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The proposed project is not located within any of the fault zones mapped in the City's General Plan, including the Raymond (Hill) Fault Alquist-Priolo Earthquake Fault Zone. The closest fault zones to Chandler School are the Sierra Madre Fault, located approximately one mile from the site, and the Eagle Rock Fault, located 1.6 miles from the site. The potential exists for people and property to be exposed to the hazards of seismic activity in most of California. This project will not increase the potential occurrence of earthquakes. The risk of earthquake damage is minimized because the new structure shall be built according to the Uniform Building Code and other applicable codes, and is subject to inspection during construction. Further, structures for human habitation must be designed to meet or exceed California Uniform Building Code standards for Seismic Zone 4.

ii. Strong seismic ground shaking? ()

WHY? Any major earthquake along the San Andreas and Newport-Inglewood Fault 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. See 9.a.i.

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 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? According to State of California Seismic Hazard Zone Map (Pasadena Quadrangle) and the Seismic Hazards Map (Plate P-1) and Slope Instability Map, Chandler School is in an area with moderate slope instability. According to these same sources there is not any known historic evidence of landslides on the project site or adjacent properties. Existing City regulations will control any slope instability; therefore impacts will be less than significant.

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

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WHY? Construction of the project will lead to a net total of 3,000 cubic yards being exported. The California Building Code and building inspections ensure that construction activities do not create unstable earth conditions. The applicant must have an approved site to receive any exported cut earth. Because this project involves more than 250 cubic yards of cut or fill, the applicant's grading plan shall include an erosion and sediment transport control plan. The grading plan must be approved by the Building Official and the Public Works Department prior to the issuance of any building permits. 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, other applicable building regulations and standard construction techniques; therefore there will be no significant impact.

The natural water erosion potential of soils in Pasadena is low, unless these soils are disturbed during the wet season. Due to the gravelly surface layer and low topographic relief away from the steeper foothill areas of the San Gabriel Mountains, both the Ramona and Hanford soils associations have high permeability, low surface runoff, and slight erosion hazard. During construction, water erosion 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. Wind erosion will be controlled by proper grading techniques as specified in the grading ordinance. Soil erosion after construction will be controlled by implementation of an approved landscape and irrigation plan.

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 Geotechnical Engineering Exploration Update prepared by the J. Byer Group, Inc. (January 31, 2007) determined that the area where the new school building would be constructed is underlain by dense, cohesive, Pleistocene-age, older alluvium and alluvian fan deposits at two to four feet below existing grade. The area where the parking structure is proposed consists of older alluvium from two to ten feet below existing grade. The site is considered seismically stable and not subject to liquefaction.

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 2002 adopted Safety Element of the City's General Plan, the project site, like most of Pasadena, is underlain by alluvial soil. Alluvial soil consists primarily of sand and gravel and is in the low to moderate range for expansion potential.

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

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

10. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

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

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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? ()

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WHY? The project does not involve transport or storage of 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? ()

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WHY? Chandler School does not discharge hazardous emissions or handle hazardous materials, substances, or waste.

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 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 is currently open space and school structures, which are not land uses 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? ()

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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? ()

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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? ()

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WHY? The construction and operation of the proposed project would not place any permanent physical barriers on any existing public streets. Adherence to the zoning, building and fire code requirements ensures that the project will not interfere with, nor impair the implementation of, 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.

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 City's Fire Department, under local regulatory authority (Bates Method), has designated the area surrounding Chandler School as a Very High Fire Hazard Severity Zone (VHFHSZ). The project is required to meet the 2006 Wildland Urban Interface (WUI) Code (adopted by the City of Pasadena January 2008) and requirements in Chapter 7A of the California Building Code. The City's Park's and Natural Resources Division implements a vegetation management plan to maintain the slope areas around the Arroyo Seco free from fire hazards. The building layout ensures proper Fire Department equipment access. The project has adequate water flow for fire suppression and will include fire sprinklers throughout. Roofing materials and the landscape plan are subject to review and approval by the Fire Department. Furthermore, the Fire Department undertakes preventive measures, like including brush clearing and spraying vegetation with fire-resistive retardant foam along the slopes in the Central Arroyo before the Fourth of July Rose Bowl celebration, to ensure adequate fire safety within 200 feet of all buildings.

