

**ATTACHMENT E  
FINAL INITIAL STUDY**

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

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**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: Waverly High School
2. Lead Agency Name and Address: City of Pasadena Planning Division, 175 N. Garfield Ave., Pasadena, CA 91191-1704
3. Contact Person and Phone Number: John Steinmeyer, (626) 744-6880
4. Project Location: 94-112 Waverly Drive, Pasadena, CA
5. Project Sponsor's Name and Address: Waverly School, 67 W. Bellevue Dr., Pasadena, CA 91105
6. General Plan Designation: Central District Specific Plan
7. Zoning: CD-6

*Description of the Project:* The proposal is to develop a private high school campus for 120 students. The project includes: conversion of five existing residential structures into classrooms; relocation of an existing residential structure within the site and its conversion into classrooms; relocation of an off-premises existing residential structure onto the project site and its conversion into classrooms; demolition of two residential structures and two garages; and the construction of a three-story, multi-purpose building of ~~40,256~~40,256,~~712~~712 square feet. The total square footage of all buildings is ~~47,290~~47,290,~~746~~746. The project proposes a total of 25 parking spaces on the site. Vehicular access to the site is on Waverly Drive and May Alley.

Six of the retained structures, including the residential structure to be relocated onto the site, are eligible for landmark designation under the City's Historic Preservation Ordinance. None of the structures proposed for demolition is eligible for landmark designation.

The project requires the following entitlements: Conditional Use Permit for a school use in the CD-6 zoning district; Variance for parking in the front yard; Variance to deviate from ~~aisle width and back-up turning radius for parking~~loading; Variance to deviate from landscaping standards for parking lots; Minor Conditional Use Permit for tandem parking spaces; application for Private Tree Removal of one protected specimen tree.

8. Surrounding Land Uses and Setting: Waverly Street between Pasadena Avenue and North Fair Oaks Avenue is developed predominantly with industrial uses with some office uses. Waverly Elementary School is located between Bellevue Drive and May Alley, approximately 100 feet from the subject site.
9. Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement): Design Commission; Department of Public Works; Department of Transportation; Building Division.

**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" as indicated by the checklist on the following pages.

	Aesthetics		Geology and Soils		Population and Housing
	Agricultural Resources		Hazards and Hazardous Materials		Public Services
	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		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.	

Prepared By/Date \_\_\_\_\_

Reviewed By/Date \_\_\_\_\_

Printed Name \_\_\_\_\_

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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Potentially  
Significant  
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Significant  
Unless  
Mitigation is  
Incorporated

Less Than  
Significant  
Impact

No Impact

## SECTION II - ENVIRONMENTAL CHECKLIST FORM

### 1. BACKGROUND.

Date checklist submitted: ~~September 26~~ November 16, 2005

Department requiring checklist: Planning and Development

Case Manager: John Steinmeyer

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

Potentially  
Significant  
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Significant  
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Less Than  
Significant  
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No Impact

### 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 limited views of the San Gabriel Mountains. The existing development in the vicinity of the project site consists of industrial, office, and institutional buildings ranging from one to three stories in height. The proposed development will consist of predominantly of one- and two-story buildings and one three-story building with a height of 32'-8". The height, setbacks, and massing of the proposed development comply with the Zoning Code and General Plan, and they are in character with existing surrounding development.

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. Therefore, the proposed project would have no impacts to state scenic highways or scenic roadway corridors.

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

**WHY?** The proposed project consists of the addition of two buildings to the site: a relocated two-story building of 2,402 square feet and a new, three-story building of 10,256 square feet. Five buildings with a  
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<b>Potentially Significant Impact</b>	<b>Significant Unless Mitigation is Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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total of 4,632 square feet will be retained on the site. All of the existing buildings will be renovated and refurbished for institutional uses in a traditional school campus setting. The proposed project is within the height and mass limitations of the Zoning Code and is required to submit a landscape plan for review and approval by the Zoning Hearing Officer and the Design Commission prior to the issuance of any building permits. Approval of the proposed project would not lead to any demonstrable negative aesthetic impact.

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 additional layer of review for aesthetics, and an opportunity to incorporate additional conditions to increase the aesthetic value of the project.

