		Hydrology and Water Quality		Recreation
	Biological Resources		Land Use and Planning	X	Transportation/Traffic
	Cultural Resources		Mineral Resources		Utilities and Service Systems
	Energy		Noise	X	Mandatory Findings of Significance

DETERMINATION: (to be completed by the Lead Agency)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that, although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.	X
I find that the proposed MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	

Patrice A. Martin
Prepared By/Date

Patrice A. Martin
Printed Name

Jennifer Paige-Saeki
Reviewed By/Date

Jennifer Paige-Saeki
Printed Name

Negative Declaration/Mitigated Negative Declaration adopted on: _____

Adoption attested to by: _____
Printed name/Signature Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 20, "Earlier Analysis," may be cross-referenced).
- 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. See CEQA Guidelines Section 15063(c)(3)(D). Earlier analyses are discussed in Section 20 at the end of the checklist.
 - a) Earlier Analysis Used. Identify and state where they are available for review.

- b) **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) **Mitigation Measures.** For effects that are "less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier documents and the extent to which address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
 - 7) **Supporting Information Sources:** A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
 - 8) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significant
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SECTION II - ENVIRONMENTAL CHECKLIST FORM

1. BACKGROUND.

Date checklist submitted: October 10, 2005
 Department requiring checklist: Planning and Development Department
 Case Manager: Patrice A. Martin (626) 744 - 3758

2. ENVIRONMENTAL IMPACTS. (explanations of all answers are required):

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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3. AESTHETICS. Would the project:

a. *Have a substantial adverse effect on a scenic vista?* ()

WHY? The project site is in an area that offers views of the San Gabriel Mountains. Although this area contains a mix of single family residences ranging from one to two stories in height which already minimally obstruct this scenic view, the main view corridor is well preserved. The project meets the height limitations as specified in the Zoning Code. Therefore, the addition of the proposed project of 35 single family, two-story homes would not substantially impact any scenic vista as defined in the 1994 Final Environmental Impact Report for the Land Use and Mobility Elements of the City of Pasadena General Plan. In accordance with section 17.61.030 of the City's Zoning Code, the design of this project, including its obstruction of any scenic vista or view, will be reviewed by the Design Commission. Although the project would not significantly impact a scenic vista, this regulatory procedure provides the City with an additional layer of review for aesthetics, and an opportunity to incorporate additional conditions to increase the aesthetic value of the project.

b. *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?* ()

WHY? The only designated state scenic highway in the City of Pasadena is the Angeles Crest Highway (State Highway 2), which is located north of Arroyo Seco Canyon in the extreme northwest portion of the City. The project site is not within the viewshed of the Angeles Crest Highway, and not along any scenic roadway corridors identified in the City's General Plan documents. The project includes the removal of 36 trees. Although most of the trees are listed on the Protected Tree Specimen List, they do not meet the diameter requirement of the Tree Protection Ordinance. However, the developer is proposing to plant one 24" box tree that meets the specimen and size requirement for protection under the Tree Protection Ordinance, for each lot in the subdivision. Further, the developer will comply with the requirements of the Master Street Tree Plan, which calls for Oak trees to be planted 20 feet on center in the parkway. Therefore, the replacement total for this project will exceed the 40 trees to be removed and the impacts of the proposed tree removal will be reduced to a less than significant level.

The project does not affect an Official State Highway or Los Angeles County Recommended Scenic Highway. The project is located north of the Foothill Freeway (I-210). The proposed project would not damage any scenic resources, and would not otherwise affect the visual quality of the roadway corridor. The project would not negatively affect any historic structures, landscape features, or vegetation that contribute to the views along the corridor. The proposed project would not result in the destruction of

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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any rock outcropping or natural feature recognized as having significant aesthetic value. Therefore, the proposed project would not significantly impact any locally-recognized scenic roadway corridors.

The proposed site has not been designated as an historic resource. The site does not have structures that have been designated as historic resources. The proposed project would not impact nearby sites or structures, which are historic resources. The project is not part of a landmark district.