A Vegetation Management Plan (VMP) has been prepared by a Fire Safety Consultant, (Fire Cause Analysis, J. Zicherman, Ph.D., SFPE January 30, 2008) and is consistent with the WUI code. Preparation of the VMP was undertaken rather than use of the more restrictive, prescriptive standards of the WUI code that require extremely large defensible spaces. As part of the VMP, several mitigation measures are recommended to minimize the fire threat from the landscaping surrounding the proposed structures. For example, vegetation that is a fire hazard will be removed and replaced with low fuel volume (fire retardant) landscaping. Fire fuel management can be achieved with appropriate plant spacing of shrubs from trees and buildings. With the incorporation of the following Mitigation Measures, the new buildings and landscaping will not pose a significant fire hazard.

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MM HHM 1 – To the satisfaction of the Pasadena Fire Department, the applicant shall implement the Vegetation Management Plan including the removal of existing vegetation, adequate placement of new trees (horizontal clearance), and maintenance of adequate landscaping height beneath trees (vertical clearance).

MM HHM 2 – The applicant shall submit a maintenance program to the Zoning Administrator for review and approval as part of the landscaping plan. The applicant shall implement the approved maintenance program to the satisfaction of the Planning & Development Department and the Department of Public Works, Natural Resources Division.

MM HHM 3 – The applicant shall contract the services of a certified arborist to oversee required tree trimming.

MM HHM 4 – The landscape architect shall inspect and certify that the completed landscaping work in accordance with the landscaping plans, prior to issuance of a certificate of occupancy.

11. HYDROLOGY AND WATER QUALITY. Would the project:

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

WHY? 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. Section 303 of the Federal Clean Water Act requires States to develop water quality standards to protect the beneficial uses of receiving waters.

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. 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 the construction of new academic buildings for Chandler School. Chandler School 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,

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urban, 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 (an institutional development greater than 5,000 ft²), 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.

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. 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 5,191 gallons of water per day.

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

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

WHY? Because of the configuration of the site, runoff drains primarily as sheet flow from the north and east to the south and west. The project site does not contain any discernable streams, rivers, or other drainage features. Development of the site will involve grading, but will not substantially alter the drainage pattern of the site or surrounding area. 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 NPDES requirements, Best Management Practices (BMPs) shall be implemented that reduce water quality impacts, including erosion and siltation, due to changes to drainage patterns.

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

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WHY? The project would not result in on- or off-site flooding. The proposed peak discharge rate can be adequately handled by the City's existing downstream drainage facilities. Therefore, the proposed project would not cause flooding and would have no associated significant impacts.

The City of Pasadena contains two streams the Arroyo Seco and Eaton Creek. Chandler School is located adjacent to the Arroyo Seco but well outside of the bed and bank of this drainage facility. The project will not substantially alter the course of the Arroyo Seco. The project will not substantially alter the course the Arroyo Seco 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? ()

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WHY? The proposed project could increase runoff by increasing the impermeable surfaces onsite. However, 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, the project would generate only typical, non-point source, urban stormwater pollutants. These pollutants are covered by the County-wide MS4 permit, and the project, through the City's SUSMP ordinance, is required to implement BMPs to reduce stormwater pollutants to the maximum extent practicable. Therefore, the proposed project would not create runoff that would exceed the capacity of the storm drain system and would not provide a substantial additional source of polluted runoff.

f. Otherwise substantially degrade water quality? ()

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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;

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

Complying with the both the MS4's construction site requirements will ensure that construction of the proposed project would not substantially degrade water quality.

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

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

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

WHY? No portions of the City of Pasadena are within a 100-year floodplain. Therefore, the project would not impede or redirect flood flows.