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 direction of any outdoor lighting and the screening of mechanical equipment must conform to Zoning Code requirements. The project does not propose any lighting for nighttime events or sporting activities. The outdoor lighting included in the project includes pedestrian safety lighting, landscaping lights, parking lot lamps, and possibly street lights that may be required by the Public Works Department. The project is in a developed industrial and office area with streetlights in place, and the proposed exterior lighting would be consistent with the surrounding area. These lights are not substantial sources of glare and are an aide to public safety.

Exterior and interior lights and reflective building materials may be potential sources of light and glare. Use of reflective materials shall conform to Zoning Code requirements and to evaluations of exterior cladding and materials through the City’s design review process. Interior lighting would not shine onto surrounding properties, since most activity would occur during daylight hours; and all proposed exterior lighting is typical safety, landscape, and signage lighting, which are required to comply with the outdoor lighting standards in the zoning code. No surrounding uses are expected to be affected by glare from the reflective building materials since the majority of the building materials are plaster and wood, which have low amounts of reflectivity.

The majority of the buildings on the site are one and two stories. One, three-story building, located on the southern portion of the property, is 32’-8” in height. All proposed building heights are within the height limit permitted in the CD-6 zoning district. The surrounding uses include buildings 12’-35’ in height. The proposed project may cast shadows on adjacent sites; however, no significant impact is expected to occur since this shadow pattern may only affect portions of the adjacent properties to the west and east, respectively, for one to two hours during the day.

The design of this project, including its finish, colors, and materials, 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.

**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

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

- 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.

**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? ( )*

                        
 
                         
 
                         

**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



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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 consistent with the Zoning and General Plan Land Use designations for the site. As a result, the project is consistent with the growth expectations for the region. The proposed project is therefore consistent with the AQMP and the West San Gabriel Valley Air Quality Plan, and would have no associated impacts.

b. *Violate any air quality standard or contribute to an existing or projected air quality violation?* ( )

                        
 
                         
 
                         

**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. However, the project itself is well below the South Coast Air Quality Management District's (SCAQMD) land use, construction, and mobile emission thresholds for significant air quality impacts, according to the 1993 updated SCAQMD's CEQA Air Quality Handbook. Therefore, the proposed project would not violate and air quality standard or substantially contribute to an existing or projected air quality violation, and would have no related significant impacts.

The project's potential vehicle induced air pollutants would be reduced due to required compliance with the City's Trip Reduction Ordinance (see use and sq. ft. thresholds in ordinance). Compliance with this ordinance will lower the emissions from vehicles by reducing the expected number of vehicle trips per day generated by the project. Under this Ordinance, the applicant will be required prepare and submit a Transportation System Management (TSM) Plan showing how the trips will be reduced. This plan will be reviewed and approved by the Transportation Department, prior to the issuance of a building permit.

The traffic study, prepared for this project, states that the project will generate 298 number of vehicle trips per day.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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According to the 1993 updated SCAQMD's CEQA Air Quality Handbook Table 9-1 project emissions during construction will not exceed the district threshold for construction emissions.

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)? ( )*

                        
 
                         
 
                         

**WHY?** The City of Pasadena is within the South Coast Air Basin (SCAB). This basin is a non-attainment area for Ozone (O<sub>3</sub>), Fine Particulate Matter (PM<sub>2.5</sub>), Respirable Particulate Matter (PM<sub>10</sub>), and Carbon Monoxide (CO), and is in a maintenance area for Nitrogen Dioxide (NO<sub>2</sub>). Projects that contribute to a significant cumulative increase in O<sub>3</sub>, PM<sub>2.5</sub>, PM<sub>10</sub>, CO, or NO<sub>2</sub> will be considered to be significant and require the consideration of mitigation measures.

As shown in Section 5.b, the proposed project will not exceed the SCAQMD's Thresholds for 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 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? ( )*

                        
 
                         
 
                         

**WHY?** According to Figure 5-1 and Table 5-1 of the 1993 SCAQMD's CEQA Air Quality Handbook the project is located near one sensitive receptor, Waverly Elementary School, which is located approximately 100 feet southeast of the project site. However, the project is not likely to generate any significant toxic air emissions.

The proposed project would consist of a high school for 120 students, which is a sensitive receptor to toxic air pollution. However, none of the site's surrounding land uses generate toxic air pollutants. In addition, the project site is not in the vicinity of a congested intersection or otherwise in the vicinity of a CO hotspot. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations, and the project would have no associated impacts.

