

**ATTACHMENT 8 - INITIAL STUDY, MITIGATED
NEGATIVE DECLARATION, AND NOTICE OF
DETERMINATION**

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

**REVISED 8/23/06
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: Monte Vista Grove Homes
2. Lead Agency Name and Address: City of Pasadena
175 N. Garfield
Pasadena, CA 91109
3. Contact Person and Phone Number: Carol Hunt Hernandez, 626-744-6768
4. Project Location: 2889 San Pasqual Street
Pasadena, CA 90014
5. Project Sponsor's Name and Address: Steinberg Architects
523 West 6th Street, Suite 243
Los Angeles, CA 90014
6. General Plan Designation: Institutional
7. Zoning: PS (Public and Semi-Public Space)
8. Description of the Project:

The proposed project is a Master Development Plan for the Monte Vista Grove Homes. Monte Vista Grove Homes is a retirement community for Presbyterian ministers, their spouses and other individuals associated with church activities. The site is located on San Pasqual Street between San Gabriel Boulevard and El Nido Street and comprises over 13.7 acres. The site currently has 92 independent living units, 16 assisted living units, and 40 nurse-attended resident patient beds. The new residential mix of the complex would include 141 independent living units, 16 assisted living units and 40 skilled nursing beds. The project includes demolition of five single-story multi-family buildings totaling 14 units; conversion of one residential unit in Building AE to a wellness facility, and reconvert a unit in AG from an office to a residential unit, and the demolition of one single story common area building; Addition of approximately 7,200 square feet of administrative offices, dining, an activity space to the existing 37,206 square feet of non-residential square feet; Addition of five new single story units to existing buildings; and adding four new two-story multi-family buildings for a net gain of 49 units. The project will increase

its parking supply from 142 to 216 spaces for a net increase of 74 parking spaces. The project will be phased over 20 years and the first phase will begin in mid year 2008:

MONTE VISTA GROVE PHASING SCHEDULE

PHASE I				
April 2007				
	Existing	New	Difference	Demolition
Building	s.f.	s.f.	s.f.	s.f.
AQ	4,075	16,400	12,325	4,075
AE	2,208	2,208	0	None
N	481	3,900	3,419	481
M	15,716	19,000	3,284	None
O	2,628	2,628	0	None
Sub-total	25,108	44,136	19,028	4,556

PHASE II				
April 2011				
	Existing	New	Difference	Demolition
Building	s.f.	s.f.	s.f.	s.f.
AR	4,558	24,000	19,442	4,558
AS	0	2,500	2,500	None
Sub-total	4,558	26,500	21,942	4,558

PHASE III				
April 2015				
	Existing	New	Difference	Demolition
Building	s.f.	s.f.	s.f.	s.f.
AO	4,130	24,000	19,870	4,130
Sub-total	4,130	24,000	19,870	4,130

PHASE IV				
April 2019				
	Existing	New	Difference	Demolition
Building	s.f.	s.f.	s.f.	s.f.
AM	3,082	16,800	13,718	3,082
Sub-total	3,082	16,800	13,718	3,082

PHASE V				
April 2023				
	Existing	New	Difference	Demolition
Building	s.f.	s.f.	s.f.	s.f.
H	2,797	4,300	1,503	
I	3,080	4,500	1,420	
Y	2,851	4,300	1,449	
Sub-total	8,728	13,100	4,372	

TOTAL SQUARE FOOTAGE

	Existing	New	Difference	Demolition
Phase I	25,108	44,126	19,208	4,556
Phase II	4,558	26,500	21,942	4,558
Phase III	4,130	24,000	19,870	4,130
Phase IV	3,082	16,800	13,718	3,082
Phase V	8,728	13,100	4,372	0
Total	45,606	124,526	79,110	16,326

9. Surrounding Land Uses and Setting: To the north of the site is Las Encinas Hospital, a 22 acre medical facility; south, east and west are single family residences.
10. Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement): The City Council will be required to approve the Master Development Plan. The Planning Commission reviews and makes recommendations to the City Council on the MDP. The Design Commission reviews and makes recommendation on the proposed Master Plan.

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		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.	