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 an 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? ()

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

12. LAND USE AND PLANNING. Would the project:

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

WHY? The project will not physically divide an existing community. Chandler School is a private school within an established residential 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 General Plan designation for the existing project site is Institutional and the zoning designation is PS (Public and Semi-Public District). Both designations permit schools and other public and semi-public uses, are consistent with each other.

c. *Conflict with any applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP)?* ()

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.

13. MINERAL RESOURCES. Would the project:

a. *Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?* ()

WHY? No active mining operations exist in the City of Pasadena. There are two areas in Pasadena that may contain mineral resources. These two areas are Eaton Wash, which, was formerly mined for sand and gravel, and Devils Gate Reservoir, which was formerly mined for cement concrete aggregate. Chandler School is located in the Central Arroyo Seco, south of the Devils Gate Reservoir.

b. *Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?* ()

WHY? The City's 2004 General Plan Land Use Element does not identify any mineral recovery sites within the City. Furthermore, there are no mineral-resource recovery sites shown in the Hahamongna

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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Watershed Park Master Plan; or the 1999 "Aggregate Resources in the Los Angeles Metropolitan Area" map published by the California Department of Conservation, Division of Mines and Geology. No active mining operations exist in the City of Pasadena and mining is not currently allowed within any of the City's designated land uses. Therefore, the proposed project would not have significant impacts from the loss of a locally-important mineral resource recovery site. See also Section 13.a. of this document.

14. NOISE. Will the project result in:

a. *Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?* ()

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WHY? The project itself will not lead to a significant increase in ambient noise. The project does not involve installing a stationary noise source, and the only long-term noise generated by the project would be typical urban environment noise. The project would not expand outdoor play areas. Furthermore, in Pasadena many urban environment noises, such as leaf-blowing and amplified sounds, are subject to restrictions by Chapter 9.36 of the Pasadena Municipal Code.

The project would generate short-term noise due to construction activities. However, the project will adhere to City regulations governing hours of construction, noise levels generated by construction and mechanical equipment, and the allowed level of ambient noise (Chapter 9.36 of the Pasadena Municipal Code). In accordance with these regulations, construction noise will be limited to normal working hours (7 a.m. to 7 p.m. Monday through Friday, 8 a.m. to 5 p.m. on Saturday, in or within 500 feet of a residential area). A construction related traffic plan is also required to ensure that truck routes for transportation of materials and equipment are established with consideration for sensitive uses in the neighborhood. A traffic and parking plan for the construction phase will be submitted for approval to the Traffic Engineer in the Transportation Department and to the Zoning Administrator prior to the issuance of any permits. Therefore, adhering to established City regulations will ensure that the project would not generate noise levels in excess of standards.

The project would also not expose persons to excessive noise. The 2002 adopted Noise Element of the Comprehensive General Plan contains objectives and policies to help minimize the effects of noise from different sources. According to Figure 2 of the City's Noise Element (2002) the project site lies between the 50 and 60 dBA noise contours. This level of noise is within the "Clearly Acceptable" range for the proposed land use, as shown in Figure 1 of the City's Noise Element (2002). Therefore, the project would not expose future students of Chandler School to noise levels in excess of standards.

b. *Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?* ()

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WHY? The project is not located near any sources of groundborne noise or vibration.

c. *A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?* ()

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Potentially Significant Impact

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WHY? The project will not lead to a significant permanent increase in ambient noise. The project does not involve installing a stationary noise source, and the long-term noise generated by the project would be typical noise associated with operation of a private school. See response to 14.a.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? ()

WHY? The project would generate short-term noise due to construction activities. The project will adhere to City noise regulations (Chapter 9.36 of the Pasadena Municipal Code). However, coring or the use of jack hammers may be necessary because cemented layers and large boulders may be encountered in the soils (older alluvium) during excavation for the proposed parking structure and elevator tower. See response to 14.a.