In an effort to reduce aesthetic impacts, Section 17.44.040 requires submittal of a Landscape and Irrigation Plan. The applicant must submit landscape plans for review and approval by the Zoning Administrator (the Water Division of the Water and Power Department, the Design and/or Historic Preservation Commission.) Grading plans are required to be reviewed and approved by the Building Official, Public Works Department and the Zoning Administrator (or staff) prior to the issuance of any building permit.

c. *Substantially degrade the existing visual character or quality of the site and its surroundings? ()*

WHY? The proposed project consists of developing 35 single family residences on a 4.75 acre site formerly used as a private tennis club in a fully developed urban area of the City. The proposed project is within the height limitations of the Zoning Code. As proposed, some of the homes exceed the mass limitations of the Zoning Code, specifically, the 35% maximum lot coverage permitted in the single-family zones. However, the project is overall less dense at 7.3 dwelling units per acre than the 12.9 units per acre that the General Plan allows. The project is required to submit a landscape plan for review and approval by the Zoning Administrator and/or Design Review Commission or staff) prior to the issuance of any building permits. Approval of the proposed project would not lead to any demonstrable negative aesthetic impact.

The Planned Development layout will go through Design Review to ensure consistency with the existing neighborhood character. The project will be required to comply with the specifications of the Tree Protection Ordinance and the Master Street Tree Plan. These regulatory procedures, along with the Grading Ordinance and landscape regulations will continue to ensure that the project meets the City's standards for engineering, site design, and suitability.

As required by section 17.61.030 of the Pasadena Municipal Code, the design of this project will be reviewed for approval by the Design Commission. This regulatory procedure was established to ensure that the design, colors, and finish materials of development projects comply with adopted design guidelines and achieve compatibility with the surrounding area. Although the project would not substantially degrade the visual character of the site and surroundings, this regulatory procedure provides the City with an additional layer of review for aesthetics, and an opportunity to incorporate additional conditions to increase the aesthetic value of the project. Therefore, there will be no significant impacts.

d. *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ()*

WHY? The project will not have a significant impact on light and glare because it will be required to comply with the standards in the zoning code that regulate glare and outdoor lighting. Height and

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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direction of any outdoor lighting and the screening of mechanical equipment must conform to Zoning Code requirements. The project is in an established, residential area with streetlights in place. These lights are not substantial sources of glare and are an aide to public safety.

The design of this project will be reviewed for approval through the Design Review process. This regulatory procedure provides the City with an additional layer of review for aesthetics including light and glare, and an opportunity to incorporate additional conditions to improve the project's building materials and lighting plans.

The proposed project homes will be two stories and 30 feet in height. This height is within the 32 feet height limit permitted in the single-family zoning districts. The surrounding uses range from 1 to 2 stories in height. Compliance with the single-family district setbacks aid in reducing possible shade and shadow impacts to a level that is insignificant.

4. AGRICULTURAL RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project.

a. *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? ()*

WHY? The City of Pasadena is a developed urban area surrounded by hillsides to the north and northwest. The western portion of the City contains the Arroyo Seco, which runs from north to south through the City. It has commercial recreation, park, natural and open space. The City contains no prime farmland, unique farmland, or farmland of statewide importance, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

b. *Conflict with existing zoning for agricultural use, or a Williamson Act contract? ()*

WHY? The City of Pasadena has no Williamson Act contract land and has no land zoned for agricultural use other than commercial nurseries being allowed by right in the CG (General Commercial) and IG (General Industrial) zones and conditionally in the CO (Office Commercial), CL (Limited Commercial), OS (Open Space) and PS (Public-Semi Public) Zoning Districts. The proposed project would not preclude the use of commercial nurseries in any allowed zones.

c. *Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use? ()*

WHY? There is no known farmland in the City of Pasadena; therefore the proposed project would not result in the conversion of farmland to a non-agricultural use.

Potentially Significant Impact

Significant Unless Mitigation is Incorporated

Less Than Significant Impact

No Impact

5. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan? (NO)

WHY? The City of Pasadena is within the South Coast Air Basin (SCAB), which is bounded by the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the Pacific Ocean to the south and west. The air quality in the SCAB is managed by the South Coast Air Quality Management District (SCAQMD).

The SCAB has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are exceeded. Because of the violations of the California Ambient Air Quality Standards (CAAQS), the California Clean Air Act requires triennial preparation of an Air Quality Management Plan (AQMP). The AQMP analyzes air quality on a regional level and identifies region-wide attenuation methods to achieve the air quality standards. These region-wide attenuation methods include regulations for stationary-source polluters; facilitation of new transportation technologies, such as low-emission vehicles; and capital improvements, such as park-and-ride facilities and public transit improvements.

The most recently adopted plan is the 2003 AQMP, adopted on August 1, 2003. This plan is the South Coast Air Basin's portion of the State Implementation Plan (SIP). This plan is designed to achieve the 5 percent annual reduction goal of the California Clean Air Act.

