

ATTACHMENT 3

Initial Study (Parcel B)

**CITY OF PASADENA
175 NORTH GARFIELD AVENUE
PASADENA, CA 91101-1704**

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: Art Center College of Design—
South Campus (Parcel B) Parking Structure

2. Lead Agency Name and Address: City of Pasadena
Planning & Development Department
Development Division
100 N. Garfield Avenue, S116
Pasadena, CA 91109

3. Contact Person and Phone Number: Erin Clark
626-744-6708

4. Project Location: The proposed project is in the City of Pasadena, County of Los Angeles. The project site is located on the south side of Glenarm Street at the southern terminus of Raymond Avenue. There is no address currently assigned to this parcel, but the legal description lists it as "Parcel B: Glenarm Power Plant Site". The address of the adjacent building to the west is 72 E. Glenarm Street.

5. Project Sponsor's Name and Address: Art Center College of Design
1700 Lida Street
Pasadena, CA 91103
Contact Person: Patricia Oliver

6. General Plan Designation: South Fair Oaks Specific Plan

7. Zoning: IG-SP2-HL56 (Industrial, South Fair Oaks Specific Plan, Height Overlay of 56 feet)

8. Description of the Project:

Statement of Purpose

The City of Pasadena is considering entering into a Development and Lease Agreement with Art Center College of Design (Art Center) to facilitate Art Center’s use of Parcel B on the Glenarm Power Plant Site to develop a parking structure. The intended use is to provide parking for existing South Campus facilities and for students who will reside in newly constructed housing directly across Glenarm Street at the Art Center South Campus site. The student housing component was previously approved as part of a Master Development Plan within the South Fair Oaks Specific Plan area.

General Site Description

The site contains approximately 0.70 ± acres (30,640 sq. ft. ±) of gross area and is situated as shown in Figure 1. The parcel is generally located on the south side of Glenarm Street at the southern terminus of S. Raymond Ave. The MTA Gold Line right-of-way forms the eastern boundary of the parcel. Pasadena Water & Power Department property bounds the parcel to the south.

The Property is currently improved with three, above-ground fuel oil storage tanks. Two of the three tanks (each 42ft. 3in. tall) were fully emptied in the mid-1990s. The remaining tank (48ft. tall) was emptied in 2002 but still contains approximately one foot (500 barrels) of residual material that has yet to be removed. The tanks were used as part of the Glenarm Power Plant site, which is currently not in operation. The site is vacant.

Development Description

The Property shall be developed in two phases:

Phase I

Demolition of the three fuel oil storage tanks. This would allow for use of the Property for construction staging in connection with Art Center’s proposed development of student housing on the property located across Glenarm Street to the north of the Property.

Phase II

Construction of a five-story, above ground parking structure containing approximately 285 parking spaces (57 spaces per level). The structure will be approximately 105,000 sq. ft. on a 30,640 sq. ft. site. Parking would be primarily available to Art Center students, faculty, staff, and visitors.

Applicable Development Standards

Building Height. Building height for new construction shall not exceed 56 feet, as set forth in the Zoning Code for this site.

General. The design of new construction shall be coordinated and sympathetic in scale, massing, orientation, materials and detailing with existing structures in the adjacent area, and in accordance with the Private Realm Urban Design Framework Plan of the South Fair Oaks Specific Plan. Consideration shall also be given to coordinating the design of the new construction with the historic character of the Glenarm Power Plant and the distinctive architecture of the Art Center South Campus structures north of Glenarm Street.

Vehicular Access. The primary ingress and egress for the construction staging area as well as future parking structure on Parcel B shall be in alignment with the existing intersection of Glenarm Street and Raymond Avenue. All access driveways shall be approved by the City Traffic and Transportation Engineer.

9. Surrounding Land Uses and Setting:

Surrounding land uses include the MTA Gold Line right-of-way and a city-owned surface parking lot to the east, Pasadena Water & Power utility uses to the west and south, and the existing Art Center South Campus to the north.

10. Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement):

The Pasadena City Council will review and take action on a Development and Lease Agreement (DLA) for the property. Zoning Administrator approval will be required for Phase I use of the parcel for construction staging. Phase II plans for development of the parking structure will require Master Development Plan Amendment review and recommendation from the Planning Commission as well as approval by the City Council in order to incorporate the boundaries of Parcel B into the existing Art Center South Campus Master Plan area, as well as to allow for use of the parking structure in connection with the College—Traditional Campus Setting land uses north of Glenarm Street. A zone change will be required to allow for the College—Traditional Campus Setting land use within the IG zoning district. Zone changes are reviewed by the Planning Commission and City Council. The City of Pasadena's Departments of Public Works, Transportation, Fire, and the Building Division will review the project. Additionally, the architectural design of the project will be subject to review and approval by the City's Design Commission.

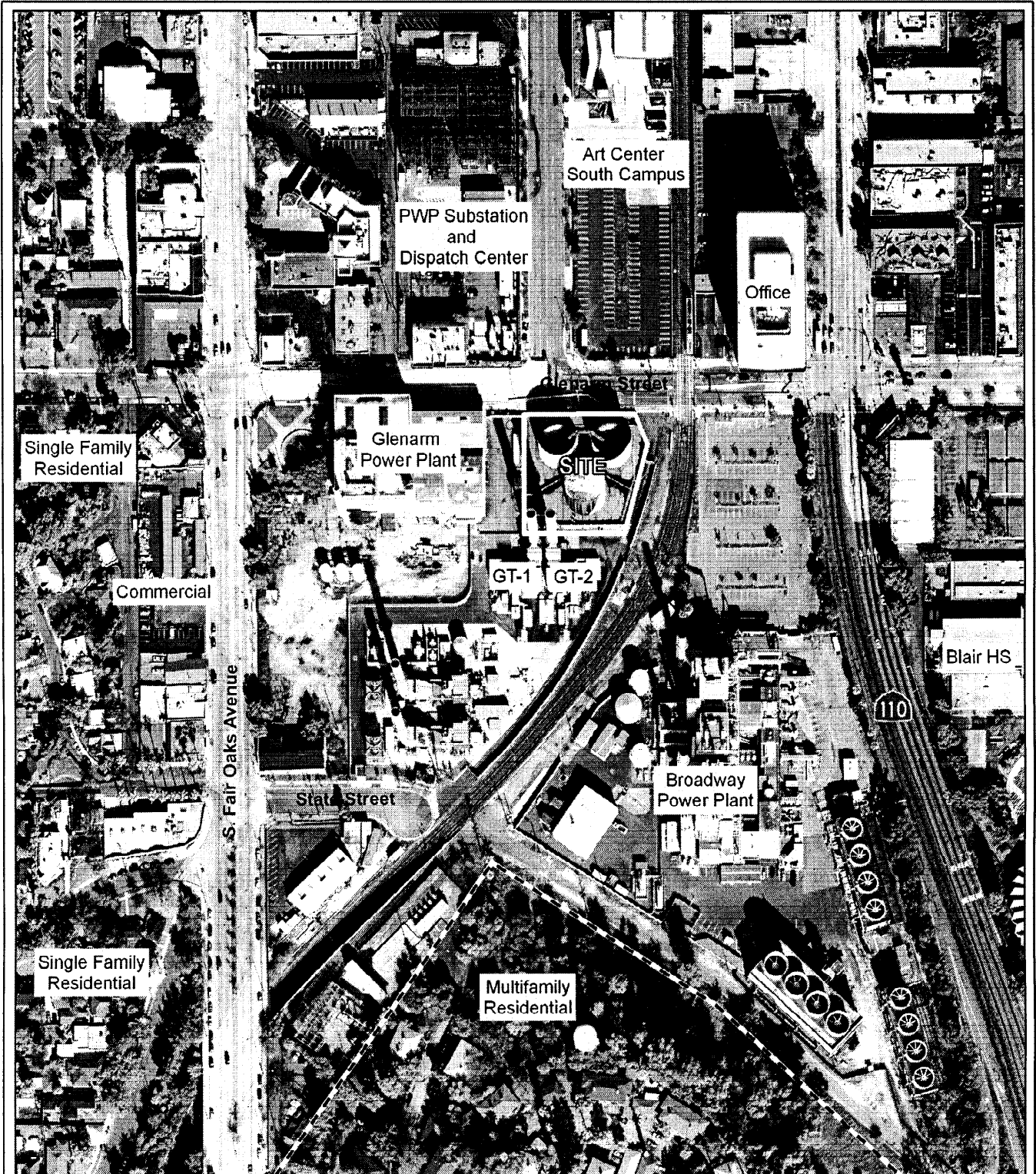
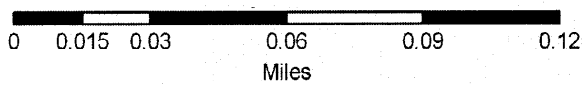