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 expose people residing or working in the project area to excessive noise levels? ()

WHY? There are no airports or airport land-use plans in the City of Pasadena. The closest airport is the Bob Hope Airport (formerly the Burbank-Glendale-Pasadena Airport), which is located more than 10 miles from Pasadena in the City of Burbank. Therefore, the proposed project would not expose people to excessive airport related noise and would have no associated impacts.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? ()

WHY? There are no private-use airports or airstrips within or near the City of Pasadena.

15. POPULATION AND HOUSING. Would the project:

a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? ()

WHY? Chandler School is a use consistent with the land use designations for the site (See Section 12 of this document). Therefore, the proposed project is consistent with the growth anticipated and accommodated by the City's General Plan. Furthermore, the project is located in a developed urban area with an established roadway network and in-place infrastructure. Thus, development of the proposed project would not require extending or improving infrastructure in a manner that would facilitate off-site growth. Therefore, the proposed project would not induce substantial population growth, and would have no related significant impacts.

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? ()

Potentially Significant Impact

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No Impact

WHY? The project site does not contain any existing dwelling units. Therefore, the proposed project would not displace any residents or housing, and would have no related impacts.

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? ()

WHY? The subject site is currently developed as a private school. The project site contains a dwelling unit for a custodian in an administrative building. The subject building is not included in the proposed project. Therefore, the proposed project would not displace any people, and would have no related impacts.

16. PUBLIC SERVICES. Will the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire Protection? ()

WHY? The proposed project will not result in the need for additional new or altered fire protection services and will not alter acceptable service ratios or response times. The project will incorporate safety and security features, including fire sprinklers, alarm systems, adequate access for emergency vehicles and low fuel volume (fire retardant) landscaping. The project is not large enough to require the development of additional Fire Department facilities. Therefore, the proposed project would not significantly impact fire protection services.

b. Libraries? ()

WHY? The project is located one mile from the nearest branch library (La Pintoresca Branch). The City as a whole is well served by its Public Information (library) System; and the project would not significantly impact library services.

c. Parks? ()

WHY? The project is located adjacent to the Central Arroyo/Brookside Park. The proposed project is a non-residential project that would not directly increase the City's population. However, there is a potential for an increase in usage of park space given the new students associated with the proposed project. Once the project is complete, adequate outdoor and indoor recreation areas will be provided. Thus, the project will not require new or expanded parks.

d. Police Protection? ()

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Less Than Significant Impact

No Impact

WHY? The proposed project will not result in the need for additional new or altered police protection services and will not alter acceptable service ratios or response times. The project itself is not large enough to require the development of additional Police facilities. Therefore, the proposed project would not significantly impact police protection services.

e. Schools? ()

WHY? The City of Pasadena collects a Pasadena Unified School District (PUSD) Construction tax on all new construction. Payment of this fee mitigates any impacts on schools. Regardless, the project consists of expanding a private school and, as such, would not increase demands on public schools.

f. Other public facilities? ()

WHY? The project's development may result in additional maintenance of public facilities. However, with the projected revenue to the City in terms of impact fees, increased property taxes, and development fees this impact is not significant.

17. RECREATION.

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? ()

WHY? Chandler School is adjacent to Brookside Park. A short-term park usage increase will occur during construction. Chandler School intends to use Brookside Park while temporary classrooms and construction staging occupy the center field and other areas of the campus. The project itself would not lead to substantial physical deterioration of any recreational facilities, and would have no related significant impacts. An impact fee for non-residential projects is collected to fund the City's park maintenance and improvement program.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? ()

WHY? The project does not include recreational facilities and would not require the construction or expansion of recreational facilities. Therefore, the proposed project does not involve the development of recreational facilities that would have an adverse effect on the environment, and would have no associated impacts.

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18. TRANSPORTATION/TRAFFIC. Would the project:

a. Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)? ()

WHY? Chandler School is located at the intersection of Armada Drive and Prospect Boulevard at the top of the Arroyo Bank Slope. Chandler School is supported by a roadway network consisting of Lincoln Avenue, Mountain Street, and Orange Grove Boulevard, which are Principal Mobility/Multimodal Corridors.