The SCAQMD understands that Southern California is growing. As such, the AQMP accommodates population growth and transportation projections based on the predictions made by the Southern California Association of Governments (SCAG). Thus, projects that are consistent with employment and population forecasts are consistent with the AQMD.

In addition to the region-wide AQMP, the City of Pasadena participates in a sub-regional air quality plan-the West San Gabriel Valley Air Quality Plan. This plan, prepared in 1992, is intended to be a guide for the 16 participating cities, and identifies methods of improving air quality while accommodating expected growth.

The proposed project is not consistent with the current Zoning designation for the site, however it is consistent with the General Plan Land Use designation for the site. Because the site is consistent with the density and projected growth envisioned under the General Plan it is within the growth accommodated by the AQMP and SCAQMD. Further, the proposed use of 35 single-family residences, does not generate substantial vehicle trips or cause an exceedance of criteria pollutants in the study area since the project stays below the thresholds for both construction, and operations established by the SCAQMD. The proposed project is therefore consistent with the AQMP and the West San Gabriel Valley Air Quality Plan, and would cause no significant related impacts.

b. Violate any air quality standard or contribute to an existing or projected air quality violation? (NO)

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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WHY? Due to its geographical location and the prevailing off shore daytime winds, Pasadena receives smog from downtown Los Angeles and other areas in the Los Angeles basin. The prevailing winds, from the southwest, carry smog from wide areas of Los Angeles and adjacent cities, to the San Fernando Valley and to Pasadena in the San Gabriel Valley where it is trapped against the foothills. For these reasons the potential for adverse air quality in Pasadena is high.

Pasadena is located in a non-attainment area, an area that frequently exceeds national ambient air quality standards. The SCAQMD has developed significance thresholds that correspond to the air quality standards for the SCAB. These thresholds are described in Chapter 6 of the SCAQMD CEQA Handbook (1993) and shown in the Tables below.

The proposed project would generate short-term air pollutants from construction activities and long-term air pollutants from vehicle trips and household practices (i.e., natural gas combustion). An Air Quality Study was prepared and the proposed project's potential air emissions were calculated using the "URBEMIS 2002 Air Emissions From Land Development" model (URBEMIS model) using the following assumptions:

- The project consists of developing 35 single-family residential dwelling units;
- The proposed project would generate traffic according to the following generation rates 9.57;
- Based on discussions with the project team, it is assumed for purposes of this analysis that grading of the approximate 4.75 acre site will take place over a period of 60 days. Construction activity is estimated to begin in February of 2006 and to be completed by February of 2007;
- Grading of the approximate 4.75-acre site will involve the following equipment: Rubber Tired Dozers, Tractor/Loader/Backhoes;
- Construction of the proposed structure will take 12 months, which includes 1 month to apply architectural coatings. Construction is expected to involve the following equipment Concrete/Industrial saws, Rough Terrain Forklifts, Graders, Pavers, and Rollers. (See report 1000 Rose Avenue Residential Project, Air Quality Impact Analysis, Urban Crossroads, Inc., August 8, 2005 for more detailed information).

The tables below represent the estimated air quality emission of the proposed project as calculated by the URBEMIS model:

**SUMMARY OF PEAK OPERATIONAL EMISSIONS (SUMMER)
(POUNDS PER DAY)**

Operational Activities	VOC	NO _x	CO	SO _x	PM ₁₀
Vehicle Emissions	2.87	3	33.02	0.02	2.93
Natural Gas Use	0.06	0.73	0.31	0	0
Landscape Maintenance Emissions	0.17	0.01	1.22	0.01	0
Consumer Products	1.71	0	0	0	0
Total Operational Emissions	4.81	3.74	34.55	0.03	2.93
Operations Significance Threshold	55	55	550	150	150
Significant?	NO	NO	NO	NO	NO

Source: URBEMIS 2002 v 8.7.0
Report: 1000 Rose Avenue Residential Project Air Quality Analysis, Urban CR

Potentially Significant Impact
Significant Unless Mitigation is Incorporated
Less Than Significant Impact
No Impact

**SUMMARY OF PEAK OPERATIONAL EMISSIONS (WINTER)
(POUNDS PER DAY)**

Operational Activities	VOC	NO _x	CO	SO _x	PM ₁₀
Vehicle Emissions	2.61	4.35	31.23	0.02	2.93
Natural Gas Use	0.06	0.73	0.31	0	0
Fireplace	0.02	0.29	0.12	0	0.02
Consumer Products	1.71	0	0	0	0
Total Operational Emissions	4.40	5.37	31.66	0.02	2.95
Operations Significance Threshold	55	55	550	150	150
Significant?	NO	NO	NO	NO	NO