Carol Ann Hernandez 8/31/06
Prepared By/Date

Jennifer Paig Saeki 8/31/06
Reviewed By/Date

Carol Ann Hernandez
Printed Name

Jennifer Paig Saeki
Printed Name

Negative Declaration/Mitigated Negative Declaration adopted on: _____

Adoption attested to by: _____
Printed name/Signature Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

- c) Mitigation Measures. For effects that are "less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier documents and the extent to which address site-specific conditions for the project.
 - 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
 - 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
 - 8) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significant
-

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

SECTION II - ENVIRONMENTAL CHECKLIST FORM

1. BACKGROUND.

Date checklist submitted: February 16, 2006
 Department requiring checklist: Planning and Development - Community Planning
 Case Manager: Carol Hunt Hernandez

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

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

3. AESTHETICS. Would the project:

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

WHY? The project site is not in an area that offers views of the San Gabriel Mountains, the Arroyo Seco, the San Rafael Hills, Eaton Canyon, or Old Town Pasadena. Furthermore, the project would not in any way obstruct the views of any of these scenic resources. Therefore, the project would have no impact to scenic vistas.

In accordance with section 17.61.050 of the City's Zoning Code, the Design Commission shall review and makes a recommendation to the Planning Commission on each Master Development Plan. 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 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?* ()

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

WHY? The proposed project consists of demolition of five single-story multi-family buildings totaling 14 units; demolition of one single story common area building; addition of approximately 7,200 s.f. of administrative offices, dining, and activity space; additions of five new single-story units to existing buildings; and addition four new two-story multi-family building for a net gain of 50 units. 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 Administrator (*and/or Design Review Commission or staff*) prior to the issuance of any building permits. Approval of the proposed project would not lead to any demonstrable negative aesthetic impact.

As required by section 17.61.030 of the Pasadena Municipal Code, the design of this project will be reviewed by the Director. None of the individual buildings exceed 25,000 square feet. 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 only outdoor lighting included in the project are pedestrian safety lighting, landscaping lights, and a maximum of eight (8) new streetlights on or near the frontage of the property on San Pasqual Street and a maximum of five (5) street lights on or near the frontage of the property on El Nido Avenue as required by the Public Works Department. The project is in an older, developed residential urban 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.

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 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

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

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 growing areas. Commercial Growing Area/Grounds is permitted in the CG (General Commercial), CL (Limited Commercial), and IG (General Industrial) zones and conditionally in the RS (Residential Single-Family), and RM (Residential Multi-Family) districts. The use is also permitted within certain specific plan areas. The zoning for this site is PS (Public and Semi-Public Space). The development of the site began around 1924.

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 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

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

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. The SCAQMD has developed significance thresholds that correspond to the air quality standards for the SCAB. These thresholds are described in Chapter 6 of the SCAQMD CEQA Handbook (1993) and shown in Table 5.1 of this report.

The proposed project would generate short-term air pollutants from construction activities and long-term air pollutants from typical vehicle trips and household practices (i.e., natural gas combustion). The proposed project's potential air emissions were calculated using the "URBEMIS 2002 Air Emissions from Land Development" model (URBEMIS model). The project is phased over a 20 year period (five phases); therefore a model was run for each of the phases. Table 5.1 presents the estimated air quality emission of the proposed project as calculated by the URBEMIS model for each of those five phases.

Table 5.1 Project Air Emissions/AQMD Threshold Comparison Matrix

Phase 1 -- April 2007

	Area Plus Operational Emission Threshold (max. lbs/day)	Project's Area and Operational Emissions (max. lbs/day)	Daily Construction Emission Threshold (max. lbs/day)	Project's Construction Emissions (max. lbs/day)
ROG*	55	6.60	75	32.95
NOx	55	7.06	100	33.44
CO	550	75.77	550	37.12
SO ₂	150	0.05	150	0.01
PM10	150	6.77	150	3.50

Phase 2 - April 2011

	Area Plus Operational Emission	Project's Area and Operational Emissions (max.	Daily Construction Emission	Project's Construction Emissions (max. lbs/day)

Potentially
Significant
Impact

Significant
Unless
Mitigation is
Incorporated

Less Than
Significant
Impact

No Impact

	Threshold (max. lbs/day)	lbs/day	Threshold (max. lbs/day)	
ROG*	55	0.97	75	17.53
NOx	55	0.53	100	29.27
CO	550	5.04	550	39.52
SO ₂	150	0.01	150	0.03
PM10	150	0.45	150	6.01