A traffic study was completed for the project by Willdan, Inc. on September 28, 2007. The final traffic impact study is available for review at the Permit Center (Hale Building), 175 North Garfield Avenue Pasadena, CA 91109-7215. As identified in this traffic study, vehicular traffic will increase along Prospect Boulevard and Seco Street primarily during weekday mornings and afternoons. The project would add approximately 74 vehicle trip ends a day to traffic, including 36 trips in the morning and 17 trips in the afternoon peak hours. The project will result in a 0.35% and 0.24% increase to Prospect Boulevard north and south of Armada Drive, respectively. The project will also result in an increase of 1.72% to the average daily traffic (ADT) volume on Seco Street east of Rosemont Avenue. The increase in ADT is not considered a significant impact to the City street network. However, staff review and conditions are required for these less than significant impacts.

b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways? ()

WHY? The Los Angeles County Metropolitan Transportation Authority (MTA) adopted their most recent Congestion Management Program (CMP) in 2004. The traffic study evaluated the project's potential impacts to three intersections, none of which are on the CMP highway and road system. The Intersection Capacity Utilization (ICU) and Highway Capacity Manual (HCM) methodologies were used to evaluate the operating conditions at the signalized intersection of Lincoln Avenue, Mountain Street, and Seco Street and two un-signalized intersections at Lincoln Avenue, Forest Avenue, and La Mesa Place and Rosemont Avenue and Seco Street. The ICU values are related to the levels of service (LOS). Both the Los Angeles County CMP and the City's "Transportation Impact Review Current Practice and Guidelines" thresholds were used to evaluate the intersection impacts.

As identified in this traffic study the project would not cause any of the evaluated intersections to operate at an unacceptable LOS, and would not increase the volume-to-capacity (V/C) ratio of any intersections by 0.02 or more. The change in intersection V/C ratios are 0.013 and 0.006 at Lincoln/Seco-Mountain; 0.000 and 0.008 at Lincoln-Forest/La Mesa; and 0.002 and 0.002 at Rosemont /Seco (a.m. & mid day). Therefore, the proposed project would not exceed, either individually or cumulatively, an established level of service standard, and would have no related significant impacts.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? ()

WHY? The project site is not within an airport land use plan or within two miles of a public airport or public use airport. Consequently, the proposed project would not affect any airport facilities and would

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not cause a change in the directional patterns of aircraft. Therefore, the proposed project would have no impact to air traffic patterns.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? ()

WHY? The project has been evaluated by the PasDOT and Department of Public Works and meets the City's engineering standards. The school is not an incompatible use with the surrounding uses and vehicles can safely enter and exit the parking areas. The parking structure circulation and design has been found not to be hazardous to traffic along Seco Street. Therefore, the proposed project would not increase hazards due to a design feature or incompatible use, and would have no associated impacts.

e. Result in inadequate emergency access? ()

WHY? The ingress and egress for the site have been evaluated by the PasDOT and found to be adequate for emergency access or access to nearby uses. The project does not involve the elimination of a through-route, does not involve the narrowing of a roadway, and all proposed roadways, access roads and drive lanes meet the Pasadena Fire Department's access standards.

The project must comply with all Building, Fire and Safety Codes and plans are subject to review and approval by the Public Works and the Transportation Departments, and the Building Division and Fire Department. Therefore, there will be no significant impacts related to inadequate emergency access.

f. Result in inadequate parking capacity? ()

WHY? Due to the increased number of classrooms, the project will increase the demand for parking. The Armada Drive surface parking lot with 23 spaces and 63-space Seco Street Structure will provide the 86 parking spaces required by the Zoning Code. Therefore, the project is in compliance with this Code, and the project would have no impact to parking.

g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks)? ()

WHY? The project has been found to be consistent with the City's policies, plans, and programs supporting alternative transportation. The project is not near a principal mobility corridor according to the 2004 adopted Mobility Element of the General Plan. Therefore, the project would have no impact to alternative transportation.

