#### ATTACHMENT E

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

# DRAFT INITIAL STUDY (REVISED)

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: 220 North San Rafael Avenue

2. Lead Agency Name and Address: City of Pasadena

Department of Planning & Development

175 N. Garfield Avenue Pasadena, CA 91101

3. Contact Person and Phone Number: Robert Avila (626) 744-6706

4. Project Location: 220 N. San Rafael Avenue, Pasadena

5. Project Sponsor's Name and Address: James Rodney Youngson

Youngson Company

8648 Holloway Plaza Drive Los Angeles, CA 90069

6. General Plan Designation: Institutional

7. Zoning: PS (Public and Semi-Public District)

8. Description of the Project: The proposed project involves four actions. The first action is a General Plan Amendment to change the existing "Institutional" general plan designation to Low Density Residential (0-6 du/net acre). The second action is a Zoning Map Amendment to change the existing zoning from PS (Public/Semi-Public District) to RS-2-HD (Single-family Residential/ 2 du/net acre/Hillside Overlay). The third action is a proposed subdivision to split the existing 129,718 square foot parcel into two lots—Parcel A would measure approximately 104,108 square feet; Parcel B would measure approximately 25,610 square feet. The fourth and final action is a variance request for Parcels A and B, to allow these lots to be created with less than the required width of 100 feet. The new residentially zoned parcels would eventually be developed with single-family residences. All four actions will be reviewed concurrently by the City of Pasadena.

The project site is located at 220 N. San Rafael Avenue, Pasadena in the County of Los Angeles. The lot encompasses a small canyon that is the location of the former Richter Research Laboratory operated by the California Institute of Technology. The site is developed with a 6,476 square foot

- laboratory structure and a 1,304 square foot garage designed by prominent architect Reginald Johnson and completed in 1925-26. The project site is presently accessed from San Rafael Avenue.
- 9. Surrounding Land Uses and Setting: The project site is located in west Pasadena along the southerly end of the San Rafael Hills, across San Rafael Avenue from the Annandale Country Club at Chateau Road. The surrounding land uses to the east, west and north are primarily large single-family residences on large parcels of at least 20,000 square feet, and the open space of the Annandale Country Club is located to the south of the project site.
- 10. Other public agencies whose approval is required: The proposed project would require advisory reviews from the Historic Preservation and Planning Commissions. Final review of the proposed project would be conducted by the Pasadena City Council.

220 N. San Rafael Ave.

### **ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below would involve 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<br>Hazardous Materials | Public Services                       |  |
| Air Quality            | Hydrology and Water Quality        | Recreation                            |  |
| Biological Resources   | Land Use and Planning              | Transportation/Traffic                |  |
| Cultural Resources     | Mineral Resources                  | Utilities and Service<br>Systems      |  |
| Energy                 | Noise                              | Mandatory Findings of<br>Significance |  |

**DETERMINATION:** (to be completed by the Lead Agency)

On the basis of this initial evaluation:

| I find that the proposed project DOES NOT have DECLARATION will be prepared.                    | e a significant effect on the environment, and a NEGATIVE   | <b>√</b> |
|---|---|----------|
|   | nave a significant effect on the environment, there will not be gation measures described on an attached sheet have been EDECLARATION will be prepared. |          |
| Study shows that one or more impact areas will I  | ed, but it must analyze only the effects that were not  |          |
| potentially significant effects (a) have been analy DECLARATION pursuant to applicable standard | ds, and (b) have been avoided or mitigated pursuant to that ding revisions or mitigation measures that are imposed                                      |          |
|   |   |          |
| 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. A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 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

Significant Unless Mitigation is Incorporated

Less Than Significant Impact

No Impact

## SECTION II - ENVIRONMENTAL CHECKLIST FORM

| 1.                      | BACKGROUND.  Date checklist submitted Department requiring che Planner assigned:  |   | er 15, 2005 (Revis   | ed)   |   |  |  |
|-------------------------|---|---|--|---|---|--|--|
| 2.                      | ENVIRONMENTAL IMPACTS.  | (explanations o   | f all answers are re   | equired):   |   |  |  |
|                         |   | Potentially<br>Significant<br>Impact                      | Significant<br>Unless<br>Mitigation is<br>Incorporated               | Less Than<br>Significant<br>Impact                                  | No Impact   |  |  |
| 3.                      | AESTHETICS. Would the proj  | ect:  |  |   |   |  |  |
|                         | a. Have a substantial advers  | se effect on a sc   | enic vista? (17)   |   |   |  |  |
|                         | ·   |   |  |   | $\boxtimes$   |  |  |
| trees<br>the p<br>Resid | WHY? The project site is in an area located near the southerly base of the San Rafael Hills. This area contains structures ranging from 1 to 2 stories in height (approximately 36-feet) and dense growth of maturities which obstruct views throughout the vicinity. Potential new residential development that may occur of the project site would have to meet the height and mass limitations of the Zoning Code (Single-Family Residential Development and Hillside Development Standards).  The project does not substantially impact any scenic vista as defined in the 2004 final EIR for the Land Use and Mobility Elements of the City of Pasadena General Plan.  b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings,  |   |  |   |   |  |  |
|                         | and historic buildings with   |   | c highway? (23)  | $\boxtimes$   |   |  |  |
|                         | 7? The project does not substant of the project does not substa |   |  |   | unty  |  |  |
| Syca<br>the p<br>area   | proposed project would not resumore Trees. The proposed par<br>project site) depicts a building pa<br>where development currently de<br>mum 25-foot front yard set back<br>ime.   | cel map, the por<br>id would be deve<br>oes not exist. Th | tion identified as P<br>eloped with a single<br>ne potential buildin | arcel B (the southw<br>e-family residence o<br>g pad is located bel | esterly portion of<br>on a relatively flat<br>nind the required |  |  |
| Perm<br>stand           | homes in the Hillside Overlay D<br>nit. This process requires a pub<br>dards, including the specific reg<br>ndment, Zone Change and Ten   | lic hearing and rulations for hillsic                     | eview of the project<br>de zoned parcels.                            | t to ensure complia<br>At this time, only th                        | nce with all code<br>e General Plan                             |  |  |