Phase 3 – April 2015

	Area Plus Operational Emission Threshold (max. lbs/day)	Project's Area and Operational Emissions (max. lbs/day)	Daily Construction Emission Threshold (max. lbs/day)	Project's Construction Emissions (max. lbs/day)
ROG*	55	1.19	75	17.52
NOx	55	0.38	100	29.25
CO	550	3.52	550	39.15
SO ₂	150	0.01	150	0.03
PM10	150	0.45	150	5.47

Phase 4 – April 2019

	Area Plus Operational Emission Threshold (max. lbs/day)	Project's Area and Operational Emissions (max. lbs/day)	Daily Construction Emission Threshold (max. lbs/day)	Project's Construction Emissions (max. lbs/day)
ROG*	55	0.89	75	2.71
NOx	55	0.20	100	22.09
CO	550	1.75	550	20.01
SO ₂	150	0.00	150	0.05
PM10	150	0.19	150	13.61

Phase 5 – April 2023

	Area Plus Operational Emission Threshold (max. lbs/day)	Project's Area and Operational Emissions (max. lbs/day)	Daily Construction Emission Threshold (max. lbs/day)	Project's Construction Emissions (max. lbs/day)
ROG*	55	0.35	75	8.75
NOx	55	0.09	100	10.24
CO	550	1.19	550	15.11
SO ₂	150	0.00	150	0.00
PM10	150	0.11	150	0.45

*ROG (Reactive Organic Gas) through a series of chemical reactions with NOx forms ground level ozone.

As shown in Table 5.1, each phase of the proposed project would not exceed the Thresholds of Significance established by the SCAQMD. Therefore, the proposed project would not cause a violation of an air quality standard or substantially contribute to an existing violation, and would have no significant related impacts.

It should also be noted that the URBEMIS does not account for SCAQMD Rule 403, which applies to the proposed project. This rule requires construction practices within the SCAB to take measures to reduce emission of fugitive dust, including PM₁₀. SCAQMB Rule 403 Part D (as amended April 2, 2004) states in relevant part:

- (1) No person shall cause or allow the emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area such that:
 - (A) the dust remains visible in the atmosphere beyond the property line of the emission source; or

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

(B) the dust emission exceeds 20 percent opacity (as determined by the appropriate test method included in the Rule 403 Implementation Handbook), if the dust emission is the result of movement of a motorized vehicle.

(2) No person shall conduct active operations without utilizing the applicable best available control measures included in Table 1 of this Rule to minimize fugitive dust emissions from each fugitive dust source type which is part of the active operation.

(3) No person shall cause or allow PM₁₀ levels to exceed 50 micrograms per cubic meter when determined, by simultaneous sampling, as the difference between upwind and downwind samples collected on high-volume particulate matter samplers or other U.S. EPA-approved equivalent method for PM₁₀ monitoring. If sampling is conducted, samplers shall be:

(A) Operated, maintained, and calibrated in accordance with 40 Code of Federal Regulations (CFR), Part 50, Appendix J, or appropriate U.S. EPA-published documents for U.S. EPA-approved equivalent method(s) for PM₁₀.

(B) Reasonably placed upwind and downwind of key activity areas and as close to the property line as feasible, such that other sources of fugitive dust between the sampler and the property line are minimized.

(4) No person shall allow track-out to extend 25 feet or more in cumulative length from the point of origin from an active operation. Notwithstanding the preceding, all track-out from an active operation shall be removed at the conclusion of each workday or evening shift.

(5) After January 1, 2005, no person shall conduct an active operation with a disturbed surface area of five or more acres, or with a daily import or export of 100 cubic yards or more of bulk material without utilizing at least one of the measures listed in subparagraphs (d)(5)(A) through (d)(5)(E) at each vehicle egress from the site to a paved public road.

(A) Install a pad consisting of washed gravel (minimum-size: one inch) maintained in a clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long.

(B) Pave the surface extending at least 100 feet and at least 20 feet wide.

(C) Utilize a wheel shaker/wheel spreading device consisting of raised dividers (rails, pipe, or grates) at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.

