

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

FINAL INITIAL STUDY

In accordance with the Environmental Policy Guidelines of the City of Pasadena, this analysis, the associated "Master Application Form," the Environmental Assessment Form (EAF) and supporting data constitute the Initial Study for the subject project. This Initial Study assesses a project with a defined scope of work and makes a determination concerning the effects that project will have on the environment.

SECTION I – PROJECT INFORMATION

1. **Project Title:** Maranatha High School Master Plan
2. **Lead Agency Name and Address:** City of Pasadena
 Planning & Community Development Department
 175 N. Garfield Avenue
 Pasadena, CA 91101
3. **Contact Person and Phone Number:** Vicrim Chima (626-744-6791)
4. **Project Location:** 169 S. St. John Avenue (northeast quadrant of the South Saint John Avenue/West Del Mar Boulevard intersection Pasadena, CA 91105)
5. **Project Sponsor's Name and Address:** Steve Lazarian/CityWorks
 2650 E. Foothill Boulevard, Suite 201
 Pasadena, CA 91107
6. **General Plan Designation:** Specific Plan
7. **Zoning:** West Gateway Specific Plan Area Sub-district 1-A
8. **Description of the Project:** Maranatha High School (MHS) has submitted an application for a campus wide Master Plan proposing to upgrade and expand their existing facilities. The proposed Master Plan would take place in three phases, with the expectation that each phase would take approximately 6 and ½ years to complete. MHS has provided this phasing plan and projected timeline only as a framework; projects are contingent upon the availability of funds.

The description of each phase as outlined below reflects an anticipated order of development based on the limitations of certain buildings, the site's geography, and the programmatic needs of the school. (As an example, the future outdoor swimming pool would need to be constructed prior to the conversion of the existing natatorium into classrooms and fine arts space). Except for certain conditions as noted, each phase could proceed independently of the other.

The MHS Master Plan does not propose to increase student enrollment or faculty/staff beyond the currently entitled limit. It proposes a maximum build out of the physical facilities needed to serve the 800 students and 120 full-time employees approved under the modification to the existing Conditional Use Permit #4367 which established this use at this location. The Master Plan is not proposing changes to vehicular to the drop-off/pick-up areas. The Master Plan will result in a total of approximately 29,000 square of new construction and 15,500 square of remodeled or converted space. Apart from the new construction and remodel or conversion of space, the project scope also calls for the installation of a perimeter fence around the campus, permitting after-the-fact signage, new outdoor swimming pool and two new sports courts.

PHASE I (4,500 Square feet new development, 0 square feet of remodeled or converted area)

- Construction of a new 4,500 square foot two story Administration Building shown as building “B” on the attached site plan. This portion of the work will also include parking lot renovations (re-stripping and exterior lighting) as well as a new campus signage at the front entry.
- New steel, painted perimeter fencing and entry/exit gates as shown on the proposed site plan.

PHASE II (0 Square feet of new construction, 13,500 Square feet of converted or remodeled area)

- Relocation of the existing indoor swimming pool from the Natatorium shown as building “F” to the south lawn.
- Conversion of the non-habitable indoor pool area (8,500 square feet) to habitable area. Upon completion of the conversion of the existing building, it will house up to 10 new classrooms, offices, storage and common area.
- Convert the existing subterranean black box theatre (5,000 square feet) in the basement of the Natatorium building into a multipurpose space. This area will be used as rehearsal space, a dance studio, music rooms, band rooms, dressing rooms and can also be utilized as a mini-theatre capable of seating 150 persons.
- Design and construct a new outdoor student quad to be located north of buildings “E” and “F”.
- Upgrades to buildings “E”, “F” and “G” for handicap accessibility including the installation of an elevator servicing all floors.
- Construction of new hard surface sports courts on the lawn south of building “G”.

PHASE III (24,500 Square feet new development, 2000 square feet of remodeled or converted space)

- Expand the existing football related facilities by adding new bleachers, a new press box and training facilities, office, and storage rooms. A total of 6,500 square feet of indoor space would be added. The bleachers would be erected at field level along with the new press box and the training facilities, offices, and storage would be built beneath the field, in the area below occupied by parking.
- Relocation of the existing sewer easement including the relocation of piping if required.
- Construction of a new 16,000 square foot academic building shown as building “H”. Structure to be two stories built on the south west side of the school’s gym.

- Enclosure of new 2,000 square foot utility structure.
- Construction of a new 1,500 square foot planetarium on the existing academic center roof shown as figure “D” which is part of building “C”.
- Construction of a new 500 square foot greenhouse outside of the existing academic center.

9. Surrounding Land Uses and Setting: The MHS campus occupies the southeast quadrant of the former Ambassador College Site located at 169 S. St. John Avenue in Pasadena, CA. The campus lot area measures approximately 330,000 square feet and is bounded by St. John Avenue / Interstate 710 on the east; Del Mar Boulevard on the south; the historic Manor Del Mar and the historic garden areas of the Ambassador Campus on the west; and the Ambassador Auditorium and Ambassador Great Lawn on the north. The areas of the former Ambassador Campus to the west are a mix of historic single-family residences (Ross Grove Landmark District among them) and early and mid 20th century apartment blocks. A pedestrian pathway along vacated Terrace Drive runs north-south the full length of the former Ambassador College and provides the primary circulation route through the campus.

The school’s campus is centered around the athletic field. The field serves as the roof over the main parking structure and is surrounded by campus’ three main buildings. These buildings include the Student Center (34,345 s.f.), Academic Center (40,543 s.f.), Gymnasium and Natatorium (32,525 s.f.), classrooms and offices (9,200 s.f.), and storage and miscellaneous structures (3,000 s.f.) for a total of 119,613 s.f. of existing building area. The campus includes a parking structure which accommodates 285 vehicles and a surface parking lot with 52 vehicle spaces for a total of 337 vehicles. The parking lots can only be accessed from S. St. John Ave. via Green Street or Colorado Blvd.

10. Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement): The Master Plan will be reviewed by the Historic Preservation Commission, Design Commission, and Planning Commission and will require adoption by the City Council. Individual building projects within the plan that are up to 25,000 s.f. of new construction will be subject to staff level design review, when such subsequent projects are proposed. Staff level design decisions are subject to call for review by either the Design Commission or City Council. Subsequent projects over 25,000 square feet of new construction are reviewed by the Design Commission. Design Commission decisions are appealable to the City Council.