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Less Than Significant Impact

No Impact

no development project proposed and specific aesthetic impacts of any future development are too speculative to evaluate at this time. However, the future development of the parcels will be subject to a Hillside Development Permit and review by City staff to ensure there are no aesthetic impacts as a result of the development.

Any negative impacts caused by the proposed destruction of trees or other desirable aesthetic natural features would be reduced to a level of insignificance by conditions imposed during this review to preserve recognized aesthetic natural features. There are no trees proposed for removal under this application.

The site does not have structures that have been officially designated as historic resources, although the laboratory and garage have been identified as eligible for listing in the National Register of Historic Places for their association with Charles Richter and Beno Gutenberg and the development of the Richter scale, as well as the association with prominent architect Reginald Johnson. The proposed project would not impact nearby sites or structures which are historic resources. As noted above, any future development will require approval of a Hillside Development Permit and review by City staff including Design and Preservation staff, to ensure new homes on the site are compatible with the existing structures. The site is not part of a landmark district.

| c. Substantially degrad | e the existing visu | ıal character or qua | ality of the site an | d its surroundings? ( | ) |
|-------------------------|---------------------|----------------------|----------------------|-----------------------|---|
|                         |                     |                      | $\boxtimes$          |                       |   |

WHY? The project site is a narrow canyon that is heavily wooded along its western and eastern flanks. At the north end of the parcel, a large retaining wall and dense vegetation obscure views into the property. Overall, the geography, and dense tree and shrub growth obscure views into the center of the parcel from most vantage points along the public rights of way. No officially designated scenic vistas are associated with this parcel or its location within the San Rafael Hills. New development that may be built on the project site would be subject to the height and mass limitations of the Zoning Code and a Hillside Development Permit. The General Plan and Zoning Map Amendments would change the existing Institutional-Public/Semi-Public district to Low Density Residential-RS-2-HD (Single-family Residential, 2 du/acre/Hillside Overlay). This change would be consistent with the general plan and zoning designations for the surrounding properties.

The proposed parcel map as revised has the potential to impact 18 mature trees on Parcel B. The potential building pad for Parcel B is located at the southern end of the lot, north of San Rafael Avenue. Given the standards of the Hillside Development, Tree Protection and Grading Ordinances, this is the most likely location for the building pad that would require the least amount of grading and tree removal. However, several large trees are also at this location. Both the Tree Protection Ordinance and Hillside Development Permit process require landscape plans to be submitted and approved prior to the issuance of a building permit. The Tree Protection Ordinance requires that for each protected tree removed, there will have to be replacement tree plantings that will equal or exceed the existing canopy coverage and volume. Compliance with the statutory requirements of the Tree Protection Ordinance will result in less than significant impacts to the visual character and quality of the project site.

The RS-2-HD development standards regulate setbacks, lot coverage and building mass. The development standards for the Hillside Overlay District also have standards for siting and grading, as well as gross floor area and neighborhood compatibility. Furthermore, an applicant seeking to develop either of the newly subdivided parcels would be required to submit a landscape plan for review and approval by the Zoning Administrator prior to the issuance of any building permits. Approval of the proposed project would not lead to any demonstrable negative aesthetic impact.

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Less Than Significant Impact

No Impact

| d.   | Create a new source views in the are   |  | iht or glare which v  | vould adversely af   | fect day or nighttime   | ı     |  |
|--|--|--|---|--|---|-------|--|
|  |  |  |   |  | $\boxtimes$   |       |  |
| light and g<br>glare and<br>equipmer   | ny future development<br>glare because it will be<br>outdoor lighting. The<br>at must conform to Zo<br>a with streetlights in                      | pe required to con<br>e height and direct<br>oning Code requir | nply with the stand<br>ction of any outdoo<br>ements. The proje | ards in the zoning<br>r lighting and the s<br>ct is in an older, d | code that regulate screening of mechan eveloped residential         | nical |  |
| significan<br>Site Asse  | RICULTURAL RESO<br>t environmental effect<br>ssment Model (1997)<br>assessing impacts or   | ts, lead agencies<br>) prepared by the                         | may refer to the C<br>California Departn                        | alifornia Agricultur<br>nent of Conservati                         | al Land Evaluation a  |       |  |
| <b>a</b> .   |  | aps prepared pur   | suant to the Farml  | and Mapping and  | portance (Farmland)<br>Monitoring Program                           |       |  |
|  |  |  |   |  | $\boxtimes$   |       |  |
| western po<br>commercia<br>statewide<br>California   | ne City of Pasadena is a portion of the City containal recreation, park, natural importance, as shown of Resources Agency.  Conflict with existing | ins the Arroyo Seconral and open space on maps prepared p      | o, which runs from no. There is no prime sursuant to the Farmla | orth to south though<br>farmland, unique far<br>and Mapping and M  | the City. It has<br>mland, or farmland of<br>onitoring Program of t |       |  |
|  | -  |  | П   |  | $\boxtimes$   |       |  |
| 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 change<br>result in conversion   |  |   |  | lion of Halure, could   |       |  |
|  |  |  |   |  | $\boxtimes$   |       |  |
|  | nere is no known farn<br>nversion of farmland t  |  |   | fore the proposed  | project would not re  | sult  |  |
|  | <u></u>  |  |   | ····   |   |       |  |