FIGURE 1

Project Site and Surrounding Uses



- Project Boundary
- · - City Boundary

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

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

Prepared By/Date _____

Reviewed By/Date _____

Erin Clark
Printed Name

Printed Name

Negative Declaration/Mitigated Negative Declaration adopted on: _____

Adoption attested to by: _____
Printed name/Signature Date

**Potentially
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Mitigation is
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**Less Than
Significant
Impact**

No Impact

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
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SECTION II - ENVIRONMENTAL CHECKLIST FORM

1. BACKGROUND.

Date checklist submitted: January 9, 2008
 Department requiring checklist: Planning and Development Department
 Case Manager: Erin Clark (626-744-6708)

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

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

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

WHY? The project site is in an area that offers views of the San Gabriel Mountains. The proposed building, however, would be five stories and 56 feet tall, which is the maximum height limit allowed within the applicable zoning district and the South Fair Oaks Specific Plan area.

The project site is immediately surrounded by Pasadena Water and Power Department equipment to the south and east, from which views of the mountains are not currently available. Therefore, the proposed project would not obstruct views from these structures. There are multifamily residential uses south of the power plant site that have limited views of the mountains, but are largely obstructed by mature trees and other landscaping. These residences are also located at a higher elevation than the project site. Accordingly, the view to the power plant site itself would be altered with addition of the proposed project, but views beyond the project site would be largely unchanged.

In accordance with section 17.61.030 of the City's Zoning Code, the design of this project, including its obstruction of any scenic vista or view, will be reviewed by the Design Commission. Although the project would not significantly impact a scenic vista, this regulatory procedure provides the City with an additional layer of review for aesthetics, and an opportunity to incorporate additional conditions to increase the aesthetic value of the project.

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

WHY? The only designated state scenic highway in the City of Pasadena is the Angeles Crest Highway (State Highway 2), which is located north of Arroyo Seco Canyon in the extreme northwest portion of the City. The project site is not within the viewshed of the Angeles Crest Highway. Therefore, the proposed project would have no impacts to state scenic highways.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The project site is, however, within one block of the Pasadena Freeway (Route 110) corridor, which was identified in the 1987 Environmental Quality Element of the City's General Plan as an unofficial City-Designated Scenic Corridor. Although the project site is near a locally-recognized scenic roadway corridor, the proposed project would not damage any scenic resources, and would not otherwise affect the visual quality of the roadway corridor.

The proposed project is in a largely developed commercial/industrial district and would not result in the destruction of any landmark eligible trees, stand of trees, rock outcropping or natural feature recognized as having significant aesthetic value.

The proposed site has not been designated as a historic resource, but it is located adjacent to the Glenarm Power Plant building, which is a National Register-eligible historic building located two blocks west of the Pasadena Freeway. The primary views of the Glenarm Power Plant building are from S. Fair Oaks Avenue and Glenarm Street to the west and north respectively. The historic-eligible power plant building does not contribute to the visual character of the Pasadena Freeway. At present, only limited views are available of the historic building from the Pasadena Freeway and, therefore, the proposed project would not adversely impact a visual resource along the scenic corridor. The project is not part of a landmark district.