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.	✓
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

Printed Name

Printed Name

Negative Declaration/Mitigated Negative Declaration adopted on: _____

Adoption attested to by: _____
Printed name/Signature
Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
 - 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
 - 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect is significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
 - 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less than Significant Impact.” The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 21, “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 21 at the end of the checklist.
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier documents and the extent to which address site-specific conditions for the project.
 - 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
 - 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
 - 8) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significant
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Potentially Significant 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: December 15, 2014
 Department requiring checklist: Planning & Community Development Department
 Case Manager: Vicrim Chima

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 not in an area that offers views of the Arroyo Seco, the San Rafael Hills, or Eaton Canyon. The project would not in any way obstruct the views of any of these scenic resources. The project site does afford clear perspectives of the San Gabriel Mountains, but the proposed new construction would not limit the view of the mountains from any of the public right-of-ways that surround the project site. There are only two proposed structures and one proposed fence that could affect existing sight lines. The proposed "building H" which would have an overall height of 24 feet and the proposed planetarium that is to be constructed on top of the existing Student Center with an overall height of 55 feet. The scale and location of the new structures would not obstruct views of the San Gabriel Mountains that are currently unobstructed. Building H would be immediately south of the existing gymnasium (building E) and building H would only marginally increase the level of obstruction of north-facing views of the mountains. Likewise, the proposed planetarium would only marginally increase the obstruction caused by the existing building C. The final object is a six foot tall tubular steel fence that will have an overall height of six feet. The fence would consist of ¾" pickets placed at intervals of four inches along the length of the fence. It is clearly discernible that neither the new structures nor the proposed fence would materially obstruct any view. Therefore, the project would have a less than significant impact to scenic vistas.

Further, in accordance with section §17.61.030 of the City's Zoning Code, any new construction up to 25,000 square feet is required to undergo design review at the staff level. The building phases subject to this level of review of design review would include the administration building (Building "B", 4,500 s.f.), new bleachers/weight room (Building "I", 6,500 s.f.), new classroom building (Building "H", 16,000 s.f.), Building "D" 1,500 s.f., and the new greenhouse structure 500 s.f. Although none of these projects would individually or collectively impact a scenic vista, this regulatory procedure would provide an additional layer of review that would consider and have the ability to analyze in detail the impacts of the building massing, exterior materials, and overall building height, as well as the opportunity to incorporate conditions to modify the project.

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

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

WHY? The 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 view shed of the Angeles Crest Highway, and not along any scenic roadway corridors identified in the City's General Plan documents. Therefore, the proposed project would have no impacts to state scenic highways or scenic roadway corridors. The proposed project 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.

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

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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WHY? The proposed project consists of a Master Plan for the southeast quadrant of the former Ambassador College, proposing 29,000 square feet of new construction and 15,500 square feet of converted building space of existing structures into new facilities for Maranatha High School. The Ambassador College campus is known for its large open spaces, density of trees, historic gardens, and a variety of architecture, from large-scale period revival single family residences to iconic mid-century institutional buildings. The variety of architectural styles and building types, as well as the individual quality of these varied resources contribute substantially to the visual character of the site. The proposed new construction would be located adjacent to existing structures on the campus. Only maximum development envelopes are proposed at this time, and information submitted by the applicant identifies the approximate building footprint and overall height. Proposed new construction under the Master Plan is required to be consistent with the development standards defined in the West Gateway Specific Plan (WGSP). These standards permit up to 72 feet (six stories) or equal in height to the Ambassador Auditorium Building, and structural setbacks along Del Mar Boulevard are required to be a minimum of 20-feet. The tallest structure proposed under the Master Development Plan is the planetarium addition which would increase the building's maximum height to 55 feet. The new two-story administration building (Building "B") has a proposed height of 24 feet with a setback greater than 20 feet as would the new two-story classroom building (Building "H"). Other proposed new development, such as the bleachers and new student quad, which consists of hardscape, landscaping and certain amenities, are located near the center of the campus between or adjacent to existing structures; even still, these structures must comply with the WGSP design guidelines.

The applicant has commissioned a design study (Onyx Architects, December 2013) of the campus, its adjacent structures, and open spaces. The study defined the project area and its surroundings as a variety of unique spaces along a garden path with pockets for intimate interaction and expansive open spaces for public interaction. The study also focused on the proposed new building sites; their location, their interaction with adjacent green space and a commitment to maintaining the iconic institutional identity of the campus. Further, there was a building context analysis that identified the character defining features of the existing structures, elements like elevated roof planes supported by columns, solid versus transparent panels, and exterior materials and colors. Having identified these features, a preliminary design study for the new buildings was created. The concept design for the new structures referred to and incorporated many of the landscaping and building elements that were identified on the campus. The study will serve as the first step in conducting further, more detailed design iterations as the project is adopted and implemented. The compliance of future onsite buildings with the design study is required by Mitigation Measure AES-1.

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Apart from the new construction and remodel or conversion of space, the project scope also calls for the installation of a perimeter fence around the campus and the legalization of identification and directional signage for the campus. The perimeter fence is a security necessity. Although, the former Ambassador Campus as a whole is characterized by series of open spaces and structures that are freely navigable, the installation of the perimeter fence has been deemed a necessity by Maranatha personnel. The fence has been designed to utilize existing structures to create a securable exterior barrier for the campus. Its placement has been specifically designed to minimize its impact on the sense of continuity and openness that defines the former Ambassador Campus while providing the perimeter security that is a necessity for the school. Prior to design revisions, the fence was placed at the edge of sidewalk and did not appear to respond to or otherwise consider any existing site feature. The redesigned fence has been setback, and existing buildings have been utilized to create a barrier that requires less fencing material which creates less of a visual impact. The fence design has been redesigned at several locations to augment the setback and create even less of an impact. The fence begins at the northeast corner of the Student center. Following a path which is setback the distance of the landscaped area around the nrother surface parking lot, it will proceed south, utilizing the exterior wall of the parking structure and it's existing gates and maintaining a significant setback all the way to southeast corner of the campus and along the southern border of the campus adjacent to West Del Mar Boulevard. Near the southwest corner of the campus a curve was incorporated to respond to the contour of the existing amphitheater, and the fencing proposed along the main north-south circulation path has also been set back to maintain a wider pathway for pedestrians and the feeling of more open space. The fence would not prevent free movement along the main pedestrian path linking the south portion of the Maranatha Campus with the Great Lawn and Merritt Garden. This north-south corridor would be open to public access with limitation, operating between seven a.m. and sunset. Further, the interconnected elevated plaza will remain freely traversable and the fence will in no way affect the ability for pedestrians to move between the entrances of the Student Center, the Administration Hall, and Ambassador Auditorium. While a security fence is necessary for the campus, the proposed configuration does not obstruct or otherwise make inaccessible the plaza-facing (i.e., the north elevation) and it also maintains open site lines and access paths among the critical structures that surround the plaza. Therefore, the proposed project would not have a significant adverse impact on aesthetic quality or character.

The Master Plan does not propose any changes to established standards for 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 prior to the issuance of any building permits. Approval of the proposed project would not lead to any demonstrable negative aesthetic impact. The historic gardens are not located on parcels controlled by Maranatha High School and are outside of the perimeter of the School's portion of the campus.

As required by Section 17.61.030 of the Zoning Code, the design of future buildings onsite up to 25,000 square feet will be reviewed for approval by the Director of Planning. 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 assurance that the project will comply with the applicable design guidelines. Projects proposed under this Master Development Plan that would be subject to staff level Design Review with approval by the Director of Planning include the proposed administration building (Building "B", 4,500 s.f.), new bleachers/weight room (Building "I", 6,500 s.f.), new classroom building (Building "H", 16,000 s.f.), Building "D" 1,500 s.f., and the new greenhouse structure 500 s.f.. Staff level approvals may be appealed to the Design Commission.