Source: URBEMIS 2002 v 8.7.0
Report: 1000 Rose Avenue Residential Project Air Quality Analysis, Urban CR

**EMISSIONS SUMMARY OF PEAK CONSTRUCTION ACTIVITIES
(POUNDS PER DAY)**

Construction Activities	VOC	NO _x	CO	SO _x	PM ₁₀
Grading Activity	9.02	76.23	64.38	0.1	41.57
Building Construction	8.41	63.43	62.56	0	2.94
Architectural Coatings	572.15	0	0	0	0
Peak Day Construction Emissions	580.57	76.23	64.38	0.10	41.57
Construction Significance Threshold	75	100	550	150	150
Significant?	YES	NO	NO	NO	NO

Source: URBEMIS 2002 v 8.7.0
Report: 1000 Rose Avenue Residential Project Air Quality Analysis, Urban Crossroads, Inc.

**EMISSIONS SUMMARY OF PEAK CONSTRUCTION ACTIVITIES
(POUNDS PER DAY) (MITIGATED)**

Construction Activities	VOC	NO _x	CO	SO _x	PM ₁₀
Grading Activity	9.02	76.23	64.38	0.1	41.57
Building Construction	8.41	63.43	62.56	0	2.94
Architectural Coatings	57.22	0	0	0	0
Peak Day Construction Emissions	65.64	76.23	64.38	0.10	41.57
Construction Significance Threshold	75	100	550	150	150
Significant?	NO	NO	NO	NO	NO

Source: URBEMIS 2002 v 8.7.0
Report: 1000 Rose Avenue Residential Project Air Quality Analysis, Urban Crossroads, Inc.

As shown in the tables above, the proposed project would not exceed the Thresholds of Significance established by the SCAQMD (after emissions reduction measures for construction). Therefore, the proposed project would not cause a violation of an air quality standard, and would have no significant related impacts.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The URBEMIS model assumes the use of paint with 250 grams/liter (g/l) of Volatile Organic Compounds (VOCs) including ROG. The newly incorporated SCAQMD Rule 1113, which applies to the project, limits the VOC level in paint to 100 g/l. Based on the use of Zero-VOC paint (no more than 100 grams/liter VOC). Assuming 4-mil thick Zero-VOC paint would contain .8345 lbs/gal VOC; so in order to stay below 75lbs/day threshold

$$(75 \text{ lbs/day}) / (.8345 \text{ lbs/gal VOC}) = \text{approx. } 88 \text{ gal/day}$$

$$88 \text{ gal/day} \times 6 \text{ days/week} = 528 \text{ gal/wk.}$$

Typical home requires 25 gallons of paint, therefore $(528 \text{ gal/wk.}) / (25 \text{ gal/home}) = \text{approx. } 18$ homes/week can be painted to stay below threshold. Mitigation Measure AQ 1 limits paint application to 88 gallons per day. With this mitigation measure neither operation nor construction of the proposed project would generate air pollutants in excess of the SCAQMD thresholds. Therefore with the incorporation of this mitigation measure there will be a less than significant impact in relation to air quality standards.

MITIGATION MEASURE AIR QUALITY 1: Paint application for the proposed homes is limited to 88 gallons per day. For monitoring purposes, this equals approximately 18 homes per week.

- c. *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*
()

The City of Pasadena is within the South Coast Air Basin (SCAB). This basin is a non-attainment area for Ozone (O₃), Fine Particulate Matter (PM_{2.5}), Respirable Particulate Matter (PM₁₀), and Carbon Monoxide (CO), and is in a maintenance area for Nitrogen Dioxide (NO₂). Projects that contribute to a significant cumulative increase in O₃, PM_{2.5}, PM₁₀, CO, or NO₂ will be considered to be significant and require the consideration of mitigation measures.

As shown in the tables above, the proposed project before mitigation would exceed the SCAQMD's Thresholds for Significance. However, with incorporation of MM AQ 1 as outlined in response 5b, the project's emissions would not exceed thresholds of significance. The SCAQMD established these thresholds in consideration of cumulative air pollution in the SCAB. Thus, projects that do not exceed the SCAQMD's thresholds do not significantly contribute to cumulative air quality impacts. Since after mitigation the proposed project would not exceed the SCAQMD's thresholds, the project would not result in a cumulatively considerable net increase of any criteria pollutant, and the project would have no related significant impacts.