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**Less Than** Significant Impact

No Impact

| <ol><li>AIR QUALITY. Where<br/>management or air pollution<br/>Would the project:</li></ol>  |  |   |  |  |
|--|--|---|--|--|
| a. Conflict with or obst   | ruct implementation  | of the applicable   | air quality plan? (  | )  |
|  |  |   |  |  |
| WHY? The proposed General lead to the development of two a university research center. This to set forth a comprehensive planning requirements. Specific update requirements and fulfill approved motor vehicle emissions. | single-family residence<br>ne purpose of the Air (<br>program that will lead<br>cally, the AQMP is de<br>the District's commitment | ces on what is curre<br>Quality Manageme<br>the area into comp<br>signed to satisfy the<br>nent to update trans | ently a 129,718 squarent Plan (AQMP) for bliance with all feder the California Clean A sportation emission | re foot lot developed with<br>the South Coast Air Basin<br>al and state air quality<br>Air Act (CCAA) tri-annual |
| The project must comply with a Management Plan (AQMP) and Association of Governments. Pasadena is also part of the We Air Quality Plan.  | opted by the South Coa<br>The AQMP contains m  | ast Air Quality Ma<br>leasures to meet fe   | nagement District an<br>deral and state requir   | d Southern California<br>rements. The City of  |
| b. Violate any air qu  | ality standard or con  | tribute to an exis  | ting or projected ai   | r quality violation? ( )   |
|  |  |   |  |  |
| WHY? Due to its geographic smog from other areas in the from wide areas of Los Ange San Gabriel Valley where it quality in Pasadena is high.   | e Los Angeles basin.<br>eles and adjacent citi   | . The prevailing lies, to the San F   | winds, from the soc<br>ernando Valley and  | uthwest, carry smog<br>I to Pasadena in the  |
| Pasadena is located in a no<br>standards. However, the pre<br>(SCAQMD) land use thresho<br>CEQA Air Quality Handbook   | oject itself does not r<br>old for significant air   | meet the South C  | Coast Air Quality Ma   | anagement District's   |
| According to the 1993 updated development of two single far workday. The construction is 1,309,000 square feet of gevelopment that could be a including existing development there would be no significant                 | amily residences, this<br>screening threshold<br>gross floor area or 16<br>accommodated from<br>ent. Potential new d               | s project will gen<br>of significance fo<br>66 single-family r<br>the proposed two                              | erate 19 average d<br>r potentially signific<br>esidential units. Th<br>o parcel subdivision               | aily trips (ADT) on a<br>cant air quality impacts<br>ne most potential<br>n is 16,772 square feet,               |
|  |  |   |  |  |

Significant **Potentially** Less Than Unless **Significant** Significant No Impact Mitigation is **Impact** Impact Incorporated 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)? ( П  $\boxtimes$ WHY? The City of Pasadena is within the South Coast Air Basin (SCAB). This basin is a non-attainment area for Nitrogen Dioxide (NO<sub>2</sub>) and fine particulates matter (PM<sub>10</sub>). Projects that contribute to a significant cumulative increase in NO<sub>2</sub> or PM<sub>10</sub> will be considered to be significant and require the consideration of mitigation measures. This project will not cause a cumulatively considerable increase in NO<sub>2</sub> and/or PM<sub>10</sub> during construction and/or operation. The project does not exceed the size and use limits in the SCAQMD's CEQA Air Quality Handbook for either construction or operation. d. Expose sensitive receptors to substantial pollutant concentrations?  $\boxtimes$ WHY? According to Figure 5-1 and Table 5-1 of the 1993 updated SCAQMD's CEQA Air Quality Handbook the project is located near sensitive receptors, however the General Plan and Zoning Map Amendment with the Tentative Parcel Map will not generate any significant toxic air emissions. The proposed general plan and zoning map amendments and the tentative parcel map application may result in the development of two single-family lots. Single-family residences are not classified as generators of pollutants and are compatible with the existing surrounding residential development. e. Create objectionable odors affecting a substantial number of people? (  $\boxtimes$ WHY? This type of use is not shown on the 1993 updated SCAQMD's CEQA Air Quality Handbook Figure 5-5 "Land Uses Associated with Odor Complaints." 6. **BIOLOGICAL RESOURCES.** Would the project: a. Have a substantial adverse effect, either directly or through habitat modifications, on any species

Service? ( )

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

 $\boxtimes$ 

Significant Unless Mitigation is Incorporated

Less Than Significant Impact

No Impact

WHY? The project is in a PS (Public-Semi-Public Zone District which is proposed for a change to RS-2 HD (Single-Residential/2 du/net acre). The project site is currently developed with two primary structures and ancillary sheds. The Annandale Country Club is situated to the south across San Rafael Avenue, while the surrounding adjacent areas are developed with single-family residences. A Biological Constraints Analysis for the project site was prepared by Pacific Southwest Biological Services, Inc., dated June 22, 2005. The analysis concluded that the long history of cultivation and development of the site precludes the presence of any sensitive species. No sensitive vegetation community occurs on the property. No sensitive plant or animal taxa occur on the site.