Mitigation Measure AES-1: To the satisfaction of the City of Pasadena's Design and Historic Preservation Staff, future onsite buildings resulting from the subject Master Plan shall be in compliance with the guidelines set forth in the *Master Plan Design Study that Includes Design Guidelines for the Future Development of Maranatha High School*, Onyx Architects, December 2013. The City's review for compliance with this measure shall occur prior to the issuance of a building permit and as part of the

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City's Design Review Process established by the thresholds contained within the West Gateway Specific Plan.

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

WHY? The project would not have a significant impact on light and glare because it is 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, in that fixtures are limited in height and required to direct light downward. The project does not propose any new lighting for nighttime events or sporting activities. The parking lot on the north side of campus which is illuminated by pole mounted lights will undergo the replacement of their fixtures as part of the master plan. There is no new lighting proposed for the new sports courts that are described in Phase II of the project scope. The only new outdoor lighting included in the project is pedestrian safety lighting and landscaping lights. The project is in a developed residential/commercial 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 aid in the public safety.

Exterior and interior lights and reflective building materials may be potential sources of light and glare. Use of reflective materials is required to conform to Zoning Code requirements and to evaluations of exterior cladding and materials through the City's design review process. Interior lighting would not shine onto surrounding properties, since most activity would occur during daylight hours; and all proposed exterior lighting is typical safety, landscape, and signage lighting, which are required to comply with the outdoor lighting standards in the zoning code. Part of the applicants design study identified existing materials used in the built environment, materials like painted concrete, masonry, opaque non-reflective wall tile, and marble panels. As new construction would utilize these or similar materials to achieve a sense of compatibility and cohesion with the existing structures, it is unlikely that any reflective building materials would be employed in the new construction, thereby having little to no effect on light or glare. The tallest structure proposed under the Master Development Plan will be the planetarium addition which would rise to 55 feet. The new two-story administration building (Building "B") has a proposed height of 24 feet with a setback greater than 20 feet as would the new two-story classroom building (Building "H"). However, the dense existing landscaping and tree canopy would effectively obscure sight lines to the new construction from the west and south. Night time athletic field lighting is not part of this entitlement. The proposed planetarium on the roof of the existing student center will not be equipped with a significant light generating source.

The design of this project, including its finish, colors, and materials, is required to be reviewed for approval through the Design Review process. The Planning Director approves the design for new construction up to 25,000 square feet. Projects of the Master Plan subject to design review include the Administration Center, new Student Center addition, and new Classroom Building. Staff level approvals may be appealed to the Design Commission. This regulatory procedure provides the City with assurance that the project will comply with the applicable design guidelines, including guidelines for light and glare.

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:

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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 land 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. *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220 (g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104 (g))?*

WHY? There is no timberland or Timberland Production zone in the City of Pasadena; therefore the proposed project would not result in the loss of forest land, timberland or Timberland Production areas.

d. *Result in the loss of forest land or conversion of forest land to a non-forest use?*

WHY? There is no forest land in the City of Pasadena; therefore the proposed project would not result in the conversion or loss of forest land.

e. *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.

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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 pollutants; 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 fully adopted plan is the 2007 AQMP, adopted on June 1, 2007. However, the SCAQMD adopted a 2012 iteration of the AQMP on December 7, 2012 and the California Air Resources Board (CARB) approved the 2012 AQMP on January 25, 2013. CARB submitted the 2012 AQMP to the U.S. Environmental Protection Agency (USEPA) for approval on February 13, 2013. 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 consistent with the Zoning and General Plan Land Use designations for the site. As a result, the project is consistent with the growth expectations for the region. Further, the SCAQMD also adopts rules to implement portions of the AQMP. Rule 403 requires the implementation of best available fugitive dust control measures during active construction activities capable of generating fugitive dust emissions from on-site earth moving activities, construction/demolition activities, and construction equipment travel. The proposed project is therefore consistent with the AQMP and the West San Gabriel Valley Air Quality Plan, and would have no associated impacts.

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

WHY? Due to its geographical location and the prevailing off shore daytime winds, Pasadena receives smog from downtown Los Angeles and other areas in the Los Angeles basin. The prevailing winds, from the southwest, carry smog from wide areas of Los Angeles and adjacent cities, to the San Fernando Valley and to Pasadena in the San Gabriel Valley where it is trapped against the foothills. For these reasons the potential for adverse air quality in Pasadena is high. Pasadena is located in a non-attainment area, an area that

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frequently exceeds national ambient air quality standards and, thus, is deemed a non-attainment basin for ozone (O₃), particulate matter (PM₁₀ and PM_{2.5}), lead, and nitrogen dioxide (NO₂) (state only).

The proposed project anticipates 29,000 square feet of new construction and 15,500 square feet of converted building space of existing structures into new facilities for Maranatha High School. New construction proposed under the Master Plan would be phased over a 20-year period. The largest single construction project would be the 16,000 square foot new two-story classroom building and is scheduled to take place during phase three, which would not occur for approximately 13 years. The first phase of construction proposes only 4,500 square feet of new construction activity and this is likely to be the only construction which occurs within the first five years. The project predicts only a small amount of, if any, excavation. Site grading is anticipated to balance onsite, with no import or export of fill. No added asphalt will be installed. Rather, the proposed Master Plan envisions the use of concrete or other hard stone surfaces. During construction, emissions would be reduced in accordance with SCAQMD Rule 403 and Rule 1113. Rule 403 requires that best available control measures be utilized to minimize fugitive dust emissions from construction. Such measures often include watering of exposed surfaces, covering/stabilizing of stockpiles, etc. Rule 1113 limits the content of volatile organic compounds (VOCs) in paints and other architectural coatings, thus reducing one of the primary sources of ozone precursors during construction. Given the limited amount of construction activity, the phased nature of the Master Plan, and the required compliance with SCAQMD rules, air pollutants generated during construction will be well below the SCAQMD's thresholds of significance.

The new construction proposed in the Master Plan is required to adhere to green building standards and, as a result, the operational emissions of these new structures would be significantly lower than those of existing buildings. Furthermore, the Master Plan would provide for expanded physical facilities only to accommodate the approved and ongoing use. Given no increase in usage, no contribution from additional vehicle trips, and the best available fugitive dust control measures, the volume of air pollutants attributable to build-out of the proposed Master Plan would be well below the SCAQMD's thresholds of significance.

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?

As shown in Section 5.b, the proposed project will not exceed the SCAQMD's Thresholds for Significance. The SCAQMD established these thresholds in consideration of cumulative air pollution in the SCAB. Thus, projects that do not exceed the SCAQMD's thresholds do not significantly contribute to cumulative air quality impacts. Since the proposed project would not exceed the SCAQMD's thresholds, the project would not result in a cumulatively considerable net increase of any criteria pollutant, and the project would have no related significant impacts.