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19. UTILITIES AND SERVICE SYSTEMS. Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? ()

WHY? The project would generate wastewater in the form of domestic sewage. Domestic sewage typically meets wastewater treatment requirements because wastewater treatment facilities are designed to treat domestic sewage. The project does not involve the release of unique or unusual sewage into the wastewater treatment system. Therefore, the project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, and would have no associated impacts.

The project will not exceed wastewater treatment requirements of the California Regional Water Quality Control Board, Los Angeles Region. Los Angeles County treats the City's wastewater, individual projects are subject to a Los Angeles County fee when the project is connected to a sewer line. The City is within Los Angeles County Sanitation District 16. There are no unusual wastes in the project's wastewater, which cannot be treated by L.A. County Sanitation District.

Sewer capacity deficiencies exist downstream of Chandler School as follows: on Seco Street from Prospect Boulevard to Rosemont Avenue, a distance of approximately 1,399 feet, and on or near Arroyo Boulevard from Seco Street to 860 feet south of Seco Street, and on or near Arroyo Boulevard at Holly Street, a distance of 328 feet. As a condition of approval, the applicant is required to either pay an in lieu fee to the City, or correct one of the deficiencies. The sewer improvements may incur less than significant, short-term impacts, such as construction noise and intermittent traffic disruptions.

MM UT 1 - The applicant shall either pay an in lieu fee to the City to the satisfaction of the Department of Public Works, or correct one of the sewer capacity deficiencies.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? ()

WHY? The proposed project would increase the demand for water and wastewater service. However, the proposed increase to water/wastewater service demand is negligible in comparison to the existing service areas of the water and wastewater service purveyors. In addition, the facilities currently maintained by the service purveyors are adequate to serve the proposed increase in demand. The only water and wastewater improvements required for the project are on-site unit connections to the existing systems, which are subject to connection fees; and, as discussed above in 19.a., sewer line improvements required to correct capacity deficiencies. The sewer capacity improvements may incur short-term less-than-significant construction related impacts, such as noise and intermittent traffic disruptions. Therefore, the proposed project would not require or result in the construction or expansion of new water or wastewater treatment facilities that would cause significant environmental impacts.

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? ()

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WHY? The project applicant must submit and implement an on-site drainage plan that meets the approval of the Building Official and the Public Works Department; and the City's SUSMP ordinance requires post-development peak storm water runoff rates to not exceed pre-development peak storm water runoff rates. Therefore, the proposed project would not require or result in any off-site stormwater drainage improvements and the project would have no related significant impacts.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? ()

WHY? The adequacy of water supply is a potential problem for all new development since the Southern California region has been known to experience periods of drought and needs a long-term reliable water supply. Under normal operation the project will use approximately 5,191 gallons of water per day. This project will result in a net increase of approximately 161 gallons per day in water consumption. According to the Water Division of the Pasadena Water and Power Department, there are sufficient water supplies available to serve the project from existing entitlements and resources.

e. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ()

WHY? As discussed in Section 19.b) of this report, the proposed project would increase the demand for wastewater service. The proposed increase to wastewater service demand is negligible in comparison to the existing service area of the wastewater service purveyor. In addition, the facilities currently maintained by the service purveyor are adequate. Therefore, the project would not result in insufficient wastewater treatment service, and would cause no related impacts.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? ()

WHY? The project is served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. The City of Pasadena is served primarily by Scholl Canyon landfill, which is permitted through 2025, and secondarily by Puente Hills, which was re-permitted in 2003 for 10 years.