|        | <ul> <li>b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community<br/>identified in local or regional plans, policies, and regulations or by the California Department of<br/>Fish and Game or U.S. Fish and Wildlife Service? ( )</li> </ul> |                    |   |                       |                          |                      |  |
|--------|--|--------------------|---|-----------------------|--------------------------|----------------------|--|
|        |  |                    |   |                       |                          | $\boxtimes$          |  |
| WHY?   | ' Se   | ee response 6 a.   |   |                       |                          |                      |  |
| Arroyo | Se   | eco, the past dev  | natural communities. Al<br>relopment of the site lim<br>e no Wetlands or Jurisd | its drainage as       | pects to sheet flows a   |                      |  |
|        | c. Have a substantial adverse effect of federally protected wetlands as defined by Section 404 of<br>the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct<br>removal, filling, hydrological interruption, or other means? ( )         |                    |   |                       |                          |                      |  |
|        |  |                    |   |                       |                          | $\boxtimes$          |  |
| WHY?   | S  | ee Response 6 a    | a.  |                       |                          |                      |  |
| The p  | oje  | ct is located in a | developed urban area.   | There is no kn        | own naturally occurri    | ng wetland habitat.  |  |
|        | ,  | d. Interfere subs  | stantially with the mover   | nent of any nati      | ve resident or migrate   | ory fish or wildlife |  |
|        |  | species or w       | ith established native re   | sident or migra       | tory wildlife corridors, | or impede the use of |  |
|        |  | native wildlife    | e nursery sites? ( )  |                       |                          |                      |  |
|        |  |                    |   |                       |                          | $\boxtimes$          |  |
|        |  |                    | raints Analysis for the p<br>22, 2005 which found r                             |                       |                          |                      |  |
|        | е.   |                    | y local policies or ordina<br>olicy or ordinance?(                              | ances protecting<br>) | g biological resources   | s, such as a tree    |  |
|        |  |                    |   |                       |                          |                      |  |

|   | Significant<br>Impact | Unless<br>Mitigation is<br>Incorporated | Significant<br>Impact | No Impact |
|---|-----------------------|---|-----------------------|-----------|
| 1 |                       |   | $\boxtimes$           |           |

**Significant** 

WHY? The applicant has revised the parcel map to address community concerns presented at the neighborhood meeting of October 11, 2005, to limit access and egress to and from the redeveloped site to one point on San Rafael Avenue. The site contains 159 trees, of which 67 are considered significant by the Ordinance No. 6896 "City Trees and Tree Protection Ordinance" as detailed in the table below. The proposed revisions may potentially impact 18 trees, six of them protected. The original proposal potentially five affected trees all of which are considered protected based on their species size and location on the site.

Datastislik

| #  | Genus & Species          | Common Name        | Diameter         | Remain   | Move | Replace | Remove |
|----|--------------------------|--------------------|------------------|----------|------|---------|--------|
| 1  | Quercus agrifolia        | Coast Live Oak     | 10.2             | ✓        |      |         |        |
| 2  | Pittosporum undalatum    | Victorian Box      | 15.5, 16.5       | ✓        |      |         |        |
| 3  | Pittosporum undalatum    | Victorian Box      | 15.2             | 1        |      |         |        |
| 4  | Quercus agrifolia        | Coast Live Oak     | 27.7             | 1        |      |         |        |
| 5  | Platanus racemosa        | Calif. Sycamore    | 15.8             | 1        |      |         |        |
| 6  | Quercus agrifolia        | Coast Live Oak     | 12.5             | 1        |      |         |        |
| 7  | Platanus racemosa        | Calif. Sycamore    | 31.4             | ✓        |      |         |        |
| 8  | Quercus agrifolia        | Coast Live Oak     | 13.5             | 1        |      |         |        |
| #  | Genus & Species          | Common Name        | Diameter         | Remain   | Move | Replace | Remove |
| 9  | Quercus agrifolia        | Coast Live Oak     | 12.1             | ✓        |      |         |        |
| 10 | Quercus agrifolia        | Coast Live Oak     | 14               | 1        |      |         |        |
| 16 | Umbellularia californica | Calif. Laurel      | 13.7             | 1        |      |         |        |
| 17 | Platanus racemosa        | Calif. Sycamore    | 26.6             | ✓        |      |         |        |
| 19 | Olea europaea            | Olive Tree         | 4.7, 2.2, 2, 3.5 | ✓        |      |         |        |
| 32 | Umbellularia californica | Calif. Laurel      | 21.3             | 1        |      |         |        |
| 33 | Platanus racemosa        | Calif. Sycamore    | 9.9, 23.7        | ✓        |      |         |        |
| 35 | Quercus agrifolia        | Coast Live Oak     | 11.3, 13.7       | 1        |      |         |        |
| 40 | Pittosporum undalatum    | Victorian Box      | 6.5, 7           | ✓        |      |         |        |
| 41 | Pittosporum undalatum    | Victorian Box      | 6.1, 8.4, 10.3   | 1        |      |         |        |
| 42 | Platanus racemosa        | Calif. Sycamore    | 28.1             | 1        |      |         |        |
| 43 | Platanus racemosa        | Calif. Sycamore    | 25.7, 29.1       | 1        |      |         |        |
| 44 | Pinus canariensis        | Canary Island Pine | 28.3             | 1        |      |         |        |
| 61 | Pittosporum undalatum    | Victorian Box      | 7.2, 5.2, 3      | <b>✓</b> |      |         |        |
| 63 | Pittosporum undalatum    | Victorian Box      | 2, 3, 3.6, 4.5   | 1        |      |         |        |
| 73 | Quercus agrifolia        | Coast Live Oak     | 21.8             | <b>√</b> |      |         |        |
| 75 | Quercus agrifolia        | Coast Live Oak     | 18.5             | <b>✓</b> |      |         |        |
| 76 | Quercus agrifolia        | Coast Live Oak     | 32.7             | 1        |      |         |        |
| 77 | Pittosporum undalatum    | Victorian Box      | 6, 6.1, 7.3      | ✓        |      |         |        |