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

WHY? The proposed project consists of a Master Plan for the southeast quadrant of the former Ambassador College, proposing 29,000 square feet of new construction and 15,500 square feet of converted building space. The Master Plan would govern development at the existing school for a period of 20 years, would not involve the use of toxic pollutants, and would not introduce a new sensitive receptor to toxic pollutants. Construction impacts that could affect students would be scheduled after hours or weekends. It is anticipated

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that most construction activities that would generate emissions would occur during the summer or during non-school hours. The nearest off-campus sensitive receptors are the single family residences to the southwest and west of the school, across Del Mar Avenue approximately 200 feet away. The limited amount of construction and applicable construction and debris management standards (Rule 403) would limit pollutant generation such that project construction would not noticeably affect localized concentrations of air pollution at surrounding properties. Therefore, the proposed project would not cause any significant air quality impacts on any sensitive receptors.

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. There are no known unique, rare or endangered plant or animal species or habitats on or near the site. Nevertheless, to ensure that the various construction phases will not have a detrimental impact on nesting bird populations, the following mitigation measure is recommended for inclusion in the project entitlement.

Mitigation Measure BIO-1: Construction activities that result in grading or in the removal of shrubs or trees shall be conducted during the non-breeding season for birds (approximately September 1 through February 1), to the maximum extent feasible. Portions of project area where construction must take place during the nesting season (February 2 through August 31) shall be grubbed and graded to remove any potential nesting habitat for birds, per the oversight of a qualified ornithologist, prior to February 1. This will avoid violations of the Federal Migratory Bird Treaty Act and California Fish and Game Code Sections 3503, 3503.5 and 3513. Alternatively, if grubbing and grading activities cannot avoid the bird breeding season, the applicant shall retain the services of a qualified ornithologist approved by the City to conduct surveys of the construction zone. The first survey shall occur not more than three days prior to the initiation of clearing and grubbing activities and follow-up surveys shall be conducted weekly thereafter during the breeding season. If the ornithologist detects any occupied nests of native birds within the construction zone, the applicant shall notify the City and conspicuously flag off the area(s) supporting bird nests, providing an adequate buffer zone to protect nest/individuals as determined by the ornithologist (typically a minimum buffer of 300 feet for most species and 500 feet for raptors). The construction crew shall be instructed to avoid any activities in this zone until the bird nest(s) is/are no longer occupied per the written determination of a qualified ornithologist. The project proponent shall record the results of any undertaken protective measures to document compliance with applicable State and Federal laws pertaining to the protection of migratory birds. Upon completion, such recordation shall be provided to the City of Pasadena.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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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 locally designated sensitive natural communities in the City. Natural habitat areas within the City's boundaries are largely limited to the upper and lower portions of the Arroyo Seco, the City's western hillside area, and Eaton Canyon. The project is not located near any of these natural habitat areas.

The project is located within a fully developed, urban area of Pasadena and consists of manicured lawns and a mix of both native and non-native shrubs and trees. The landscape is mature, with a variety of tree species that create a diverse, mature canopy. No natural streams traverse the project site. The project site and surrounding area do not include any vegetation that constitutes a natural or sensitive plant community.

c. Have a substantial adverse effect of federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

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

The project site does not include any discernible 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 proposed project does propose the potential removal of 41

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Less Than Significant Impact
No Impact

trees out of 139 surveyed on the Maranatha campus, 13 of which are protected under the tree protection ordinance. In addition to the sixteen native or specimen trees being removed, six non-protected mature trees are also being removed and shall be replaced at one half the ratio of native or specimen trees. See the table below. Trees that are slated for removal are shaded. Trees that meet the protection criteria are bolded.

In examining the campus for alternative locations for building pads, it should be noted that the Ambassador/Maranatha campus has a significant number of mature trees that qualify for protection under the City Trees and Tree Protection Ordinance. The building pads presented in the Master Development Plan are at locations that have the fewest protected native and specimen trees, and have the least impact on the openness of the park like setting for which the Ambassador/Maranatha campus is well known.

#	Botanic Name	Common Name	Diameter	Height	Spread	Protected	Replacement Trees		
							15-gal.	24"	36"
447	<i>Pinus canariensis</i>	Canary Island Pine	4", 4", 3"	55'	43'				
450	<i>Pinus canariensis</i>	Canary Island Pine	5", 5", 5", 4", 3"	60'	43'				
451	<i>Pinus canariensis</i>	Canary Island Pine	3", 3", 3", 3", 3", 3"	60'	45'				
452	Lagerstoemia indica	Crepe Myrtle	2", 2", 2", 2", 2", 2", 2", 3"	10'	10'	Yes			
453	Pittosporum undalatum	Victorian Box	6", 6", 5", 4", 4", 4"	25'	30'	Yes			
454	<i>Lagerstoemia indica</i>	Crepe Myrtle	4", 4", 3"	10'	10'				
455	<i>Koelreuteria bipinnata</i>	Golden Rain Tree	12"	25'	30'				
456	<i>Koelreuteria bipinnata</i>	Golden Rain Tree	10"	25'	30'				
457	<i>Lagerstoemia indica</i>	Crepe Myrtle	11"	20'	30'				
458	Pittosporum undalatum	Victorian Box	34"	40'	45'	Yes			
459	Pittosporum undalatum	Victorian Box	10", 10"	35'	26'	Yes			
460	Phoenix canariensis	Canary Island Date Palm	27"	50'	30'	Yes			
461	<i>Lagerstoemia indica</i>	Crepe Myrtle	1", 1", 1", 1", 1", 1"	10'	10'				
462	Magnolia gradiflora	Southern Magnolia	17", 10"	45'	48'	Yes			
463	<i>Pittosporum undalatum</i>	Victorian Box	4", 2", 2"	15'	16'				
464	Pittosporum undalatum	Victorian Box	6", 5", 4", 4", 3"	20'	28'	Yes			
465	Pittosporum undalatum	Victorian Box	8", 6", 6", 5", 5", 4", 4"	15'	30'	Yes			
466	Koelreuteria bipinnata	Golden Rain Tree	10"; 11"	35'	40'	Yes		8	4
467	Koelreuteria bipinnata	Golden Rain Tree	18"; 10"	35'	48'	Yes		8	4
468	<i>Washingtonia robusta</i>	Mexican Fan Palm	13"	60'	10'				
469	<i>Washingtonia robusta</i>	Mexican Fan Palm	17"	60'	10'				
470	<i>Washingtonia robusta</i>	Mexican Fan Palm	14"	60'	10'				
471	<i>Washingtonia robusta</i>	Mexican Fan Palm	18"	60'	10'			6	4
472	<i>Washingtonia robusta</i>	Mexican Fan Palm	22"	60'	10'			6	4
473	<i>Washingtonia robusta</i>	Mexican Fan Palm	18"	60'	10'			6	4
474	<i>Washingtonia robusta</i>	Mexican Fan Palm	20"	60'	10'			6	4
475	<i>Callistemon viminalis</i>	Weeping Bottlebrush	9"	35'	23'				
476	<i>Callistemon viminalis</i>	Weeping Bottlebrush	8"	35'	18'				
477	Koelreuteria bipinnata	Golden Rain Tree	36"	45'	58'	Yes		8	4

Potentially Significant Impact
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No Impact