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

WHY? The proposed project consists of developing an approximately 105,000sf parking structure on a 30,640sf parcel that is currently the site of three empty fuel-oil tanks that were formerly used by the Pasadena Department of Water and Power. The parcel is located in a largely developed commercial/industrial area of the City. 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 the Design Commission prior to the issuance of any building permits. Approval of the proposed project would not lead to any demonstrable negative aesthetic impact.

As required by section 17.61.030 of the Pasadena Municipal Code, the design of this project will be reviewed for approval by the Design Commission. This regulatory procedure was established to ensure that the design, colors, and finish materials of development projects comply with adopted design guidelines and achieve compatibility with the surrounding area. Although the project would not substantially degrade the visual character of the site and surroundings, this regulatory procedure provides the City with additional layer of review for aesthetics, and an opportunity to incorporate additional conditions to increase the aesthetic value of the project.

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

WHY? The project will not have a significant impact on light and glare because it will be required to comply with the standards in the Zoning Code that regulate glare and outdoor lighting. Height and direction of any outdoor lighting and the screening of mechanical equipment must conform to Zoning Code requirements. The project does not propose any lighting for nighttime events or sporting activities. The only outdoor lighting included in the project are pedestrian safety lighting and landscaping lights. The project is in an older, developed or commercial/industrial 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.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The proposed project is 5 stories and 56 feet in height. This height matches the 56 foot height limit in the IG-SP2-HL56 zoning district. The surrounding buildings range from 36 to 72 feet in height, and the two gas turbine towers south of the project site reach heights of 125 feet. The proposed project may cast shadows on adjacent sites; however, no significant impact is expected to occur since this shadow pattern will not affect adjacent uses.

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 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.

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

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

Potentially Significant Impact

Significant Unless Mitigation is Incorporated

Less Than Significant Impact

No Impact

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

a. Conflict with or obstruct implementation of the applicable air quality plan? ()

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 2007 AQMP, adopted on June 1, 2007. This plan is the South Coast Air Basin's portion of the State Implementation Plan (SIP). This plan is designed to achieve the five percent annual reduction goal of the California Clean Air Act.

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

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

The proposed project is not consistent with IG Zoning in that it would be built in support of a College—Traditional Campus Setting land use that is not currently allowed within the IG zone. The project is, however, consistent with the General Plan Land Use designation for the site, and stand-alone commercial parking structures are allowed by right within the IG zone. As the proposed project consists of a parking structure that would serve an existing use rather than introduction or expansion of a new use, 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 cause no related 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.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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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 2007 Air Emissions From Land Development" model (URBEMIS model) using the following assumptions:

- The project consists of an interim construction staging area and subsequent development of an approximately 105,000sf parking structure.
- The proposed project would not generate any additional traffic.
- Construction will start in November 2009 and be completed in October 2010.
- Demolition of the existing facilities will take 45 days and involve the following equipment: 3 concrete/Industrial Saws, 1 crane, 2 crawler tractors, 6 off highway trucks, 1 rubber tired loader, and 1 tractor/loader/backhoe.
- Grading of the 0.70-acre site will take 1 month and involve the following equipment: 1 grader, 1 rubber tired loader, and 1 tractor/loader/backhoe.
- Construction of the proposed structure will take 12 months, which includes 3 months to apply architectural coatings. Construction is expected to involve the following equipment: 1 crane, 2 off highway trucks, 1 paver, 1 rubber tired loader, 1 tractor/loader/backhoe, and 1 trencher.

Table 5.1 presents the estimated air quality emission of the proposed project as calculated by the URBEMIS model.

Table 5.1 Project Air Emissions/AQMD Threshold Comparison Matrix

	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	1.85	75	101.26
NOx	55	1.07	100	66.35
CO	550	5.06	550	28.90
SO ₂	150	0.00	150	0.01
PM10	150	0.41	150	0.05

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

As shown in Table 5.1, the proposed project would not exceed the Thresholds of Significance established by the SCAQMD for NOx, CO, SO₂, and PM₁₀ for operational and construction emissions. Therefore, the proposed project would not cause a violation of an air quality standard for these emissions and would have no significant related impacts.