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

                        
 
                         
 
                         

**WHY?** 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:

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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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?* ( )

                        
 
                         
 
                         

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.

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 not located near any of these natural habitat areas.

The project is located in a developed urban area. The only vegetation present on site is landscaping. The project site and surrounding area do not include any vegetation that constitutes a plant community.

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?** Drainage courses with definable bed and bank and their adjacent wetlands are “waters of the United States” and fall under the jurisdiction of the U.S. Army Corps of Engineers (USACE) in accordance with Section 404 of the Clean Water Act. Jurisdictional wetlands, as defined by the USACE are lands that, during normal conditions, possess hydric soils, are dominated by wetland vegetation, and are inundated with water for a portion of the growing season.

The project site does not include any discernable drainage courses, inundated areas, wetland vegetation, or hydric soils, and thus does not include USACE jurisdictional drainages or wetlands. Therefore, the proposed project would have no impact to federally protected wetlands as defined by Section 404 of the Clean Water Act.

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?* ( )

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

**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". The site contains three trees protected by the Ordinance No. 6896 "City Trees and Tree Protection Ordinance" as detailed in the table below:

#	Genus & Species	Common Name	Diameter	Remain	Move	Replace	Remove
1	Acacia baileyana	Purple Bailey Acacia	30"	REMAIN			
2	Fraxinus oxycarpa	Raywood Ash	30"				REMOVE
	Quercus agrifolia	Coast Live Oak	20"	REMAIN			

The site is presently developed with residential uses and open spaces with trees. The project proposes removal of one specimen tree, a Fraxinus oxycarpa (Raywood Ash) that is protected by the City of Pasadena Tree Protection Ordinance. In order to permit removal of one or more protected trees, the application is required to comply with the Tree Protection Ordinance by meeting at least one applicable finding. In this project, the tree canopy coverage in the proposed landscape plan will exceed, in 5 years, the existing tree canopy coverage on the project site. Therefore, the project complies with the Tree Protection Ordinance, Finding #6: *The project includes a landscape plan that 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.* In addition, the Public Works Department will require the applicant to plant and maintain the officially designated street tree, if any street tree vacancies exist.

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.

**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? ( )

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The project site is developed with ten structures: eight residential units and two garages. According to the Pasadena Central District Historic Resources Survey (2004), two historic resources that are eligible for local landmark designation (NRHP rating 5S2) exist on the site: a bungalow court of four, identical, vernacular Craftsman Style, 1-story, wood frame and clapboard units, constructed 1924-25; and a 2-story, wood frame and clapboard house (Trull House) with vernacular architectural characteristics of the Victorian and Eastlake Styles, constructed ca. 1890. The project proposes retention, rehabilitation, and preservation of the existing historic resources in their current, respective locations. In addition, the project proposes the relocation of another historic resource, the Dearth House (one-and-one-half story, wood frame, clapboard and shingle house, vernacular Queen Anne Style, 1893, NRHP rating 5S2) from 144 Valley Street to the project site. The Dearth House would be rehabilitated and restored and incorporated into the campus-like site plan with the other vintage structures.

The Dearth House is currently located on a street with light industrial and commercial land uses and structures. The former late-19<sup>th</sup>/early 20<sup>th</sup> century residential character of the street no longer exists in the vicinity. Therefore, the house has diminished integrity because of its current, non-original context. Although the House would be moved to a different location within the Central District, the host site of existing vintage structures is an appropriate setting for the historic resource. Guidelines from the U.S. Dept. of the Interior, National Register, provide the justification for determining the effect of relocation on the significance of a historic resource. "Criteria Consideration B: Moved Properties" states: "A property removed from its original or historically significant location can be eligible if it is significant primarily for architectural value." To retain significance, a property that is relocated must "retain enough historic features to convey its architectural values and retain integrity of design, materials, workmanship, feeling, and association."

Any potentially significant impacts on the historic resources on the project site or the Dearth House would be reduced to a level of insignificance because the structures the rehabilitations, restorations, and new construction re-used according to the Secretary of the Interior's Standards for Rehabilitation, which would be applied by the Design Commission during Design Review.