#	Botanic Name	Common Name	Diameter	Height	Spread	Protected	Replacement Trees		
							15-gal.	24"	36"
478	Quercus agrifolia	Coast Live Oak	44"	65'	68'	Yes			
479	Cupaniopsis anacarioides	Carrot Wood	24"	35'	30'			4	2
480	Pittosporum undalatum	Victorian Box	5"3"3"2"2"	10'	10'	Yes	8	4	2
481	Cupaniopsis anacarioides	Carrot Wood	22"	30'	35'			4	2
483	Pittosporum undalatum	Victorian Box	23"	30'	30'	Yes			
484	Pinus canariensis	Canary Island Pine	20"	70'	30'				
485	Pinus canariensis	Canary Island Pine	28"	70'	40'	Yes			
486	Pinus canariensis	Canary Island Pine	24"	45'	23'				
487	Washingtonia robusta	Mexican Fan Palm	25"	50'	20'	Yes			
488	Phoenix canariensis	Canary Island Date Palm	16"	30'	30'				
489	Calocedrus decurrens	Incense Cedar	47"	45'	45'	Yes			
494	Cupaniopsis anacardioides	Carrot Wood	10"	20'	30'				
495	Cupaniopsis anacardioides	Carrot Wood	10"	20'	30'				
496	Eucalyptus cladocalyx	Sugar Gum	38"	65'	45'	Yes		12	8
497	Cupaniopsis anacardioides	Carrot Wood	16"	30'	30'				
498	Cupaniopsis anacardioides	Carrot Wood	17"	30'	33'				
499	Cupaniopsis anacarioides	Carrot Wood	10"	20'	25'				
500	Jacaranda mimisofolia	Jacaranda	15"; 16"	45'	48'	Yes		8	4
501	Ulmus parvifolia	Chinese Elm	25"	45'	45'	Yes			
502	Koelreuteria bipinnata	Golden Rain Tree	26"	45'	50'	Yes			
503	Koelreuteria bipinnata	Golden Rain Tree	25"	45'	50'	Yes			
504	Koelreuteria bipinnata	Golden Rain Tree	25"	45'	50'	Yes			
505	Jacaranda mimisofolia	Jacaranda	7", 8"	40'	30'	Yes			
506	Pinus canariensis	Canary Island Pine	9"	35'	10'				
508	Koelreuteria bipinnata	Golden Rain Tree	19"	45'	43'	Yes			
509	Pinus canariensis	Canary Island Pine	11"	35'	10'				
510	Pinus canariensis	Canary Island Pine	11"	30'	10'				
511	Lagerstoemia indica	Crepe Myrtle	2",2",2",2" 2",2",2",2"	8'	10'	Yes			
512	Jacaranda mimisofolia	Jacaranda	17"	35'	43'	Yes			
519	Pyrus kawakamii	Evergreen Pear	13"	30'	30'				
520	Unidentified Large Shrub		4",3",2",1"						
521	Pyrus kawakamii	Evergreen Pear	14"	35'	33'				
522	Tristania conferta	Brisbane Box	23"	75'	43'	Yes			
523	Phoenix canariensis	Canary Island Date Palm	36"	40'	30'	Yes			
524	Pittosporum undalatum	Victorian Box	6",7",7",10"	35'	30'	Yes			
525	Phoenix canariensis	Canary Island Date Palm	25"	45'	30'	Yes			
526	Cinnamomum camphora	Camphor Tree	27"	35'	58'	Yes			
527	Pinus canariensis	Canary Island Pine	28"	65'	43'	Yes			
528	Jacaranda mimisofolia	Jacaranda	12"	35'	35'	Yes			

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No Impact

#	Botanic Name	Common Name	Diameter	Height	Spread	Protected	Replacement Trees		
							15-gal.	24"	36"
529	Jacaranda mimisofolia	Jacaranda	12"; 10"	35'	43'	Yes			
530	Jacaranda mimisofolia	Jacaranda	10"	35'	23'				
531	Jacaranda mimisofolia	Jacaranda	14"	40'	30'	Yes	8	4	2
532	Jacaranda mimisofolia	Jacaranda	8"	30'	23'				
533	Jacaranda mimisofolia	Jacaranda	12"	30'	35'	Yes	4	2	
534	Jacaranda mimisofolia	Jacaranda	12"; 11"	35'	50'	Yes		8	4
535	Jacaranda mimisofolia	Jacaranda	6"; 10"	35'	35'	Yes	8	4	2
536	Jacaranda mimisofolia	Jacaranda	8"; 10"	35'	33'	Yes	8	4	2
537	Jacaranda mimisofolia	Jacaranda	12"	40'	43'	Yes	4	2	
538	Jacaranda mimisofolia	Jacaranda	10"; 8"	35'	45'	Yes			
539	Jacaranda mimisofolia	Jacaranda	10"; 9"	35'	43'	Yes			
540	Jacaranda mimisofolia	Jacaranda	12"	40'	40'	Yes			
541	Jacaranda mimisofolia	Jacaranda	10"	30'	30'				
542	Jacaranda mimisofolia	Jacaranda	10"	35'	38'				
549	Pittosporum undalatum	Victorian Box	3",3",4",2"	10'	20'	Yes			
550	Pyrus kawakamii	Evergreen Pear	6"	10'	10'				
552	Pyrus kawakamii	Evergreen Pear	7"	15'	18'				
553	Pyrus kawakamii	Evergreen Pear	7"	20'	20'				
554	Pinus canariensis	Canary Island Pine	11"	30'	10'				
555	Pinus canariensis	Canary Island Pine	11"	35'	10'				
556	Pinus canariensis	Canary Island Pine	10"	25'	10'				
557	Pinus canariensis	Canary Island Pine	10"	35'	20'				
558	Pinus canariensis	Canary Island Pine	9"	35'	10'				
559	Pinus canariensis	Canary Island Pine	11"	30'	10'				
560	Pinus canariensis	Canary Island Pine	22"	55'	23'				
561	Pinus canariensis	Canary Island Pine	20"	60'	30'				
562	Pinus canariensis	Canary Island Pine	14"	35'	20'				
563	Pinus canariensis	Canary Island Pine	13"	35'	10'				
564	Pinus canariensis	Canary Island Pine	11"	20'	10'				
565	Pinus canariensis	Canary Island Pine	12"	30'	10'				
566	Pinus canariensis	Canary Island Pine	11"	35'	10'				
567	Pinus canariensis	Canary Island Pine	12"	35'	20'				
568	Pinus canariensis	Canary Island Pine	11"	30'	10'				
569	Pinus canariensis	Canary Island Pine	25"	70'	28'	Yes			
570	Pinus canariensis	Canary Island Pine	14"	70'	20'				
571	Pinus canariensis	Canary Island Pine	18"	70'	20'				
572	Pinus canariensis	Canary Island Pine	27"	70'	20'	Yes			
574	Pinus canariensis	Canary Island Pine	22"	70'	28'				
575	Pinus canariensis	Canary Island Pine	20"	70'	23'				
576	Pinus canariensis	Canary Island Pine	19"	70'	20'				
577	Pinus canariensis	Canary Island Pine	29"	70'	25'	Yes			