The ROG emissions calculated for the proposed project by the URBEMIS model, however, are above the accepted daily emission level for construction of 75 lbs/day. The calculated ROG emissions would be almost entirely from application of architectural coatings (i.e., from painting the structure). The URBEMIS model assumes the entire structure will be painted and does not account for the use of pre-coated building materials and assumes all structure elevations would be painted regardless of the use. As such, for facilities such as parking structures, the URBEMIS overestimates ROG emissions from paints. To ensure ROG emissions remain below the SCAQMDs daily emission thresholds, Mitigation Measure AQ-1 requires painting to be limited to 100 gallons/day and limits the volatile organic compound (VOC) level in paints to

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100 grams/liter (g/l) or less. With the incorporation of this mitigation measure, the proposed project would not generate any pollutants in excess of the SCAQMDs thresholds of significance and the project would not cause any significant air quality impacts.

Mitigation Measure AQ-1: To reduce the amount of painting required, pre-coated building materials shall be utilized where feasible. When painting is required, the paint used shall have a VOC content of 100 grams/liter (g/l) or less and application of paint shall be limited to 100 gallons/day.

With respect to potential Greenhouse Gas emissions, the project would not generate any additional Greenhouse Gases in the long-term because the proposed parking structure itself will not generate any vehicle trips. Rather, the project will satisfy the parking demand generated by the existing Art Center South Campus. In addition, the parking structure will use only a minimal amount of energy for lighting and other ancillary equipment (e.g. entrance and exit gates).

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

WHY? The City of Pasadena is within the South Coast Air Basin (SCAB). This basin is a non-attainment area for Ozone (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, after mitigation the proposed project will not exceed the SCAQMD's Thresholds for Significance. The SCQAMD 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 with the incorporation of mitigation measures to reduce the impact of ROG emissions, the project would not result in a cumulatively considerable net increase of any criteria pollutant, and the project would have no related significant impacts.

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

WHY? According to Figure 5-1 and Table 5-1 of the 1993 SCAQMD's CEQA Air Quality Handbook the project is not located near sensitive receptors and would not generate any significant toxic air emissions. The project consists of developing a 105,000sf parking structure on a site that is surrounded by the MTA Gold Line right-of-way and a city-owned surface parking lot to the east, Pasadena Water & Power utility uses to the west and south, and a parking lot on the existing Art Center South Campus to the north. There are no existing sensitive receptors adjacent to the site or in the project vicinity. As such, the proposed project would not impact any existing sensitive air pollutant receptors.

It should be noted that the Art Center intends to develop student housing on their existing parking lot across Glenarm Street from the project site. Residents of the student housing would be sensitive receptors to air pollution. Regardless, the proposed project would not generate concentrations of air pollutants that would affect any sensitive receptors. By far, the greatest amount of localized air pollutants that would be

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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generated by the project would be during construction. As discussed above, after mitigation none of these pollutants would exceed the SCAQMDs thresholds of significance. Furthermore, many of these pollutants – notably ROG and NOx – are secondary pollutants typically travel several miles from their source before converting into unhealthful compounds. Therefore, even if the proposed student housing is constructed and occupied prior to completion of the subject parking structure, the proposed project would not expose sensitive receptors to substantial pollutant concentrations.

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?*
()

WHY? The project is in a developed urban area, identified as the South Fair Oaks Specific Plan area. There are no known unique, rare or endangered plant or animal species or habitats on or near the site.

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

WHY? There are no designated natural communities in the City. 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.

Furthermore, the project is located in a developed urban area. There is currently no vegetation present onsite and 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?* ()

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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?* ()

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 no trees protected by this ordinance or trees designated as landmarks. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, and would have no related impacts.

f. *Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan?* ()

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

7. CULTURAL RESOURCES. Would the project:

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

WHY? The proposed project requires the demolition and removal of three fuel oil tanks. The tanks are not listed as eligible for national or local historic resource designation within the South Fair Oaks Specific Plan. Art Center College of Design—Parcel B Parking Structure Initial Study Date Prepared 1/9/08

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

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

WHY? There are no known prehistoric or historic archeological sites on the project site. In addition, the project site does not contain undisturbed superficial soils. The site was formerly used by the Pasadena Department of Water and Power for fuel oil storage and is 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 has either removed or destroyed them. Consequently, surficial soils on the project site are devoid of archaeological resources.