The project is located within a developed residential area and within the City's refuse collection area. The project will not result in the need for a new or substantial alteration to the existing system of solid waste collection and disposal. The Solid Waste Division of the Pasadena Public Works Department has an active recycling program to reduce the metal, glass, plastics, newspapers and yard waste for disposal in approved landfills. Solid waste collection firms that serve the City keep records showing reduction of the amount of waste taken to land fills. Therefore, the project would cause no impacts under this topic.

g. Comply with federal, state, and local statutes and regulations related to solid waste? ()

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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WHY? In 1992, the City adopted the "Source Reduction and Recycling Element" to comply with the California Integrated Waste Management Act. This Act requires that jurisdictions maintain a 50% or better diversion rate for solid waste. The City implements this requirement through Section 8.61 of the Pasadena Municipal Code, which establishes the City's "Solid Waste Collection Franchise System". As described in Section 8.61.175, each franchisee is responsible for meeting the minimum recycling diversion rate of 50% on both a monthly basis and annual basis. The proposed project is required to comply with the applicable solid waste franchise's recycling system, and thus, will meet Pasadena's and California's solid waste diversion regulations. In addition, the project complies with the City's Construction and Demolition Ordinance (PMC Section 8.62) and design requirements for refuse storage areas (PMC Section 17.64.240). Therefore, the project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste.

In accordance with the Construction and Demolition Ordinance (Chapter 8.62 of the Pasadena Municipal Code), the applicant must submit a Construction Waste Management Plan, because the new structures are 1,000 or more gross square feet and the demolition consists of more than 1,000 gross square feet.

20. EARLIER ANALYSIS.

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).

- a) Earlier Analysis Used. There are no program EIR, tiering, or other process can be used for analysis of the project's environmental effects.
- b) Impacts Adequately Addressed. Project associated impacts has been addressed to the fullest extent in this Initial Study in compliance with the California Environmental Quality Act (CEQA).
- c) Mitigation Measures. The implementation of mitigation measures identified in this Initial Study will reduce potentially significant impacts to less than significant levels.

21. MANDATORY FINDINGS OF SIGNIFICANCE.

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? ()

WHY? As discussed in Sections 3 and 5 of this document, the proposed project would not have substantial impacts to Aesthetics or Air Quality. Mitigation Measures A1-A4 are included in Section 3 and will reduce potential impacts to a less than significant level. Also, as discussed in Section 6 and 11 of this document, the proposed project would not have substantial impacts to special status species, stream habitat, and wildlife dispersal and migration. Furthermore, the proposed project would not affect the local, regional, or national populations or ranges of any plant or animal species and would not threaten any plant communities. Similarly, as discussed in Section 7 of this document with the incorporation of mitigation measures, the proposed project would not have substantial impacts to historical, archaeological, or paleontological resources, and thus, would not eliminate any important examples of California history or prehistory. As discussed in Sections 11, 13 and 14 of this document, the proposed project would not have substantial impacts to water quality, Mineral Resources or Noise.

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Therefore, the project will not substantially degrade the quality of the land, air, water, minerals, flora, fauna, noise and objects of historic or aesthetic significance.

b. Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future project? ()

WHY? The proposed project would not cause impacts that are cumulatively considerable. The project has the potential to contribute to cumulative air quality, biological resource, hydrology, water quality, noise, population, housing, public services, recreation, traffic, and utility impacts. However, the project's contribution to these cumulative conditions is not considerable. A mitigation measure has been added to reduce sewer deficiencies to a less than significant level. Therefore, the proposed project does not have a Mandatory Finding of Significance due to cumulative impacts.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? ()

WHY? As discussed in Sections 5, 10, 11, and 18 of this document, the proposed project would not expose persons to the hazards of toxic air emissions, chemical or explosive materials, flooding, or transportation hazards. Section 9 of this document explains that although students of the proposed school would be exposed to typical southern California earthquake hazards, modern engineering practices would ensure that geologic and seismic conditions would not directly cause substantial adverse effects on humans. In addition, as discussed in Sections 3 Aesthetics, 12 Land Use and Planning, 14 Noise, 15 Population and Housing, 16 Public Services, 17 Recreation, 18 Transportation/Traffic and 19 Utilities and Service Systems the project would not indirectly cause substantial adverse effects on humans. Mitigation Measures are included for Aesthetics, Cultural Resources, Traffic and Utilities that will reduce all impacts to a less than significant level. Therefore, the proposed project would not have a Mandatory Finding of Significance due to environmental effects that could cause substantial adverse effects on humans.