- d. *Expose sensitive receptors to substantial pollutant concentrations?* ()

The potential sensitive receptors include Pasadena High School which is located adjacent to the project

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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site and the single family residences in the surrounding area. Construction of the project will not generate any primary pollutants (CO, PM 10, PM 2.5) in excess of the SCAQMD Thresholds of Significance. Since emissions of primary pollutants generated with the construction phase of the project are estimated to be at less than significant levels, there will be no significant impacts to sensitive receptors in the project area. The project's construction would generate dust which could settle beyond the project site in the vicinity area. Although this type of dust is not associated with human health problems it may cause some nuisance impacts such as soiling on cars, lawn furniture etc. These impacts will be less than significant.

The introduction of single-family homes to the area will not result in significant operational impacts or a noticeable change in the air quality in the project vicinity. However, project induced vehicle trips would be added to the roadway network and could contribute to carbon monoxide levels at congested intersections. Although the 8-hour allowable CO concentration of 9.0 p.p.m. is exceeded for with Project Conditions, it should be noted that the study area intersections already experience this exceedance prior to the addition of project-related traffic for both Existing Conditions and Without Project Conditions. Based on the SCAQMD Handbook, in order to determine significance for intersections that are already in exceedance of background concentrations for the 8-hour CO standard, it is recommended that the analysis determine if there will be a measurable increase at the project site. A measurable increase is defined as an increase of .45 ppm for the 8-hour CO standard, this methodology is consistent with the District Rule XIII's definition of a significant impact (SCAQMD 1993). As seen in comparing the results from the air quality analysis (See report 1000 Rose Avenue Residential Project, Urban Crossroads, Inc. August 8, 2005.) there is no measurable increase in CO concentrations as a result of the project, in fact there is a slight decrease of .28 ppm from Future With Project Conditions to Existing Conditions. Consequently, sensitive receptors would not be significantly affected by CO emissions generated by Project-related traffic since the project does not contribute a "measurable increase" to the current exceedance as defined by the SCAQMD.

e. *Create objectionable odors affecting a substantial number of people?* ()

This type of use is not shown on the 1993 SCAQMD's CEQA Air Quality Handbook Figure 5-5 "Land Uses Associated with Odor Complaints." Therefore, the proposed project would not create objectionable odors, and would have no associated impacts.

6. BIOLOGICAL RESOURCES. Would the project:

a. *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

()

WHY? The project is in a developed urban area. There are no known unique, rare or endangered plant or animal species or habitats on or near the site. Mostly paved, the site has no landscaping or habitat subject to review by the Department of Fish and game or U.S. Fish and Wildlife Service. Construction of

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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single family residences will not affect any special status identified in local or regional plans, regulations, or policies.

- b. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?* ()

WHY? There are no designated natural communities in the City. Since the Final EIR for the 2004 General Plan Land Use and Mobility Elements does not provide baseline biological resource information for the City, the Final EIR for the 1994 Land Use and Mobility Elements contains the best available City-wide documented biological resources. This EIR identifies the natural habitat areas within the City's boundaries to be the upper and lower portions of the Arroyo Seco, the City's western hillside area, and Eaton Canyon. The project is located in a fully developed urban area, and not near any of these natural habitat areas.

- c. *Have a substantial adverse effect of federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?* ()

WHY? The project is located in a developed urban area. There is no known naturally occurring wetland habitat.

- d. *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?* ()

WHY? The project is located in a developed urban area and does not involve the dispersal of wildlife nor will the project result in a barrier to migration or movement. Therefore, the project will have no impact to wildlife movement.

- e. *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?* ()

WHY? The only local ordinance protecting biological resources in the City of Pasadena is Ordinance No. 6896 "City Trees and Tree Protection Ordinance". Although the site contains approximately 36 trees, they are not protected because they do not meet the minimum diameter requirement. The Table below simply lists the trees for reference information only.

Potentially Significant Impact **Significant Unless Mitigation is Incorporated** **Less Than Significant Impact** **No Impact**