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

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

WHY? The project site lies on the valley floor in an urbanized portion of the City of Pasadena that has been disturbed by past human activities. This portion of the City does not contain any unique geologic features and is not known or expected to contain paleontological resources. Additionally, the project would require minimal excavation and grading associated with the removal of the existing fuel oil tanks and subsequent grading and installation of building pads and foundations. These activities would result in minimal disturbance of the project site in areas that have been previously disturbed. Therefore, the proposed project would not destroy a unique paleontological resource or unique geologic feature, and would have no related impacts.

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

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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8. **ENERGY.** Would the proposal:

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

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

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

Why?

Oil-Based Products: The proposed project will not create a high enough demand for energy to require development of new energy sources. Construction of the project will result in a short-term insignificant consumption of oil-based energy products. However, the additional amount of resources used will not cause a significant reduction in available supplies. As the project consists of a parking structure to serve existing and previously-approved campus developments, the project itself will not generate additional trips, nor increased gasoline consumption.

Energy: As the proposed project consists of a stand-alone parking structure, 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.

Water: The proposed project consists of a stand-alone parking structure that will replace existing fuel-oil storage tanks. Neither use is a significant consumer of water resources. Accordingly, there is unlikely to be a net change in water consumption for the site. As there are no building plans for the proposed project at this time, the specific impacts of such a future development are too speculative to evaluate. However, if water is to be used for secondary purposes such as maintenance or restrooms, this impact will be mitigated during drought periods by the applicant adhering the Water Shortage Procedures Ordinance, which restricts water consumption to 90% of expected consumption during each billing period. Installation of plumbing will be inspected by a Building Inspector prior to issuance of a Certificate of Occupancy.

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9. GEOLOGY AND SOILS. Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ()

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

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

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

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

The project site is located approximately 6 miles south of the Sierra Madre Fault Hazard Management Zone, 3 miles south of a potentially active strand of the Sierra Madre Fault, and 0.5 miles north of the Raymond (Hill) Alquist-Priolo Earthquake Fault Zone.

The project site is located within the potential rupture zone of the Eagle Rock Fault. Therefore, the proposed project could expose people or structures to potential substantial adverse effects caused by the rupture of a known fault. Further investigation is required per Mitigation Measure GEO-1 below to characterize the potential for fault rupture onsite and identify the appropriate fault setbacks (if necessary) to incorporate into the proposed project. With the incorporation of this mitigation measure, fault rupture impacts are considered less than significant.

Mitigation Measure GEO-1: A geological study that may include fault-trenching of the Eagle Rock fault onsite shall be conducted as necessary. The study shall be conducted by State-certified engineering geologists following the guidelines established in the Alquist-Priolo Earthquake Fault Studies Act. The study shall be sufficient to ensure that excavations are conducted with an

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acceptable level of effort to determine whether or not there are active faults through the proposed development and if necessary, that suitable fault setbacks are defined. In the event that suitable fault setbacks meeting the satisfaction of the City Geologist or approved contractor are required but cannot be achieved, the project cannot be undertaken.

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 1-3 of the Technical Background Report for 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.

Liquefaction typically occurs where the ground water is less than 30 feet from the surface and the soils are predominantly of poorly compacted sand. The most likely places for liquefaction in Pasadena are the streambed area of the Arroyo Seco and Eaton Canyon Wash. According to a Soil Assessment Activities Summary of the site that was conducted in 1999 by Pacific Environmental Group, Inc., groundwater below the project site is found approximately 150 feet below the ground surface, and soils within and around the site are described as having "low permeability." 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? ()

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WHY?

The project site is not within a Landslide Hazard Zone as shown on Plate 1-3 of the Technical Background Report for the 2002 Safety Element of the General Plan. This Plate was developed considering the Earthquake-Induced Landslide areas as shown on the State of California Seismic Hazard Zone maps for the City. Therefore, the project will have no impacts from seismic induced landslides.

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

WHY?