INITIAL STUDY REFERENCE DOCUMENTS

- | # | Document |
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| 1 | Alquist-Priolo Earthquake Fault Zoning Act, California Public Resources Code, revised January 1, 1994 official Mt. Wilson, Los Angeles and Pasadena quadrant maps were released March 25, 1999. |
| 2 | CEQA Air Quality Handbook, South Coast Air Quality Management District, revised 1993 |
| 3 | East Pasadena Specific Plan Overlay District, City of Pasadena Planning and Development Department, codified 2001 |
| 4 | Energy Element of the General Plan, City of Pasadena, adopted 1983 |
| 5 | Fair Oaks/Orange Grove Specific Plan Overlay District, City of Pasadena Planning and Development Department codified 2002 |
| 6 | Final Environmental Impact Report (FEIR) Land Use and Mobility Elements of the General Plan, Zoning Code Revisions, and Central District Specific Plan, City of Pasadena, certified 2004 |
| 7 | 2000-2005 Housing Element of the General Plan, City of Pasadena, adopted 2002. |
| 8 | Inclusionary Housing Ordinance Pasadena Municipal Code Chapter 17.71 Ordinance #6868 |
| 9 | Land Use Element of the General Plan, City of Pasadena, adopted 2004 |
| 10 | Mobility Element of the General Plan, City of Pasadena, adopted 2004 |
| 11 | Noise Element of the General Plan, City of Pasadena, adopted 2002 |
| 12 | Noise Protection Ordinance Pasadena Municipal Code Chapter 9.36 Ordinances # 5118, 6132, 6227, 6594 and 6854 |
| 13 | North Lake Specific Plan Overlay District, City of Pasadena Planning and Development Department, Codified 1997 |
| 14 | Pasadena Municipal Code, as amended |
| 15 | Recommendations On Siting New Sensitive Land Uses, California Air Resources Board, May 2005 |
| 16 | Regional Comprehensive Plan and Guide, "Growth Management Chapter," Southern California Association of Governments, June 1994 |
| 17 | Safety Element of the General Plan, City of Pasadena, adopted 2002 |
| 18 | Scenic Highways Element of the General Plan, City of Pasadena, adopted 1975 |
| 19 | Seismic Hazard Maps, California Department of Conservation, official Mt. Wilson, Los Angeles and Pasadena quadrant maps were released March 25, 1999. The preliminary map for Condor Peak was released in 2002. |
| 20 | South Fair Oaks Specific Plan Overlay District Planning and Development, codified 1998 |
| 21 | State of California "Aggregate Resource in the Los Angeles Metropolitan Area" by David J. Beeby, Russell V. Miller, Robert L. Hill, and Robert E. Grunwald, Miscellaneous map no. .010, copyright 1999, California Department of Conservation, Division of Mines and Geology |
| 22 | Storm Water and Urban Runoff Control Regulations Pasadena Municipal Code Chapter 8.70 Ordinance #6837 |
| 23 | Transportation Impact Review Current Practice and Guidelines, City of Pasadena, August, 2005 |
| 24 | Tree Protection Ordinance Pasadena Municipal Code Chapter 8.52 Ordinance # 6896 |
| 25 | West Gateway Specific Plan Overlay District, City of Pasadena Planning and Development Department codified 2001 |
| 26 | Zoning Code, Chapter 17 of the Pasadena Municipal Code |
| 27 | Final Traffic Impact Study for Chandler School Master Development Plan prepared by Willdan, Inc. (September 28, 2007) |
| 28 | Vegetation Management Plan: Fire Hazard Mitigation & Defensible Space Report for Chandler School prepared by Fire Cause Analysis (January 30, 2008) |