220 N. San Rafael Ave.

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| 78         | Pittosporum undalatum               | Victorian Box                   | ~14                 | <b>✓</b> |      |         |          |
|------------|-------------------------------------|---------------------------------|---------------------|----------|------|---------|----------|
| <br>B1     | Pittosporum undalatum               | Victorian Box                   | 7.3, 9.7, 11.9      | <b>✓</b> |      |         |          |
| 36         | Pinus halepensis                    | Aleppo Pine                     | ~22                 | 1        |      |         |          |
| 93         | Pittosporum undalatum               | Victorian Box                   | 3.9, 6.7, 8.9       | 1        |      |         |          |
| 95         | Heterimeles arbutifolia             | Toyon                           | 5.5, 6.4            | <b>✓</b> |      |         |          |
| 96         | Pinus canariensis                   | Canary Island Pine              | 26.8                | <b>✓</b> |      |         |          |
| 97         | Pittosporum undalatum               | Victorian Box                   | 25 @ base           | <b>✓</b> |      |         |          |
| 98         | Pittosporum undalatum               | Victorian Box                   | 6.2, 7.8            | <b>√</b> |      |         |          |
| 99         | Pittosporum undalatum               | Victorian Box                   | 16.3, 8, 10.1       | 1        |      |         |          |
| 100        | Pittosporum undalatum               | Victorian Box                   | 5.2, 4.6, 2         | <b>✓</b> |      |         |          |
| 101        | Pinus canariensis                   | Canary Island Pine              | 26                  | 1        |      |         |          |
| 115        | Pittosporum undalatum               | Victorian Box                   | 3, 3, 3.5, 3.8, 5   | <b>√</b> |      |         |          |
| 122        | Quercus agrifolia                   | Coast Live Oak                  | 9.1                 | +        |      |         | <b>√</b> |
| 125        | Heterimeles arbutifolia             | Toyon                           | 2, 2, 4.6, 4.1, 3.5 |          |      |         | 1        |
| 126        | Quercus berberidifolia              | Calif. Scrub Oak                | 8.5                 | 1        |      |         |          |
| #          | Genus & Species                     | Common Name                     | Diameter            | Remain   | Move | Replace | Remove   |
| 127        | Quercus agrifolia                   | Coast Live Oak                  | 17.4                | 1        |      | -       |          |
| 128        | Pittosporum undalatum               | Victorian Box                   | 3.8, 5.1, 3.8       | 1        |      |         |          |
| 129        | Pittosporum undalatum               | Victorian Box                   | 5, 5.3, 5.4         | 1        |      |         |          |
| 131        | Quercus agrifolia                   | Coast Live Oak                  | 12, 6.6             | <b>✓</b> |      |         |          |
| 132        | Quercus agrifolia                   | Coast Live Oak                  | 5, 5.8              | 1        |      |         |          |
| 133        | Heterimeles arbutifolia             | Toyon                           | 5, 5 @ 4            | <b>V</b> |      |         |          |
| 137        | Platanus racemosa                   | Calif. Sycamore                 | 34.7                | <b>✓</b> |      |         |          |
| 139        | Quercus agrifolia                   | Coast Live Oak                  | 17.5                |          |      |         | 1        |
| 140        | Pittosporum undalatum               | Victorian Box                   | 16.9                |          |      |         | <b>✓</b> |
| 141        | Quercus agrifolia                   | Coast Live Oak                  | 24                  |          |      |         | ✓        |
| 142        | Quercus agrifolia                   | Coast Live Oak                  | 9.6                 |          |      |         | ✓        |
| 143        | Pittosporum undalatum               | Victorian Box                   | 14                  |          |      |         | <b>✓</b> |
| 144        | Pittosporum undalatum               | Victorian Box                   | 18.7                |          |      |         | <b>✓</b> |
| 145        | Quercus agrifolia                   | Coast Live Oak                  | 26.2                |          |      |         | 1        |
| 146        | Umbellularia californica            | Calif. Laurel                   | 11.7                |          |      |         | <b>V</b> |
| 147        | Platanus racemosa                   | Calif. Sycamore                 | ~27                 |          |      |         | 1        |
|            | <u> </u>                            | 1                               | 13.6                |          |      |         | 1        |
| 148        | Quercus agrifolia                   | Coast Live Oak                  | 13.0                | 1        | İ    |         | 1        |
| 148<br>149 | Quercus agrifolia Platanus racemosa | Coast Live Oak  Calif. Sycamore | 26.7                |          |      |         | <b>✓</b> |
|            |                                     |                                 | <del></del>         | <b>✓</b> |      |         |          |

|     |                       | Impact          |                    | Impact Incorporated |  | imi | pact |  |
|-----|-----------------------|-----------------|--------------------|---------------------|--|-----|------|--|
| 152 | Quercus agrifolia     | Coast Live Oak  | 11.9               | <b>✓</b>            |  |     |      |  |
| 153 | Quercus agrifolia     | Coast Live Oak  | 13.3               | 1                   |  |     |      |  |
| 154 | Platanus racemosa     | Calif. Sycamore | 9, 14.9            | ✓                   |  |     |      |  |
| 155 | Pittosporum undalatum | Victorian Box   | 12.9, 7.2, 7.3     | ✓                   |  |     |      |  |
| 156 | Quercus agrifolia     | Coast Live Oak  | 7.4, 6.6, 6.3, 4.2 | ✓                   |  |     |      |  |
| 158 | Platanus racemosa     | Calif. Sycamore | 20.6               | <b>✓</b>            |  |     |      |  |