Excavation and Grading: Construction of the project will result in a balanced import/export of soil. The project will cover approximately 64% of the site as compared to the present use, which occupies 28% 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 and, therefore, there will be no impact.

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

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

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

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.

As discussed in 9.a.iii., 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

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California Building Code, will ensure the project will not cause any 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? ()*

WHY? According to the Plate 2-1 of the Technical Background Report for the 2002 adopted Safety Element of the City's General Plan, the project site is underlain by alluvial material from the San Gabriel Mountains and stream channel deposits of gravel, sand, and silt. This soil is in the low to moderate range for expansion potential.

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

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

10. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

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

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

WHY? The proposed project site is currently occupied by three fuel oil tanks that have been located on the site since the mid-1970's. The two northernmost tanks (GT Fuel Tank No. 1 and GT Fuel Tank No. 2) are located adjacent to Glenarm Street, and were used to store diesel fuel for units GT-1 and GT-2 (gas turbines), which are still in operation. These tanks were emptied in the mid-1990's and are now capped with floating roofs. The third tank (Fuel Oil Tank No. 8) has a fixed roof and was used to store bunker fuel oil for the retired steam units G-8 and G-9 in the Glenarm Power Plant building. In 2002, the remaining fuel oil in Tank No. 8 was vacuum-pumped out and sold. What remains is approximately 9 to 12 inches (approximately 500 barrels) of residual material or sludge.

All three tanks measure 60ft in diameter. Tanks 1 and 2 are each 42ft 3in tall and hold a capacity of 20,000 barrels. Tank No. 8 is 48ft tall and holds a capacity of 22,000 barrels. All three tanks have carbon steel flooring.

In July, 1999, a Soil Assessment was prepared for the entire Glenarm Steam Plant property by Pacific Environmental Group. This study included four borings on the subject parcel (B17-B20) none of which was

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found to contain contaminants above any relevant action levels. As such, no further investigation of this portion (Area A10) of the Glenarm Steam Plant property was recommended at the time.

Art Center's proposed 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 proposed project involves removing the final amounts of residual material contained within Tank No. 8, which is approximately 671 barrels of material. The project involves removing the tanks and all ancillary equipment (e.g. underground pipes) from the project site. The following mitigation measure is required to reduce transport and disposal risks to less than significant:

Mitigation Measure HM-1: Prior to the issuance of buildings permits for the parking structure, the tanks on site shall be abandoned, closed and removed in accordance with applicable regulations and agency requirements and to the satisfaction of the Pasadena Fire Department.

Mitigation Measure HM-2: Prior to removal of Tank No. 8, all residual material shall be pumped out and disposed of in accordance with all applicable regulations and agency requirements and to the satisfaction of the Pasadena Fire Department. Also, to the satisfaction of the Pasadena Fire Department, a site-specific work plan, health and safety plan, and a hazardous material transport plan, shall be developed and implemented for this disposal.

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

WHY? Although the project site is within ¼ mile of Allendale Elementary School, Blair High School, and the existing Art Center College of Design South Campus. The proposed parking structure does not involve the handling of hazardous materials or substances. To facilitate the proposed project, the above-ground storage tanks onsite would be removed. Mitigation Measures HM-1 and HM-2 requires appropriate handling and disposal of the tanks and associated residual material (see 10 a-b). With the incorporation of these mitigation measures, the project would have no significant hazardous material impacts within ¼ mile of a school.

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? ()*

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WHY? The California Department of Toxic Substances Control (DTSC) EnviroStor database does not identify the project site as a cleanup site or hazardous waste permitted facility. The project site is an abandoned portion of Pasadena's Glenarm Power Plant. The Glenarm Power Plant itself is listed on the U.S. EPA's database of Air Releases (AIRS/AFS) and as a Handler pursuant to the Resource Conservation and Recovery Act (RCRA). These designations are in relation to the power plant's operation of gas turbines and associated equipment/materials. The presence of the power plant on these databases has no affect on the development of the project site with a parking structure.

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

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

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

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

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

WHY? The 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.

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.