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 has been used for residential uses since the late-19<sup>th</sup> century. 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.

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

**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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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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. The proposed intensity of the project is within the intensity allowed by the Zoning Code and 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). 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? (Oil-based products.)** The proposed project will not create a high enough demand for energy to require development of new energy sources. Construction of the project will result in a short-term insignificant consumption of oil-based energy products. However, the additional amount of resources used will not cause a significant reduction in available supplies.

Consumption of gasoline by project-generated vehicles will be reduced by adherence to the Trip Reduction Ordinance to a level that is not significant.

**(Energy).** 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 approximately 66 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

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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.

Installation of energy-saving features will be inspected by a Building Inspector prior to issuance of a Certificate of Occupancy.

(Water) This project will result an decrease of approximately 351-405 gallons per day in water consumption. The current single-family residential uses consume approximately 2,080 gallons of water per day; the proposed institutional use would consume approximately 1,7291,675 gallons of water per day. The project would be required during drought periods to adhere to 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.

<b>Potentially Significant Impact</b>	<b>Significant Unless Mitigation is Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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The project site is not within any of these potential fault rupture zones. The closest mapped fault zone, the Eagle Rock Fault Zone, is 2 miles south of the project site. Therefore, the proposed project would not expose people or structures to potential substantial adverse 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?** 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?* ( )

                        
 
                         
 
                         

**WHY?** (*Excavation and Grading*) Construction of the project will lead to 0 cubic yards of fill and 760 cubic yards of cut to be exported from the site. The project, including building footprints and hardscape, will cover



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approximately 48% of the site, almost nearly identical to the building footprint and hardscape coverage as the present use. 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. The applicant must have an approved site to receive any exported cut earth. 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 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.

Since the project proposed removal of more than 250 cubic yards of cut, the applicant shall have a 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.

d. *Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?* ( )

Potentially Significant Impact

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Less Than Significant Impact

No Impact

**WHY?** According to the 2002 adopted Safety Element of the City's General Plan the project site is underlain by alluvial material from the San Gabriel Mountains. This soil consists primarily of sand and gravel and is in the low to moderate range for expansion potential.

- e. *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? ( )*

**WHY?** The project will be required to connect to the existing sewer system. Therefore, soil suitability for septic tanks or alternative wastewater disposal systems is not applicable in this case, and the proposed project would have no associated impacts.

**10. HAZARDS AND HAZARDOUS MATERIALS.** Would the project:

- a. *Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials? ( )*

**WHY?** The project does not involve the use or storage of hazardous substances other than the small amounts of pesticides, fertilizers and cleaning agents required for normal maintenance of the structure and landscaping. The project must adhere to applicable zoning and fire regulations regarding the use and storage of any hazardous substances. Further there is no evidence that the site has been used for underground storage of hazardous materials.

- b. *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? ( )*

**WHY?** The project does not involve hazardous materials. Therefore, there is no significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, which could release hazardous material.

- c. *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? ( )*

**WHY?** The project does not involve hazardous emissions or the handling of hazardous materials, substance, or waste, except for the substances identified in 10a. Although the project proposal is a school, and the site is located within one-quarter mile of the existing Waverly Elementary School, proposed project would have no hazardous material related impacts to schools.

Potentially Significant Impact

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Less Than Significant Impact

No Impact

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? ( )

WHY? The project site is not located on the State of California Hazardous Waste and Substances Sites List of sites published by California Environmental Protection Agency (CAL/EPA). The site has used for residential purposes since the late-19th century, which is not a land use associated with hazardous materials. The site is not known or anticipated to have been contaminated with hazardous materials and no hazardous material storage facilities are known to exist onsite.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? ( )

WHY? The project site is not within an airport land use plan or within two miles of a public airport or public use airport. The nearest public use airport is the Bob Hope Airport in Burbank, which is operated by a Joint Powers Authority with representatives from the Cities of Burbank, Glendale and Pasadena. Therefore, the proposed project would not result in a safety hazard for people residing or working in the vicinity of an airport and would have no associated impacts.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? ( )

WHY? The project site is not within the vicinity of a private airstrip. Therefore, the proposed project would not result in a safety hazard for people residing or working in the vicinity of a private airstrip and would have no associated impacts.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? ( )

WHY? The construction and operation of the proposed project would not place any permanent or temporary physical barriers on any existing public streets. To ensure compliance with zoning, building and fire codes, the applicant is required to submit appropriate plans for plan review prior to the issuance of a building permit. Adherence to these requirements ensures that the project will not have a significant impact on emergency response and evacuation plans.