(D) Install and utilize a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.

(E) Any other control measures approved by the Executive Officer and the U.S. EPA as equivalent to the actions specified in subparagraphs (d)(5)(A) through (d)(5)(D).

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)? ()*

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

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

As shown in 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, adding 50 net new residential units and 7200 sq. feet of administrative functions to an existing campus for retired Presbyterian ministers, missionaries and other Christian associates, is not likely to generate any significant toxic air emissions. In addition to the residential units, the campus includes a 40 bed nursing facility and 16 assisted living apartment units. The proposed project is the demolition of several existing buildings, additions to existing buildings and construction of new residential units. The project is phased over a 20 year period, so air quality impacts will also be phased, and impacts to residents will also be reduced. 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. The site is located in a residential neighborhood with a hospital located to the north and not located near any of the following land uses: freeways and high traffic roads, distribution centers, rail yards, ports, refineries, chrome platers, dry cleaners using perchloroethylene and gasoline dispensing facilities.

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:

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? ()

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

WHY? The project is in a developed urban area. There are no known unique, rare or endangered plants 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. 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 onsite 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.

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

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

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

Potentially Significant Impact

Significant Unless Mitigation is Incorporated

Less Than Significant Impact

No Impact

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 422 trees of which 62 are protected by the Ordinance No. 6896 "City Trees and Tree Protection Ordinance". Out of those 62 trees only one protected tree is proposed to be relocated. The tree needs to be removed because of location adjacent to Building AR which is in Phase II. A total of 52 non-protected trees will be removed and none are planned to be relocated.

#	Genus & Species	Common Name	Diameter	Remain	Move	Replace	Remove
326	Lagerstroemia indica	Crape Myrtle	13.6		X		

Because the development of the project is phased over 20 years, and trees will be removed and added as development occurs, the applicant will adhere to the tree ordinance that is in place at the time of each phase. Monitoring for three (3) years after completion of the project is appropriate to maximize survival of all on-site trees. Compliance with the City's existing ordinance will ensure that the proposed Master Development Plan would not significantly impact locally designated species

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 is 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? ()

WHY: The campus of the Monte Vista Grove homes is documented in earlier surveys, the 1990 master development plan, and a California Register of Historic Resources Evaluation (Archistoria, May 2004) as a historic resource. These sources attribute historic significance to the property its associations with the architect Myron Hunt (and Hunt working in collaboration with H.C. Chambers) and with the landscape architects, Lucille Council and Florence Yoch. These evaluations, however, do not adequately consider three factors:

- a) the **small area of the existing campus that was built in accordance with the original plan designed by Myron Hunt** (only 9 of the existing 53 buildings are on sites identified in Hunt's 1923 plan and the street network, the alignment of buildings, and the placement of the open space have only a fragmentary relationship to the original plan);
- b) the **erosion of historic integrity to some of the bungalows** caused by alterations and additions; and
- c) the **effect of adjacent newer construction** at a larger scale; this construction isolates the bungalows designed by Hunt & Chambers to two small areas of the campus.

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

The accumulative effect of the deviations from the original plan, the alterations to the existing bungalows, and the scale and siting of new construction minimize the portion of the campus that constitutes a historic resource. This area is primarily a grouping of eight bungalows at the western edge of the property and a separate grouping of three bungalows center at the south-east corner of C Street and Second Street.

The master development plan includes demolition of one building designed by Hunt, a one-story, six-unit complex, Building A38-A43, constructed in 1937. Described in the 2004 technical report by Archistoria as a "flat-roofed bungalow with English [Regency] elements," Building A38-A43 is at the north edge of the campus flanked by two similar buildings, (A33-A37; C70-C73). These two buildings, constructed in 1949 and 1950, are also proposed for demolition. Although related stylistically to the earlier works on the campus by Hunt & Chambers, they are prosaic examples of Spanish Eclectic design and ineligible for a historic designation.

Building A38-A43 has plastered exterior walls, wood-framed windows, and four Adam-style porches with flared (faux Mansard) standing-seam metal roofs supported by lacey, curvilinear wrought-iron posts. Rectangular in plan, it occupies the approximate location of a primary building (the infirmary) illustrated in the original 1923 plan for the campus, though it is smaller in footprint and does not have the two wings and axial orientation of the original concept. It has minor alterations mostly to window openings on both the north and south elevations.