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? ()

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

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

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

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

The project consists of developing a 105,000sf parking structure. This proposed use is not a point source generator 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 that the proposed project would not violate any water quality standards or waste discharge requirements, and would have no related significant impacts.

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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 project does not include any water supply component, such as sinks or toilets, and will only require water for landscaping upkeep. A landscape plan has not been completed at this point, but it is anticipated that on-site landscaping will be of a drought tolerant variety such that landscaping water usage will be minimal. This minor amount of water use would not result in significant impacts from depletion of groundwater supplies.

In December of 2007, the City of Pasadena adopted a finding that a projected water shortage existed within the City, and adopted Water Shortage Plan I pursuant to Pasadena Municipal Code 13.10.040. Unless the finding and Plan are withdrawn prior to construction, the project must comply with the Water Shortage Procedures Ordinance (Chapter 13 of the Pasadena Municipal Code). To ensure compliance, the applicant shall submit a water conservation plan limiting the project's water consumption to 90% of its originally anticipated 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. Through this reduction of its water supply needs, the project's incremental effect to a cumulative water supply impact is reduced to less than cumulatively considerable.

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 into the City's storm drain system. The project site does not contain any discernable streams, rivers, or other drainage features. Development of the site will involve minor grading, but will not substantially alter the drainage pattern of the site or surrounding area.

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

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Although the project would change the site's drainage pattern, the project would not result in substantial erosion or siltation. As discussed above, the project is subject to NPDES requirements, including the County-wide MS4 permit and the City's SUSMP ordinance. In accordance with these requirements, the applicant is required to submit a plan to the City that demonstrates how the project will comply with the City's SUSMP. To comply with the SUSMP, the project must implement Best Management Practices (BMPs) that reduce water quality impacts, including project erosion and siltation, to the maximum extent practicable. Complying with the City's SUSMP and implementing the required BMPs will ensure that the proposed project would not result in significant erosion or siltation impacts due to changes to drainage patterns.

- d. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site? ()*

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

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

The City of Pasadena contains two streams the Arroyo Seco and Eaton Creek, the project is not located near either stream. The project will not substantially alter the course of these streams or any ravines or gullies on the site.

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

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

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

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

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

The project, however, also has the potential to generate short-term water pollutants during construction, including sediment, trash, construction materials, and equipment fluids. The County-wide MS4 permit requires construction sites to implement BMPs to reduce the potential for construction-induced water pollutant impacts. These BMPs include methods to prevent contaminated construction site stormwater from entering the drainage system and preventing construction-induced contaminants from entering the drainage system. The MS4 identifies the following minimum requirements for construction sites in Los Angeles County:

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

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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WHY? The proposed project involves construction of a parking structure only. No housing is contemplated for this project, nor is it allowed on the site per current zoning regulations. Therefore, the project would not place housing within a flood hazard area or dam inundation area, and the project would have no related impacts.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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WHY? No portions of the City of Pasadena are within a 100-year floodplain identified by the Federal Emergency Management Agency (FEMA). As shown on FEMA map Community Number 065050, the entire City is in Zone D, for which no floodplain management regulations are required. Therefore, the

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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proposed project would not place structures within the flow of the 100-year flood, and the project would have no related impacts.

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

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

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

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

12. LAND USE AND PLANNING. Would the project:

a. *Physically divide an existing community?* ()

WHY? The project will not physically divide an existing community, as the site is surrounded by similar commercial and industrial development on all sides, and the project consists of an infill development within a highly urbanized area. No adverse impact will result.

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

WHY? The proposed project consists of a construction staging area and subsequent building of a parking structure to provide additional parking capacity for the Art Center College of Design South Campus. The project is, therefore, consistent with the General Plan land-use designation of South Fair Oaks Specific Plan which, as amended in 2005, permits the "Colleges-Traditional Campus Setting" land use. The current IG zoning of the site, however, does not currently permit the Colleges-Traditional Campus Setting land use for which the proposed parking structure would be built. Accordingly, a zone change will be required to remove this inconsistency or the applicant will be required to change the project to make it consistent with the zoning designation and policies. The zone change must be effective prior to the issuance of any building permits.