The City of Pasadena maintains a citywide emergency response plan, which goes into effect at the onset of a major disaster (e.g., a major earthquake). The Pasadena Fire Department maintains the disaster plan. In case of a disaster, the Fire Department is responsible for implementing the plan, and the Pasadena Police Department devises evacuation routes based on the specific circumstance of the emergency. The City has pre-planned evacuation routes for dam inundation areas associated with Devil's Gate Dam, Eaton Wash, and the Jones Reservoir.

<b>Potentially Significant Impact</b>	<b>Significant Unless Mitigation is Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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*h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? ( )*

                        
 
                         
 
                         

**WHY?** As shown on Plate P-2 of the 2002 Safety Element, the project site is not in an area of moderate or very high fire hazard. In addition, the project site is surrounded by urban development and not adjacent to any wildlands. Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury or death involving wild land fires, and the project would have no associated impacts.

**11. HYDROLOGY AND WATER QUALITY.** Would the project:

*a. Violate any water quality standards or waste discharge requirements? ( )*

                        
 
                         
 
                         

**WHY?** Section 303 of the federal Clean Water Act requires states to develop water quality standards to protect the beneficial uses of receiving waters. In accordance with California’s Porter/Cologne Act, the Regional Water Quality Control Boards (RWQCBs) of the State Water Resources Control Board (SWRCB) are required to develop water quality objectives that ensure their region meets the requirements of Section 303 of the Clean Water Act.

Pasadena is within the greater Los Angeles River watershed, and thus, within the jurisdiction of the Los Angeles RWQCB. The Los Angeles RWQCB adopted water quality objectives in its Stormwater Quality Management Plan (SQMP). This SQMP is designed to ensure stormwater achieves compliance with receiving water limitations. Thus, stormwater generated by a development that complies with the SQMP does not exceed the limitations of receiving waters, and thus does not exceed water quality standards.

Compliance with the SQMP is ensured by Section 402 of the Clean Water Act, which is known as the National Pollution Discharge Elimination System (NPDES). Under this section, municipalities are required to obtain permits for the water pollution generated by stormwater in their jurisdiction. These permits are known as Municipal Separate Storm Sewer Systems (MS4) permits. Los Angeles County and 85 incorporated Cities therein, including the City of Pasadena, obtained an MS4 (Permit # 01-182) from the Los Angeles RWQCB, most recently in 2001. Under this MS4, each permitted municipality is required to implement the SQMP.

In accordance with the County-wide MS4 permit, all new developments must comply with the SQMP. In addition, as required by the MS4 permit, the City of Pasadena has adopted a Standard Urban Stormwater Mitigation Plan (SUSMP) ordinance to ensure new developments comply with SQMP. This ordinance requires most new developments to submit a plan to the City that demonstrates how the project will comply with the City’s SUSMP.

The project consists of developing a private high school for 120 students, an institutional use. The propose is not a point source generators of water pollutants, and thus, no quantifiable water quality standards apply to the project. As an urban development, the proposed project would add typical, urban, nonpoint-source pollutants to storm water runoff. As discussed, these pollutants are permitted by the County-wide MS4 permit, and would not exceed any receiving water limitations. Furthermore, the proposed development does not meet the City’s SUSMP requirement thresholds, and thus, water pollutants generated from the

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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development are considered negligible. Therefore, the proposed project would not violate any water quality standards or waste discharge requirements, and would have no related significant impacts.

b. *Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? ( )*

                        
 
                         
 
                         

**WHY?** The project would not install any groundwater wells, and would not otherwise directly withdraw any groundwater. In addition, there are no known aquifer conditions at the project site or in the surrounding area, which could be intercepted by excavation or development of the project. Therefore, the proposed project would not physically interfere with any groundwater supplies.

The project will use the existing water supply system provided by the Pasadena Department of Water and Power. The source of some of this water supply is ground water, stored in the Raymond Basin. Thus, the project could indirectly withdraw groundwater. However, the proposed water usage would be negligible in comparison to the overall water service provided by the Department of Water and Power. This minor amount of water use would not result in significant impacts from depletion of groundwater supplies. Under normal operation the project will use approximately 4,7291,675 gallons of water per day.