Potentially

Significant

**Significant** 

Unless

Mitigation is

**Less Than** 

Significant

No Impact

The tree analysis above provides information that will aid in assessing the potential impacts to existing protected trees from future residential development of the project site. The most likely redevelopment of Lot A, which contains the historic laboratory and garage and is the <u>larger</u> of the two, is adaptive reuse of these resources. Tree removal is not anticipated as there are large areas of <u>the lot</u> that are flat where development could occur without disturbing trees.

The proposed parcel map as revised has the potential to impact 18 mature trees on Parcel B, six of which are protected. The potential building pad for Parcel B will most likely be located at the southern end of the lot, north of San Rafael Avenue. Given the standards of the Hillside Development, Tree Protection and Grading Ordinances, this is the most likely location for the building pad that would require the least amount of grading and tree removal. However, several large mature trees are also located at this location. Both the Tree Protection Ordinance and Hillside Development Permit process require landscape plans to be submitted and approved prior to the issuance of a building permit. The Tree Protection Ordinance requires that for each protected tree removed, there will have to be replacement tree plantings that will equal or exceed the existing canopy coverage and volume. Compliance with the statutory requirements of the Tree Protection Ordinance will result in less than significant impacts to the visual character and quality of the project site. It is anticipated that development on Lot B may impact protected trees #'s 125, 141, 144, 145, 148, and 158. The future development of the parcels will be subject to a Hillside Development Permit and would require Tree Removal Permits for each of the protected trees. The HDP for a residence in the hillside is also subject to tree retention and removal plan requirements in addition to the Tree Protection Ordinance. Tree protection plans are also required which detail how all remaining trees will be protected throughout the construction process. Compliance with these established regulations would ensure that the proposed project would not lead to any significant tree impacts.

|  | provisions of an adop<br>Plan (NCCP), or other  |               | ·                  | ), Natural Community<br>bitat conservation plan? |  |  |  |
|--|---|---------------|--------------------|--|--|--|--|
|  |   |               |                    | $\boxtimes$                                      |  |  |  |
| WHY? There is no adopted Pasadena. There are also no |   |               | •                  | · · · · · · · · · · · · · · · · · · ·            |  |  |  |
| 7. CULTURAL RESOL                                    | JRCES. Would the p  | roject:       |                    |  |  |  |  |
|  | a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5? ( ) |               |                    |  |  |  |  |
|  |   |               | $\boxtimes$        |  |  |  |  |
| 220 N. San Rafael Ave.                               | PLN#2005-00213  | Initial Study | January 4, 2006 (R | evised) Page 30                                  |  |  |  |

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Less Than Significant Impact

No Impact

WHY? There are two buildings on the project site which are of historic significance. The first is the Charles Richter Laboratory and the ancillary garage structure. The lab and garage were constructed 1925-26 on the property owned and managed by Caltech. They were designed in the Mediterranean Revival Style by renowned local architect Reginald D. Johnson to emulate the appearance of a single-family residential development. The architecture is modest in its scale and styling. The property appears eligible for listing in the National Register of Historic Places for its association with the development of seismology and key individuals in the field (Charles Richter, Beno Gutenberg, etc.), its construction methods used for the lab building, and its design by Johnson. In addition, the property is eligible for local landmark designation.

Demolition, relocation, removal or significant alteration of these buildings is subject to review by the Historic Preservation Commission prior to issuance of a building permit by the City. The Historic Preservation Commission may deny or delay a demolition, relocation, or significant alteration for periods as long as 180-405 days.

The parcel depicted as Lot "A" measures approximately 104,108 square feet. The laboratory is approximately 6,746 square feet. The structure is large enough that adaptive reuse could be considered. There is sufficient opportunity to explore designing additional square footage adjacent to both the laboratory and garage. No specific design plans are attached to this application. Instead, during review of the Hillside Development Permits that are required for new residential development on the site(s), parcel specific development impacts to historic resources will be considered. In addition, any future development that involves changes to the historic structures on site will be subject to the City's Historic Preservation Ordinance, including review by the Historic Preservation Commission. Therefore, there will be a less than significant impact to historic resources.

| ·  |  |  |  |  |
|--|--|--|--|--|
| b. Cause a substa<br>Section 15064   |  | in the significand   | ce of an archaeologid  | cal resource pursuant to                                   |
|  |  |  |  | $\boxtimes$  |
| WHY? There are no know<br>are encountered during ground disturb these sites,<br>excavating the site shall be<br>Quality Act Guidelines.                                  | rading or construction of shall cease. An archa                              | of the project, all<br>leologist shall be                      | grading or construct notified and provisi                      | tion efforts, which ons for recording and                  |
| c. Directly or inc<br>feature? (   | lirectly destroy a uniqu<br>)  | e paleontologica   | al resource or site or   | unique geologic  |
|  |  |  |  | $\boxtimes$  |
| WHY? There are no record Therefore, there are no known the encountered during grading disturb these sites, shall be excavating the site shall be Quality Act Guidelines. | nown paleontological re<br>ng or construction of th<br>sease. An archaeologi | esources affecte<br>le project, all gra<br>st shall be notifie | d by the project. If a ding or construction and provisions for | ny such sites are<br>efforts, which would<br>recording and |
| d. Disturb any huma  | an remains, including t  | hose interred ou   | tside of formal cerer  | monies? ( )  |
|  |  |  |  | $\boxtimes$  |
| 220 N. San Rafael Ave.   | PLN#2005-00213   | Initial Study  | January 4, 2006 (R   | evised) Page 31  |