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Less Than Significant Impact
No Impact

#	Botanic Name	Common Name	Diameter	Height	Spread	Protected	Replacement Trees		
							15-gal.	24"	36"
578	Pinus canariensis	Canary Island Pine	25"	65'	20'	Yes			
579	Pinus canariensis	Canary Island Pine	23"	70'	30'				
580	Pinus canariensis	Canary Island Pine	21"	70'	25'				
581	Pinus canariensis	Canary Island Pine	27"	70'	28'				
582	Pinus canariensis	Canary Island Pine	22"	70'	30'				
583	Pinus canariensis	Canary Island Pine	27"	70'	38'	Yes			
584	Pinus canariensis	Canary Island Pine	29"	70'	30'	Yes			
585	Pinus canariensis	Canary Island Pine	24"	65'	30'				
586	Pinus canariensis	Canary Island Pine	12"	25'	10'				
596	Pinus canariensis	Canary Island Pine	12"	60'	23'				
597	Pinus canariensis	Canary Island Pine	14"	65'	20'				
598	Pinus canariensis	Canary Island Pine	14"	60'	30'				
599	Pinus canariensis	Canary Island Pine	18"	55'	30'		4	2	1
600	Pinus canariensis	Canary Island Pine	34"	75'	38'	Yes		8	4
601	Pinus canariensis	Canary Island Pine	24"	70'	33'				
602	Pinus canariensis	Canary Island Pine	18"	70'	23'		4	2	1
608	Pittosporum undalatum	Victorian Box	4",4",3",2"	15'	20'	Yes			
609	Pittosporum undalatum	Victorian Box	5",5",4"	15'	20'	Yes			
610	Pittosporum undalatum	Victorian Box	11",10",9",3"	15'	25'	Yes			
611	Pittosporum undalatum	Victorian Box	8",9",5"	15'	30'	Yes			
612	Pittosporum undalatum	Victorian Box	6",4",2"	15'	20'	Yes			
613	Pittosporum undalatum	Victorian Box	3"	12'	10'				
614	Pittosporum undalatum	Victorian Box	7",5",4"	15'	23'	Yes			
617	Pittosporum undalatum	Victorian Box	5",6",5"	15'	25'	Yes			
618	Pittosporum undalatum	Victorian Box	3",6",7",9"	15'	28'	Yes			
619	Pittosporum undalatum	Victorian Box	7",7",6" 5",5"	20'	30'	Yes			
620	Pittosporum undalatum	Victorian Box	6",5",3"	15'	20'	Yes			
911	Jacaranda mimisofolia	Jacaranda	13"	45'	33'	Yes			
914	Jacaranda mimisofolia	Jacaranda	10"	35'	25'				
917	Jacaranda mimisofolia	Jacaranda	13"	50'	45'	Yes			

The tree protection ordinance requires replacement of protected trees and non-protected trees over 18 inches diameter at breast height (dbh) at a prescribed ratio. A preliminary analysis has determined that there is sufficient land area on the campus to accommodate the required replacement trees. The tree survey notes protected trees in bold type, trees proposed for removal (shaded) and the replacement ratio specified by ordinance. A condition of the Master Development Plan will require the applicant to submit final landscape plans for review and approval by the Planning Director. Compliance with the tree protection ordinance will be monitored through the approved landscape plan depicting replacement trees during the design review phase of the Master Development Plan implementation. The project is in compliance with the Tree Protection Ordinance; therefore impacts related to tree removal will be less than significant.

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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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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? One building within the Master Plan area has been identified as an eligible historic resource, the Student Center, originally the Dining Hall for Ambassador College Campus. It was built in 1965, the work of the architectural firm Daniel, Mann, Johnson and Mendenhall (DMJM). It was included within the Master Development Plan for the campus that DMJM prepared in 1963. The Student Center (Dining Hall) represents a key component of the larger planned campus area. It, along with the Hall of Administration and eventually Ambassador Auditorium, constituted a single complex, visually and spatially linked to its neighbors through the cross-axial elevated bridges that span the reflecting pool surrounding the Auditorium.

In 2007, with aid from the State of California's Certified Local Government program, the City of Pasadena, along with consultant Historic Resources Group, prepared an Historic Context Report "Cultural Resources of the Recent Past", which was developed "to establish a context to evaluate the significance of a type of historic resource in Pasadena about which no comprehensive body of research has previously been completed: buildings constructed between 1935 and 1965." The report provides, as the name implies, a new context, within which to evaluate the significance of the Student Center (Ambassador Dining Hall) and other residential and nonresidential structures built within that period of time. An historic context statement analyzes the historical development of a community according to guidelines written by the National Park Service and specified in National Register Bulletin #16. It contains information about historical trends and properties organized by important themes during a particular period of time. An historic context statement is linked with tangible built resources through the concept of property type: a grouping of individual properties based on shared physical or associative characteristics. The physical structure and its relationship to an historic context provide a framework for understanding the potential significance of a property.

Along with providing information about themes and property types, the historic context report also creates a definitive set of registration requirements. The National Register, the California Register, and the City of Pasadena's local ordinance are all based on four evaluation criteria for determining why a property is considered historic. It can have an association with an important event, an important person, be architecturally distinctive, or yield important archeological information. For a property to be designated at either the local, state, or national level, it must be rooted in one or more of these evaluation criteria. Only if a property can meet at least one of the aforementioned criteria, can it be considered eligible for designation.

The final concept that is relevant in determining whether a resource is eligible for designation is the concept of integrity. Integrity is the ability of a property to convey its significance. To be listed in the National Register, the California Register or locally, a property must not only be shown to be significant under one of the four evaluation criteria, but it also must have integrity. Historic properties either retain integrity (this is, convey their significance) or they do not. Within the concept of integrity, the National Register criterion recognizes seven

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aspects or qualities that, in various combinations, define integrity. These qualities are: Feeling, Association, Design, Material, Workmanship, Setting, and Location. To retain historic integrity a property will always possess several, and usually most, of the aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance.

Based on the Context Report, the Student Center can be identified within the theme of Corporate/Institutional/Industrial Development. Large scale corporate, institutional and industrial buildings are included under the same theme because they all represent similar developments from the period. Although diverse in their uses, these building all share the same form and scale, and similar design philosophies. The Student Center and the rest of the buildings that were constructed for the Ambassador Campus are institutional buildings. Further, the report specifies a particular building subtype, the Large Institutional Building Subtype, and it describes the nature of construction related to this subtype:

“The large-scale civic, institutional and industrial building includes performing arts and convention centers, governmental buildings, college campus buildings, and industrial buildings. These structures are often occupied by a single entity, such as a public agency, private manufacturer, or university department. When these structures are situated within a larger campus setting, pedestrian engagement with the building is dictated by the campus plan, and associated parking may be segregated. The site may also incorporate designed landscaping. In Pasadena, this property subtype is most often associated with the Corporate Modern, Vernacular Modern, New Formalist and Brutalist styles.”