During drought conditions, the project must comply with the Water Shortage Procedures Ordinance (Chapter 13 of the Pasadena Municipal Code) the project shall only consume 90% of expected consumption. To ensure compliance with this ordinance, the applicant shall submit a water conservation plan limiting the project's water consumption to 90% of expected consumption. This plan shall be submitted to and approved by the City's Water and Power Department and the Building Division prior to the issuance of a building permit. The applicant's irrigation and plumbing plans shall comply with the approved water conservation plan.

c. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on-or off-site? ( )*

                        
 
                         
 
                         

**WHY?** The project site is currently almost flat and runoff onsite drains as sheet flow from north to south. The project site does not contain any discernable streams, rivers, or other drainage features. Development of the site will involve minor grading, but will not substantially alter the drainage pattern of the site or surrounding area.

The drainage of surface water from the project will be controlled by building regulations and directed towards the City's existing streets, flood control channels, storm drains and catch basins. Prior to the issuance of a building permit, the applicant is required to submit a site drainage plan to the Building Division and the Public Works Department for review and approval. This required approval ensures that the proposed drainage plan is appropriately designed and that the proposed runoff does not exceed the capacity of the City's storm drain system. The proposed drainage of the site would not channel runoff on exposed soil, would not direct flows over unvegetated soils, and would not otherwise increase the erosion or siltation potential of the site or any downstream areas. Therefore, the proposed project would not result in significant erosion or siltation impacts from changes to drainage patterns.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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d. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site? ( )*

                        
 
                         
 
                         

**WHY?** As discussed, the project would involve only minor changes in the site’s drainage patterns and does not involve altering a discernable drainage course. The proposed minor changes to the site’s drainage patterns are not expected to cause flooding. Regardless, the project’s potential to cause flooding would be eliminated through the required compliance with the City’s SUSMP ordinance. This ordinance requires post-development peak storm water runoff rates to not exceed pre-development peak storm water runoff rates. Compliance with this SUSMP requirement will be ensured through the City’s drainage plan review and approval process.

Since the project does not involve alteration of a discernable watercourse and post-development runoff discharge rates are required to not exceed pre-development rates, the proposed project does not have the potential to alter drainage patterns or increase runoff that would result in flooding. Therefore, the proposed project would not cause flooding and would have no associated impacts.

e. *Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? ( )*

                        
 
                         
 
                         

**WHY?** The proposed project could increase runoff by increasing the impermeable surfaces onsite. However, as discussed above in Sections 11.c) and 11.d), compliance with the City’s SUSMP ordinance would ensure that post-development peak storm water runoff rates to not exceed pre-development peak storm water runoff rates. Therefore, the City’s existing storm drain system can adequately serve the proposed development.

Similarly, as discussed above in Sections 11.a) and 11.c), the project would generate only typical, non-point source, urban stormwater pollutants. These pollutants are covered by the County-wide MS4 permit, and the project, through the City’s SUSMP ordinance, is required to implement BMPs to reduce stormwater pollutants to the maximum extent practicable. Therefore, the proposed project would not create runoff that would exceed the capacity of the storm drain system and would not provide a substantial additional source of polluted runoff.

f. *Otherwise substantially degrade water quality? ( )*

                        
 
                         
 
                         

**WHY?** As discussed above, the proposed development will not be a point-source generator of water pollutants. The only long-term water pollutants expected to be generated onsite are typical urban stormwater pollutants. Compliance with the City’s SUSMP ordinance will ensure these stormwater pollutants would not substantially degrade water quality.