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Less Than Significant Impact

No Impact

WHY? The project site is a previously developed parcel in an urbanized area. There are no known human remains on the site. If any remains are encountered during project implementation the Los Angeles County Coroner will be contacted.

| 8.                   | EN   | IERG | <b>Υ</b> . \ | Voul  | d the p | oropo  | sal:   |           |         |       |         |        |             |      |   |             |                          |  |
|----------------------|--|------|--------------|-------|---------|--------|--------|-----------|---------|-------|---------|--------|-------------|------|---|-------------|--------------------------|--|
|                      | a. Conflict with adopted energy conservation plans? ( )  |      |              |       |         |        |        |           |         |       |         |        |             |      |   |             |                          |  |
|                      |  |      |              |       |         |        |        |           |         |       |         |        |             |      |   | $\boxtimes$ |                          |  |
| property these and I | 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. Furthermore, 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  | ). U | se n         | on-re | newal   | ble re | source | es in a v | vastefu | l and | ineffic | ient m | annei       | r? ( | ) |             |                          |  |
|                      |  |      |              |       |         |        |        |           |         |       |         |        | $\boxtimes$ |      |   |             |                          |  |
|                      |  |      | •            |       |         |        |        |           | _       | _     |         |        | _           | •    | • |             | opment of<br>ption of oi |  |

based energy products. However, the additional amount of resources used will not cause a significant reduction in available supplies.

The long-term impact from increased energy use by this project (including future development resulting from 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 does not include any development of the site, therefore will be no impacts related to energy consumption.

However, future development resulting from this project will most likely generate two single-family residences. This development will result in the increased consumption of 252 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. Installation of energy-saving features will be inspected by a City Inspector prior to issuance of a Certificate of Occupancy.

Future development will also result in an increase of approximately 660 gallons per day in water consumption. The current use consumes approximately 412 gallons of water per day. The net gain in water consumption would be 248 gallons of water per day. However, this impact will be mitigated during drought periods by the applicant adhering to the Water Shortage Procedures Ordinance, which restricts

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Less Than Significant Impact

No Impact

water consumption to 90% of expected consumption during each billing period. Installation of plumbing will be inspected by a Building Division Code Enforcement Inspector prior to issuance of a Certificate of Occupancy.

| Occupa  |                                       | ·•   |   |  |  |   |  |
|---|---------------------------------------|--|---|--|--|---|--|
| 9. G  | ΕO                                    | LOGY AND SOILS. V  | Vould the project   | t:   |  |   |  |
|   | Е                                     | xpose people or struct<br>injury, or death invol   |   | l substanti  | al adverse effe  | cts, including the  | risk of loss,  |
|   | a.                                    | Rupture of a known ea<br>Fault Zoning Map issu<br>evidence of a known f  | ed by the State   | Geologist  | for the area or  | based on other s  | ubstantial .   |
|   |                                       |  |   |  |  | $\boxtimes$   |  |
| Andrea  | s F                                   | cording to the 2002 ad<br>ault is a "master" active<br>proximately 21 miles n  | e fault and contro  | ols seismi   |  |   |  |
| Zones.  | Pa<br>d fo                            | y of Los Angeles and t<br>sadena is in four USG<br>r earthquake fault zone<br>adrangles have not yet   | S Quadrants, thes under the Alq   | e Los Ang<br>uist-Priolo   | eles, and the No. Act in 1977.   | Иt. Wilson quadra<br>Гhe Pasadena and   | nts were   |
| primaril<br>the Ger<br>Raymo<br>Eagle F<br>Sierra M | ly nera<br>nera<br>nd l<br>Roc<br>Mad | o and partially in the Ci<br>orth of the City and the<br>al Plan considers the S<br>Fault to be in an Alquis<br>k Fault is considered p<br>dre Fault, 1.8 miles sou<br>e Raymond Fault and ( | e Raymond Fault<br>lierra Madre Fau<br>st-Priolo Earthqu<br>lotentially active<br>athwest of a pote | t primarily<br>alt to be in<br>ake Fault<br>. The propentially act | south of the Ci<br>a Fault Hazard<br>Zone. Within to<br>posed project sive strand of the | ity. The 2002 Safe<br>I Management Zo<br>he south west of t<br>ite is 4.5 miles so<br>e Sierra Madre Fa | ety Element of<br>ne and the<br>he City, the<br>uthwest of the |
| Californ<br>damage<br>other a                       | nia.<br>e is<br>ppli                  | tial exists for people ar<br>This project will not in<br>minimized because th<br>cable codes, and is su<br>esigned to meet or exc  | crease the poter<br>e new structure<br>bject to inspection  | ntial occur<br>shall be b<br>on during                             | rence of earthouseling to construction.  | quakes. The risk of the Uniform Buil Structures for hum   | of earthquake<br>ding Code and<br>an habitation                |
|   | b.                                    | Strong seismic ground  | d shaking? (  | )  |  |   |  |
|   |                                       |  |   |  |  | M   |  |

WHY? City of Pasadena is within a larger area traversed by active fault systems, such as the San Andreas and Newport-Inglewood. Any major earthquake along these systems will cause seismic ground shaking in Pasadena. At a minimum the earthquake-resistant design and materials of new projects must meet or exceed the current seismic engineering standards of the California Uniform Building Code Seismic Zone 4 requirements. 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.