#	Genus & Species	Common Name	Diameter	Remain	Move	Replace	Remove
1	Pinus canariensis	Canary Island Pine	14			x	x
2	Cupaniopsis anacardiodes	Carrot Wood	6				x
3	Cupaniopsis anacardiodes	Carrot Wood	6			x	x
4	Cupaniopsis anacardiodes	Carrot Wood	6			x	X
5	Dead Tree unidentified on Tree Inventory						x
6	Cupaniopsis anacardiodes	Carrot Wood	4			x	x
7	Liquidambar styraciflua	Sweet Gum	6			x	x
8	Liquidambar styraciflua	Sweet Gum	5			x	x
9	Liquidambar styraciflua	Sweet Gum	4			x	x
10	Dead Tree unidentified on Tree Inventory					x	x
11	Cupaniopsis anacardiodes	Carrot Wood	4			x	x
12	Dead Tree unidentified on Tree Inventory					x	x
13	Cupaniopsis anacardiodes	Carrot Wood	3			x	x
14	Cupaniopsis anacardiodes	Carrot Wood	5			x	x
15	Ficus micocarpua nitida	Indian Laurel Fig	6			x	x
16	Pinus canariensis	Canary Island Pine	18			x	x
17	Washingtonia filifera	Mexican Fan Palm	22			x	x
18	Jacaranda mimosifolia (Already removed)	Jacaranda (Diameter unidentified)				x	x
19	Dead Tree unidentified on Tree Inventory					x	x
20	Jacaranda mimosifolia	Jacaranda	4			x	x
21	Jacaranda mimosifolia	Jacaranda	4			x	x
22	Jacaranda mimosifolia	Jacaranda	4			x	x
23	Liquidambar styraciflua	Sweet Gum	4			x	x
24	Cupaniopsis anacardiodes	Carrot Wood	4			x	x

		Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact	
25	Cupaniopsis anacardiodes	Carrot Wood	4		x	x
26	Jacaranda mimosifolia	Jacaranda	4		x	x
27	Jacaranda Mimosifolia (Already removed)	Jacaranda	4		x	x
28	Cupaniopsis anacardiodes	Carrot Wood	5		x	x
29	Jacaranda Mimosifolia (Already removed)	Jacaranda	4		x	x
30	Jacaranda Mimosifolia	Jacaranda	4		x	x
31	Liquidambar styraciflua	Sweet Gum	6		x	x
32	Liquidambar styraciflua	Sweet Gum	6			
33	Liquidambar styraciflua	Sweet Gum	6		x	x
34	Pinus canariensis	Canary Island Pine	24		x	x
35	Washingtonia filifera	Mexican Fan Palm 2	20		x	x
36	Ficus micocarpua (nitida already removed)	Indian Laurel Fig	18			
37	Ficus micocarpua (nitida already removed)	Indian Laurel Fig	24		x	x
38	Ficus micocarpua (nitida already removed)	Indian Laurel Fig	28		x	x
39	Ficus micocarpua (nitida already removed)	Indian Laurel Fig	4		x	x
40	Cupaniopsis anacardiodes	Carrot Wood	4		x	x

Although a number of protected tree specimens will be removed as part of the project, again they do not meet the minimum diameter requirements as set forth in the Tree Protection Ordinance. Further, the applicant is proposing to provide a minimum of one replacement tree per lot, in addition to generous landscaping, including trees, proposed throughout the subdivision. Further, additional trees will be planted in accordance with the Master Street Tree Plan. Further, according to Pasadena Municipal Code Chapter 8.52.075(6), "the project as defined in Section 17.12.020. includes a landscape design plan which will result in a tree canopy coverage of greater significance than the tree canopy coverage being removed, within a reasonable time after completion of the project".

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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f. *Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan? ()*

WHY? Currently, there are no adopted Habitat Conservation or Natural Community Conservation Plans within the City of Pasadena. There are also no approved local, regional or state habitat conservation plans in Pasadena.

7. CULTURAL RESOURCES. Would the project:

a. *Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5? ()*

WHY? There are no known buildings, structures, natural features, works of art or similar objects on the site having a significant historic value to the City which are to be demolished, relocated, removed, or significantly altered by the project. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource, and the project would have no related impacts.

b. *Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? ()*

WHY? There are no known prehistoric or historic archeological sites on the project site. In addition, the project site does not contain undisturbed surficial soils. The site was formerly developed as a private tennis club. If archaeological resources once existed on-site, it is likely that previous grading, construction, and modern use of the site have either removed or destroyed them. Consequently, surficial soils on the project site are devoid of archaeological resources.

Development of the proposed project would involve minor grading to establish building pads and develop onsite infrastructure. However, the proposed grading would not encroach into undisturbed soils. Therefore, the proposed project would have no impacts to archaeological resources.