The Student Center (Dining Hall) conforms specifically to the description of the property subtype, as a college campus building that was occupied by a single entity, and consciously sited and oriented to bear a relationship to the greater campus, to pedestrian circulation, and to open space and landscaping concerns.

Architecturally, the Student Center (Dining Hall) is designed and built in the style that has come to be termed, New Formalist. It is an architectural trend which began in the late 1950’s and was popular until the 1970’s. As a movement, it was rooted in opposition to the minimalist and austere approach of the International Style, and expressed itself through classic forms and applied ornamentation. “Formalism” in contemporary architecture was identified in 1960 by architectural historian William Jordy as a representation that drew upon the classical tradition in architecture, though its elements were reinterpreted through the contemporary “language” of the machine aesthetic of the International Style. Formalism was an effort to wed the building forms of the past with new forms enabled by advances in building technology. New Formalist buildings embraced many Classical precedents such as building proportion and scale, classical columns, highly stylized entablatures, and colonnades. They also used the newly discovered plastic-like qualities of concrete to create new forms such as umbrella shells, waffle slabs and folded plates. Buildings designed in this style have a carefully organized hierarchy of space, and an emphasis is placed on the structural grid of the building. A single volume structure is preferred, and the buildings are often separated from nature by being set on a raised podium or base. Many have an exotic flavor and exterior wall surfaces of cast stone, brick and marble. New Formalist civic buildings are designed on a larger urban scale and achieve a monumental presence by emphasizing symmetry and the axis or orientation of the building.

The Student Center (Dining Hall) is a two story structure that is square in plan. The exterior walls are constructed of reinforced, poured-in-place concrete, with portions of the exterior clad in horizontally emphasized red brick. Each of the facades is divided into five shallow arching bays, the three central bays are glazed; glass panels held within extruded aluminum frames. A series of precast columns support a cantilevered roof referencing the classical temple of antiquity. A passenger elevator was installed in 1983, and a dumbwaiter is original to the building. A handicap-accessibility ramp was added in 1981. A two-story addition on the east side of the Student Center was also completed in 1983. These additions have not substantially degraded the building’s integrity.

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This building was last surveyed in 1996. At that time, the building was only 31 years old, significantly below the threshold for designating historic resources recommended by the National Register of 50 years. Presently, the building is 48 years old, and this is the first time since the initial evaluation that the building has been considered for historic preservation. Based on the creation of the new historic context, and an analysis of the buildings current condition, it appears that the building would meet local designation criteria as an individual landmark, with an NRHP Status Code of 5S3. This analysis and conclusion does not result in a designation of the property, it merely identifies the structure as an eligible historic resource. The Historic Preservation Ordinance does apply to eligible buildings, and potentially adverse impacts to an eligible resource would require review by staff or by the Design Commission.

The 4,500 square foot administration building (Building "B") that is proposed in the master plan scope of work would be physically separate from the Student Center and located to the east. The location of the building pad does not visually interfere with the formal setting in front of the Ambassador auditorium. The new building would not affect any of the other aspects of the Student Center's integrity, and the design study has already begun to contemplate the design and materials that will need to be employed in the new construction of Building "B" to ensure that the new construction complies with the Secretary of the Interiors Standards for Rehabilitation and the Treatment of Historic Properties. Therefore, with compliance with the design guidelines as required by Mitigation Measure CR-1, construction of the new administrative building would not create a significant adverse impact on the eligible historic resource.

The proposed location of the new perimeter fence will not have an adverse impact on the formal setting in front of the Student Center (north-facing elevation). As stated above the Student Center cannot be considered alone. It is an integral piece of a carefully orchestrated and implemented master plan. The Ambassador Auditorium was the central and key component of this complex which, along with the Hall of Administration, and the Student Center, was the physical and symbolic center of the Ambassador campus. The design of each building reflects the classical tradition of architecture and they are visually and spatially linked to their neighbors through the cross-axial elevated bridges that span the reflecting pool. The intervening space between the structures was intended to be freely traversable. It will remain so.

The new bleachers, weight room and offices would be attached to, and built along the south end of the parking garage, a non-historical, non-architecturally significant structure. The new 16,000 square foot classroom building would be located at the far south end of the property between Del Mar Boulevard and the existing gymnasium. This structure would be a separate structure from buildings at the south end of campus. No historic garden areas would be demolished, relocated, removed, or significantly altered to accommodate the building pads for new construction. 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 significant impacts.

As required by Section 17.61.030 of the Zoning Code, the design of this project for buildings up to 25,000 square feet will be reviewed for approval by the Director of Planning. This regulatory procedure was established to ensure that the design, colors, and finish materials of new development comply with adopted design guidelines and achieve compatibility with the surrounding area. In the case of new construction that may have an adverse impact on an historic resource, the regulatory procedure also ensures that any new construction, addition, or alteration of the eligible resource comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The new Administration building proposed next to the Student Center would be subject to these review procedures, and as part of the design review, staff is qualified to apply historic preservation principles and standards to ensure that the new construction does not create an adverse impact on the eligible resource. Staff level approvals may be appealed to the Design Commission.

Mitigation Measure CRS - 1: To the satisfaction of the City of Pasadena's Design and Historic Preservation Staff, future onsite buildings resulting from the subject Master Plan shall be in compliance with the guidelines set forth in the *Master Plan Design Study that Includes Design Guidelines for the Future*

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Development of Maranatha High School, Onyx Architects, December 2013. The City's review for compliance with this measure shall occur prior to the issuance of a building permit and as part of the City's Design Review Process established by the thresholds contained within the West Gateway Specific Plan.

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

WHY? There are no known prehistoric or historic archeological sites on the project site. In addition, the project site does not contain undisturbed surficial soils. The site was formerly comprised of a neighborhood of single-family residences before the properties were assembled to form the Ambassador College campus in the 1940s. The property was later redeveloped with associated university structures and facilities in the 1960s. If archaeological resources once existed on-site, it is likely that previous grading, construction, and modern use of the site have either removed or destroyed them. Staff relied on the conclusions of other environmental analyses conducted for project areas that were adjacent to, or included the Maranatha High School campus. The first source is the West Gateway Specific Plan Final Environmental Impact Report (1998). The Maranatha High School campus is within the study area. The report finds that there are neither archeological nor paleontological resources in the City of Pasadena. The Ambassador Campus Development Plan Final Supplemental EIR referenced the paleontological findings in the WGSP FEIR and also conducted a records search in 2000. The Maranatha campus is within this study area, and the search did not identify any pre-historic or historic archeological resources on or within a one-quarter mile radius of the site. The records search also found that given the site's low sensitivity for such resources, further survey was not necessary. Another search was conducted as part of the Ambassador West Final EIR (adjacent to Maranatha) which also found no evidence of archeological resources. 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.

Mitigation Measure CRS – 2: If archaeological resources are encountered during project construction, all construction activities in the vicinity of the find shall halt until an archeologist certified by the Society of Professional Archeologists examines the site, identifies the archaeological significance of the find, and recommends a course of action. Construction shall not resume until the site archeologist states in writing that the proposed construction activities will not significantly damage archaeological resources.