|   |  | Potentially<br>Significant<br>Impact   | Significant<br>Unless<br>Mitigation is<br>Incorporated   | Less Than<br>Significant<br>Impact   | No Impact  |
|---|--|--|--|--|--|
| С.  | Seismic-related ground fa<br>Hazards Zones Map issue<br>evidence of known areas  | ed by the State Ge   |  |  |  |
|   | 1  |  |  | $\boxtimes$  |  |
| Seismic H<br>of the Ger<br>liquefactio<br>San Rafae<br>indicate po<br>location is | cording to Plate P-1 of the e<br>azard Zone Maps) or Plate<br>nera Plan, the project site is<br>in. This area is the flat area<br>el Avenue. This area is not<br>otential residential developr<br>a knoll adjacent to the road<br>w to ensure no potential imp | 1-3 of the Technic<br>in an area subject<br>a at the southern e<br>anticipated for de<br>ment may occur in<br>dway. Any future o | cal background Re<br>t to liquefaction wi<br>and of the property<br>velopment, rather<br>the northwest con | port to the Cities S<br>th a historic occurre,<br>at the driveway er<br>preliminary develor<br>ner of the existing | Safety Element<br>ence of<br>ntrance from<br>pment plans<br>parcel; the  |
| Code regu   | s in a hillside area, and has<br>ulations will control any slop<br>is there will be no increased   | e instability; there   | fore there will be n   | o impact. Due to t   | these codes and  |
| d.  | Landslides as delineated of the Geologist for the area or the (  |  |  |  |  |
|   |  |  |  |  | $\boxtimes$  |
| Seismic H<br>Instability<br>General P<br>any known<br>regulation                  | cording to Plate P-1 of the lazard Zone Maps), the pro<br>Map (Plate 2-4 of the Tech<br>Plan) the project is not in an historic evidence of lands is will control any slope instead ap does not show this project.   | ject site is not in a<br>nical Background<br>area of slope insta<br>lides on the project<br>ability; therefore th                | Landside Hazard<br>Report of the adopability. According<br>at site or adjacent phere will be no imp        | Zone. According to<br>ted 2002 Safety E<br>to these same sour<br>properties. Existing<br>act. In addition the      | o the Slope<br>lement of the<br>rces there is not<br>g City<br>e Seismic |
| e. I  | Result in substantial soil ero   | osion or the loss of   | f topsoil? ( )   |  |  |
|   |  |  |  | $\boxtimes$  |  |
| Appendix<br>Developm  | e displacement of soil throu<br>Chapter 33 of the 2001 Ca<br>ent Overlay District regulat<br>s; therefore there will be a  | lifornia Building Co<br>ions, other applica  | ode relating to gradable building regula   | ding and excavatio   | n, the Hillside  |
| The applic  | cant must have an approve  | d site to receive ar   | ny exported cut ea   | rth.   |  |
| According   | to the Final Environmental   | l Impact Report ce   | rtified for the adop   | tion of the 1994 La  | and Use and  |

Mobility Elements, 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

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Less Than Significant Impact

No Impact

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.

Construction may temporarily expose the soil to wind and/or water erosion. This erosion will be controlled by proper grading techniques as specified in the grading ordinance, a grading plan submitted to the Building Official and Public Works Department for review and approval prior to the issuance of a building permit and by city inspections and condition monitoring after the issuance of a building permit.

| by city ins                                       | pections and condition   | n monitoring aft   | er the issuance of   | a building permit.   | <b>3</b> .   |  |  |  |  |
|---|--|--|--|--|--|--|--|--|--|
| f.  | f. 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? ( ) |  |  |  |  |  |  |  |  |
|   |  |  |  |  | $\boxtimes$  |  |  |  |  |
| are relative Fault on the with the new Mountains  | ne north and the Sierra<br>orth south compressions. This uplifting combined<br>that the soil is stable   | time. These mo<br>a Madre Fault to<br>on of the San Ar<br>ned with erosio  | ountains run genera<br>o the south. The a<br>ndreas tectonic plat<br>n has helped form | ally east-west and ction of these two to the is pushing up the the alluvial plain.       | have the San Andreas<br>faults in conjunction<br>e San Gabriel             |  |  |  |  |
| the north pentail the Zone District for the built | property boundary of t<br>adaptive reuse of the  | he subject parc<br>existing laborat<br>ot permitted). I<br>ea at the south | el. The proposed ory and garage (un<br>For Lot B, the propo<br>ern end of this pard    | residential develop<br>nder the provisions<br>osed building pad t<br>cel adjacent to the | of the Hillside Overlay<br>the most likely location<br>ornamental entrance |  |  |  |  |
|   | Be located on expansi<br>creating substantial ris  |  |  | of the Uniform Bu  | uilding Code (1994),   |  |  |  |  |
|   |  |  |  |  |  |  |  |  |  |
| underlain   | ccording to the 2002 a<br>by alluvial material fro<br>d is in the low to mode  | m the San Gab  | riel Mountains. Th   | is soil consists prin  |  |  |  |  |  |
|   | Have soils incapable o<br>disposal systems whei  |  |  |  |  |  |  |  |  |
|   |  |  |  |  | $\boxtimes$  |  |  |  |  |
| regulation  | e City of Pasadena all<br>s found in Ordinances<br>not in any of these spe   | 3881 and 417   | 0 and codified in Pa   | asadena Municipal  | Code. The proposed   |  |  |  |  |