There are no buildings, structures, natural features, works of art or similar objects scheduled for demolition, relocation, removal or significant alteration on the project site, which are of significant archaeological value to the City.

c. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ()*

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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WHY? The project site lies on the valley floor in an urbanized portion of the City of Pasadena. This portion of the City does not contain any unique geologic features and is not known or expected to contain paleontological resources. Therefore, the proposed project would not destroy a unique paleontological resource or unique geologic feature, and would have no related impacts.

d. *Disturb any human remains, including those interred outside of formal ceremonies?* ()

WHY? There are no known human remains on the site. The project site is not part of a formal cemetery and is not known to have been used for disposal of historic or prehistoric human remains. Thus, human remains are not expected to be encountered during construction of the proposed project. In the unlikely event that human remains are encountered during project construction, State Health and Safety Code Section 7050.5 requires the project to halt until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resources Code Section 5097.98. Compliance with these regulations would ensure the proposed project would not result in significant impacts due to disturbing human remains.

8. ENERGY. Would the proposal:

a. *Conflict with adopted energy conservation plans?* ()

WHY? The project does not conflict with the 1983 adopted Energy Element of the General Plan. Although the proposed intensity of the project exceeds the intensity allowed by the Zoning Code, the intensity was envisioned in the City's approved General Plan. Further the project will comply with the energy standards in the California Energy Code, Part 6 of the California Building Standards Code (Title 24), which will be a condition of approval. Measures to meet these performance standards may include high-efficiency Heating Ventilation and Air Conditioning (HVAC) and hot water storage tank equipment, lighting conservation features, higher than required rated insulation and double-glazed windows.

b. *Use non-renewable resources in a wasteful and inefficient manner?* ()

Why? The long-term impact from increased energy use by this project is not significant in relationship to the number of customers currently served by the electrical and gas utility companies. Supplies are available from existing mains, lines and substations in the area. Occupation of the project will result in an insignificant increase in the consumption of natural gas. This consumption will be lessened by adherence to the performance standards of California Energy Code, Part 6 of the California Building Standards Code Title 24. This project will result in the increased consumption of 724 net kilowatt-hours of electrical energy per day. This increased consumption will be reduced to an insignificant level by meeting the above referenced energy standards. Measures to meet these performance standards may include high efficiency Heating Ventilation and Air Conditioning (HVAC) and hot water storage tank equipment, lighting conservation features, higher than required rated insulation and double-glazed windows. The energy conservation measures will be prepared by the developer and shown on a building plan(s). This plan will be submitted to the Water and Power Department and Building Official for review and approval prior to the issuance of a building permit.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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Installation of energy-saving features will be inspected by a Building Inspector prior to issuance of a Certificate of Occupancy.

This project will result in an increase of approximately 9100 gallons per day in water consumption. The current use consumes 0 gallons of water per day (the private tennis court site is abandoned). Although there is a net gain in water consumption, this impact will be mitigated during drought periods by the applicant adhering the Water Shortage Procedures Ordinance, which restricts water consumption to 90% of expected consumption during each billing period. Installation of plumbing will be inspected by a Building Inspector prior to issuance of a Certificate of Occupancy.

9. GEOLOGY AND SOILS. Would the project:

- a. *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*
 - i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ()*

WHY? According to the 2002 adopted Safety Element of the City of Pasadena’s General Plan, the San Andreas Fault is a “master” active fault and controls seismic hazard in Southern California. This fault is located approximately 21 miles north of Pasadena.

The County of Los Angeles and the City of Pasadena are both affected by Alquist-Priolo Earthquake Fault Zones. Pasadena is in four USGS Quadrants, the Los Angeles, and the Mt. Wilson quadrants were mapped for earthquake fault zones under the Alquist-Priolo Act in 1977. The Pasadena and Condor Peak USGS Quadrangles have not yet been mapped per the Alquist-Priolo Act.

These Alquist-Priolo maps show only one Fault Zone in or adjacent to the City of Pasadena, the Raymond (Hill) Fault Alquist-Priolo Earthquake Fault Zone. This fault is located primarily south of City limits, however, the southernmost portions of the City lie within the fault’s mapped Fault Zone. The 2002 Safety Element of the City’s General Plan identifies the following three additional zones of potential fault rupture in the City:

- The Eagle Rock Fault Hazard Management Zone, which traverses the southwestern portion of the City;
- The Sierra Madre Fault Hazard Management Zone, which includes the Tujunga Fault, the North Sawpit Fault, and the South Branch of the San Gabriel Fault. This Fault Zone is primarily north of the City, and only the very northeast portion of the City and portions of the Upper Arroyo lie within the mapped fault zone.
- A Possible Active Strand of the Sierra Madre Fault, which appears to join a continuation of the Sycamore Canyon Fault. This fault area traverses the northern portion of the City as is identified as a Fault Hazard Management Zone for Critical Facilities Only.