Building A38-A43 (and the two-story Monterey Revival bungalow A24-A28) is unrelated in plan or in building type to the two groupings of original bungalows on the campus. Demolition of this building, therefore, is a less-than-significant impact because it does not affect a grouping of historic structures that could constitute a small district. With demolition of the building, the district (i.e., the two groupings of bungalows designed by Hunt and/or Hunt & Chambers) would retain its integrity.

The demolition of Building A38-A43 will not affect any significant landscaping or landscaping attributed to Yoch and Council. The 1990 master plan included a condition of approval encouraging Monte Vista Grove Homes to identify and restore areas with landscape designs by Yoch and Council.

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 as a home for retired Presbyterian Minister, associates and their families since the early 1920's and has been entirely developed with associated structures and facilities. If archaeological resources once existed on-site, it is likely that previous grading, construction, and modern use of the site have either removed or destroyed them. Consequently, surficial soils on the project site are devoid of archaeological resources.

Development of the proposed project would involve minor grading to establish building pads and develop onsite infrastructure. However, the proposed grading would not encroach into undisturbed soils. Therefore, the proposed project would have no impacts to archaeological resources. There are no buildings and/or structures, natural features, works of art or similar objects scheduled for demolition relocation, removal or significant alteration on the project site, which are of significant archaeological value to the City.

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

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

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

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

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? ()

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

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? ()

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

Why? 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.

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 733 net kilowatt-hours of electrical energy per day. This increased consumption will be reduced to an insignificant level by meeting the above referenced

Potentially Significant Impact

Significant Unless Mitigation is Incorporated

Less Than Significant Impact

No Impact

The project site is not within any of these potential fault rupture zones. The closest mapped fault zone, the Raymond Hill Fault Zone, is 1/2 mile north from 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? See 9.a.i. Since the City of Pasadena is within a larger area traversed by active fault systems, such as the San Andreas and Newport-Inglewood Faults, any major earthquake along these systems will cause seismic ground shaking in Pasadena. Much of the City is on sandy, stony or gravelly loam formed on the alluvial fan adjacent to the San Gabriel Mountains. This soil is more porous and loosely compacted than bedrock, and thus subject to greater impacts from seismic ground shaking than bedrock.

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

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

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

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

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

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

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

WHY? Construction of the project will lead to 4,000 cubic yards of fill and 6,000 cubic yards of cut with a total of 2,000 cubic yards being exported. The project will cover approximately 34% of the site as compared to the present use, which occupies 25% of the site. The existing building regulations and property site inspections ensure that construction activities do not create unstable earth conditions.

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

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

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

Construction may temporarily expose the soil to wind and/or water erosion. Erosion caused by strong wind, excavation and earth moving operations will be minimized in accordance with SCAG Rule 403 by watering during construction and by covering earth to be transported in trucks to or from the site.

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

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

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

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

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

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?* ()

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

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?* ()

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

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?* ()

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

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?* ()

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

WHY? The project does not involve hazardous emissions or the handling of hazardous materials, substance, or waste and is not within one-quarter mile of an existing or proposed school. Therefore, the proposed project would have no hazardous material related impacts to schools.

- 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?* ()

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? 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 been used as a retirement community since 1924, 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? ()

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

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? ()

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

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? ()

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

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.

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

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 Pollutant 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 7200 square feet of non-residential uses and 50 new units. None of the proposed uses are 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. In addition, since the proposed development meets the City's SUSMP requirement thresholds, the applicant is required to submit and implement a SUSMP compliance plan. Compliance with the MS4 permit and SUSMP would ensure

Potentially Significant Impact

Significant Unless Mitigation is Incorporated

Less Than Significant Impact

No Impact

that 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 13,720 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.

As part of the Memorandum of Understanding (MOU) signed between the City of Pasadena and the State Water Conservation Coalition in 1991, the City through its Department of Water and Power has agreed to implement certain water conservation measures known as "Best Management Practices" (BMP) among these are the draft "Landscape Water Management Ordinance", its' threshold is any new or rehabilitated landscaping areas greater than 2,500 sq. ft. requiring a building permit.

- 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 virtually 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