The project, however, also has the potential to generate short-term water pollutants during construction, including sediment, trash, construction materials, and equipment fluids. The County-wide MS4 permit requires construction sites to implement BMPs to reduce the potential for construction-induced water pollutant impacts. These BMPs include methods to prevent contaminated construction site stormwater from

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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entering the drainage system and preventing construction-induced contaminants from entering the drainage system. The MS4 identifies the following minimum requirements for construction sites in Los Angeles County:

1. Sediments generated on the project site shall be retained using adequate Treatment Control or Structural BMPs;
2. Construction-related materials, wastes, spills or residues shall be retained at the project site to avoid discharge to streets, drainage facilities, receiving waters, or adjacent properties by wind or runoff;
3. Non-storm water runoff from equipment and vehicle washing and any other activity shall be contained at the project site; and
4. Erosion from slopes and channels shall be controlled by implementing an effective combination of BMPs (as approved in Regional Board Resolution No. 99-03), such as the limiting of grading scheduled during the wet season; inspecting graded areas during rain events; planting and maintenance of vegetation on slopes; and covering erosion susceptible slopes.

Complying with the both the MS4's construction site requirements and the State's General Construction Permit, as well as implementing an SWPPP will ensure that construction of the proposed project would not substantially degrade water quality

*g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or dam inundation area as shown in the City of Pasadena adopted Safety Element of the General Plan or other flood or inundation delineation map? ( )*

                        
 
                         
 
                         

**WHY?** No portions of the City of Pasadena are within a 100-year floodplain identified by the Federal Emergency Management Agency (FEMA). As shown on FEMA map Community Number 065050, the entire City is in Zone D, for which no floodplain management regulations are required. In addition, according to the City's Dam Failure Inundation Map (Plate 3-1, of the adopted 2002 Safety Element of the City's General Plan) the project is not located in a dam inundation area.

The proposed project involves the development of a private high school for 120 students. Therefore, the project would not place housing within a flood hazard area or dam inundation area, and the project would have no related impacts.

*h. Place within a 100-year flood hazard area structures, which would impede or redirect flood flows? ( )*

                        
 
                         
 
                         

**WHY?** No portions of the City of Pasadena are within a 100-year floodplain identified by the Federal Emergency Management Agency (FEMA). As shown on FEMA map Community Number 065050, the entire City is in Zone D, for which no floodplain management regulations are required. Therefore, the proposed project would not place structures within the flow of the 100-year flood, and the project would have no related impacts.

*i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? ( )*

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**WHY?** No portions of the City of Pasadena are within a 100-year floodplain identified by the Federal Emergency Management Agency (FEMA). As shown on FEMA map Community Number 065050, the entire City is in Zone D, for which no floodplain management regulations are required. In addition, according to the City's Dam Failure Inundation Map (Plate P-2, of the adopted 2002 Safety Element of the City's General Plan) the project is not located in a dam inundation area. Therefore, the project would not have a significant impact from exposing people or structures to flooding risks, including flooding as a result of the failure of a levee or dam.

j. Inundation by seiche, tsunami, or mudflow? ( )

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**WHY?** The City of Pasadena is not located near enough to any inland bodies of water or the Pacific Ocean to be inundated by either a seiche or tsunami. For mudflow see responses to 9. Geology and Soils a. iii and iv regarding seismic hazards such as liquefaction and landslides.

**12. LAND USE AND PLANNING.** Would the project:

a. Physically divide an existing community? ( )

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**WHY?** The project will not physically divide an existing community, as the site is surrounded by similar development on all sides, and the project consists of an infill development within a highly urbanized area. No adverse impact will result.

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? ( )

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** The proposed school use is a conditional use in the CD-6 zoning district and the Arroyo Corridor/Fair Oaks General Plan Land Use Designation in the adopted 2004 Land Use Element. Therefore, an application for a Conditional Use Permit has been submitted. The development of the high school will further Objective #13 (Adequate Services) of the General Plan in that the City supports institutions that serve the needs of Pasadena's diverse residents and families. It is also consistent with Policy 13.4 (Education), which promotes public and private schools, and supports quality education for all students.

The proposal complies with all height, setback, and density requirements of the zoning code. However, the proposal does not comply with some zoning code requirements regarding parking and landscaping. Therefore, four additional applications for discretionary approvals have been submitted: Variance for a parking lot between the street and the buildings; Variance to deviate from aisle width and back-up turning radius for parking; Variance to deviate from landscaping standards for parking lots; and Minor Conditional Use Permit for tandem parking spaces. It is common for infill development projects to request Variances and Minor Conditional Use Permits. These applications will be reviewed by the Zoning Hearing Officer to ensure that the meets the required findings for such discretionary approvals and may require conditions of approval to ensure the health, safety, and welfare of the community.