The project site is not within any of these potential fault rupture zones. The closest mapped fault zone, a Possible Active Strand of the Sierra Madre Fault, is approximately 1 mile east from the project site. Therefore, the proposed project would not expose people or structures to potential substantial adverse

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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effects caused by the rupture of a known fault. No related significant impacts would result from the proposed project.

ii. *Strong seismic ground shaking?* ()

WHY? See 9.a.i.

Since the City of Pasadena is within a larger area traversed by active fault systems, such as the San Andreas and Newport-Inglewood Faults, any major earthquake along these systems will cause seismic ground shaking in Pasadena. Much of the City is on sandy, stony or gravelly loam formed on the alluvial fan adjacent to the San Gabriel Mountains. This soil is more porous and loosely compacted than bedrock, and thus subject to greater impacts from seismic ground shaking than bedrock.

The risk of earthquake damage is minimized because new structures shall be built according to the Uniform Building Code and other applicable codes, and are subject to inspection during construction. Structures for human habitation must be designed to meet or exceed California Uniform Building Code standards for Seismic Zone 4. Conforming to these required standards will ensure the proposed project would not result in significant impacts due to strong seismic ground shaking.

iii. *Seismic-related ground failure, including liquefaction as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of liquefaction?* ()

WHY? The project site is not within a Liquefaction Hazard Zone or Landslide Hazard Zone as shown on Plate P-1 of the 2002 Safety Element of the General Plan. This Plate was developed considering the Liquefaction and Earthquake-Induced Landslide areas as shown on the State of California Seismic Hazard Zone maps for the City. Therefore, the project will have no impacts from seismic related ground failure.

iv. *Landslides as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of landslides?*
()

WHY? The project site is not within a Landslide Hazard Zone as shown on Plate P-1 of the 2002 Safety Element of the General Plan. This Plate was developed considering the Earthquake-Induced Landslide areas as shown on the State of California Seismic Hazard Zone maps for the City. Therefore, the project will have no impacts from seismic induced landslides.

b. *Result in substantial soil erosion or the loss of topsoil?* ()

Potentially Significant Impact

Significant Unless Mitigation is Incorporated

Less Than Significant Impact

No Impact

WHY? (*Excavation and Grading*) Construction of the project will lead to 21,967 cubic yards of fill. The project will cover approximately 95% of the site as compared to the present use, which occupies 100% of the site. The existing building regulations and property site inspections ensure that construction activities do not create unstable earth conditions.

The displacement of soil through cut and fill will be controlled by the City's grading ordinance, Chapter 33 of the 2001 California Building Code relating to grading and excavation, the HD Hillside Development Overlay District regulations, other applicable building regulations and standard construction techniques; therefore there will be no impact.

The natural water erosion potential of soils in Pasadena is low, unless these soils are disturbed during the wet season. Both the Ramona and Hanford soils associations, which underlay much of the City, have high permeability, low surface runoff and slight erosion hazard due to the gravelly surface layer and low topographic relief away from the steeper foothill areas of the San Gabriel Mountains.

Water erosion during construction will be minimized by limiting construction to dry weather, covering exposed excavated dirt during periods of rain and protecting excavated areas from flooding with temporary berms. Soil erosion after construction will be controlled by implementation of an approved landscape and irrigation plan. This plan shall be submitted to the Zoning Administrator (or the appropriate staff) for review and approval prior to the issuance of a building permit.

Construction may temporarily expose the soil to wind and/or water erosion. Erosion caused by strong wind, excavation and earth moving operations will be minimized by watering during construction and by covering earth to be transported in trucks to or from the site.

Any project, which involves more than 250 cubic yards of cut or fill should have an erosion and sediment transport control plan as part of the applicant's grading plan. The grading plan must be approved by the Building Official and the Public Works Department prior to the issuance of any building permits.

- c. *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?* ()

WHY? The City of Pasadena rests primarily on an alluvial plain. To the north the San Gabriel Mountains are relatively new in geological time. These mountains run generally east-west and have the San Andreas Fault on the north and the Sierra Madre Fault to the south. The action of these two faults in conjunction with the north-south compression of the San Andreas tectonic plate is pushing up the San Gabriel Mountains. This uplifting combined with erosion has helped form the alluvial plain. As shown on Plate 2-4 of the Technical Background Report to the 2002 Safety Element, the majority of the City lies on the flat portion of the alluvial fan, which is expected to be stable.

The proposed project is not located on known unstable soils or geologic units, and therefore, would not likely cause on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse. Modern engineering practices and compliance with established building standards, including the California Building Code, will ensure the project will not cause any significant impacts from unstable geologic units or soils.