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

WHY? The project site lies on the valley floor in an urbanized portion of the City of Pasadena. This portion of the City does not contain any unique geologic features and is not known or expected to contain paleontological resources. Staff relied on the conclusions of other environmental analyses conducted for project areas that were adjacent to, or included the Maranatha High School campus. The first source is the West Gateway Specific Plan Final Environmental Impact Report (1998). The Maranatha High School campus is within the study area. The report finds that there are neither archeological nor paleontological resources in the City of Pasadena. The Ambassador Campus Development Plan Final Supplemental EIR referenced the

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paleontological findings in the WGSP FEIR and also conducted a records search in 2000. The Maranatha campus is within this study area, and the search did not identify any pre-historic or historic archeological resources on or within a one-quarter mile radius of the site. The records search also found that given the site's low sensitivity for such resources, further survey was not necessary. Another search was conducted as part of the Ambassador West Final EIR (adjacent to Maranatha) which also found no evidence of archeological resources. Therefore, the proposed project would not destroy a unique paleontological resource or unique geologic feature, and would have no related impacts.

Mitigation Measure CRS – 3: If paleontological resources are encountered during project construction, all construction activities in the vicinity of the find shall halt until a paleontologist meeting the satisfaction of the Natural History Museum of Los Angeles County identifies the paleontological significance of the find, and recommends a course of action. Construction shall not resume until the site paleontologist states in writing that the proposed construction activities will not significantly damage paleontological resources.

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

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

8. ENERGY. Would the proposal:

a. Conflict with adopted energy conservation plans?

WHY? The project does not conflict with the Open Space and Conservation 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 is required 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 standard rated insulation and double-glazed windows. Compliance with the Calgreen Building Code is a statutory requirement to receive a building permit for construction.

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 would result in a short-term insignificant

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

(Energy). The long-term impact from increased energy use by this project is not significant in relationship to the number of customers currently served by the electrical and gas utility companies. Supplies are available from existing mains, lines and substations in the area. Occupation of the project would result in an insignificant increase in the consumption of natural gas. This consumption would be lessened by adherence to the performance standards of California Energy Code, Part 6 of the California Building Standards Code Title 24. This project's consumption would be reduced to an insignificant level by meeting the above referenced energy standards. Measures to meet these performance standards may include high efficiency Heating Ventilation and Air Conditioning (HVAC) and hot water storage tank equipment, lighting conservation features, higher than standard rated insulation and double-glazed windows. The energy conservation measures are required to be prepared by the developer and shown on a building plan(s). This plan must be submitted to the Water and Power Department and Building Official for review and approval prior to the issuance of a building permit.

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

(Water) This project would result in a minor increase in water consumption, which the Water Department has verified they can serve. During drought periods, the water consumption by the applicant would be reduced by adhering to the Comprehensive Water Conservation Plan and the Water Shortage Procedure 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.

Over the past several years, Pasadena Water and Power (PWP) has been impacted by several factors that have restricted local and regional water supply. PWP's groundwater rights in the Raymond Basin have been curtailed in order to mitigate groundwater depletion experienced over the last half century. With respect to imported supplies, a decade-long drought has reduced the ability to replenish regional groundwater supplies; drought conditions in the American southwest have reduced deliveries of water from the Colorado River, and legal and environmental issues have resulted in reduced water deliveries through the State Water Project. As a result, the Metropolitan Water District (MWD) has implemented its Water Supply Allocation Plan, which requires PWP to reduce its total water consumption by approximately 10% effective July 1, 2009. MWD will charge significant penalties if PWP's total water use exceeds this allocation.

In September 2008, Council directed PWP to develop a Comprehensive Water Conservation Plan (CWCP) with a variety of approaches and recommendations for achieving 10%, 20% and 30% reductions in water consumption as well as an analysis of the financial impacts on the Water Fund if those conservation targets were achieved. On April 13, 2009, Council voted to approve the CWCP presented by PWP and to replace the Water Shortage Procedure Ordinance with a new Water Waste Prohibition and Water Shortage Plan Ordinance (PMC 13.10). As a long term goal, the CWCP presupposes an initial target of reducing per-capita potable water consumption 10% by 2015 and 20% by 2020.

The new Water Waste Prohibitions and Water Supply Shortage Plan Ordinance (PMC 13.10) became effective on July 4, 2009 and established thirteen permanent mandatory restrictions on wasteful water use activities. In addition, statewide water demand reduction requirements began in 2009, as a result of the Governor's 20x2020 Water Conservation Plan from April 30, 2009 ("20x2020"), and the current work being done by the California Department of Water Resources, the State Water Resources Control Board, and other state agencies to implement the Governor's 20x2020 Water Conservation Initiative Program.

As a result, to meet these water policy goals, the current project must comply with the Water Conservation Plan and the Water Shortage Procedure Ordinance and the City's goal to meet the 20x2020 goals by

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submitting a water-conservation plan limiting the water consumption to 80% of its originally anticipated amount. With submission of this plan, the project would not have any individual or cumulative impacts on water supply. This plan is subject to review and approval by the City's Water and Power Department and the Building Division before the issuance of a building permit. The applicant's irrigation and plumbing plans are also required to comply with the approved water-conservation plan and the city's requirements for landscape irrigation.

The project is also required to adhere to the requirements of the Water Efficient Landscape Ordinance which was adopted in 2010. This ordinance is a result of State Assembly Bill 1881 (SB1881) which mandates that all local jurisdictions follow specific regulations for the efficient use of water in the irrigation of landscapes. The project must adhere to all applicable provisions on this ordinance which are contained in Title 13 (Utilities and Services) of the Pasadena Municipal Code. The ordinance may require design features that include specific plant types, the use of recycled water for irrigation and/or water features etc. Adherence to the requirements will reduce the amount of water used in the project landscaping and will aid the project in complying with all related water reduction provisions.

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 hazards in Southern California. This fault is located approximately 21 miles north of Pasadena.

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

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

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

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The project site is not within any of these potential fault rupture zones. The proposed project is 4 miles south of the Sierra Madre Fault, 2 miles south of a potentially active strand of the Sierra Madre Fault, 1.5 miles north of the Raymond Fault and 1 mile northeast of the Eagle Rock Fault. Therefore, the proposed project would not expose people or structures to potential substantial adverse effects caused by the rupture of a known fault. No related significant impacts would result from the proposed project.

ii. *Strong seismic ground shaking?*

WHY? See 9.a.i.

Since the City of Pasadena is within a larger area traversed by active fault systems, such as the San Andreas and Newport-Inglewood Faults, any major earthquake along these systems will cause seismic ground shaking in Pasadena. Much of the City is on sandy, stony or gravelly loam formed on the alluvial fan adjacent to the San Gabriel Mountains. This soil is more porous and loosely compacted than bedrock, and thus subject to greater impacts from seismic ground shaking than bedrock.

The risk of earthquake damage is minimized because new structures must 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? According to the State of California Seismic Hazard map (Pasadena, Mt. Wilson or Los Angeles Quadrangle official maps released 3.25.99) the project site is not in an area subject to either liquefaction or earthquake-induced landslides. Further, the 2002 adopted Safety Element of the General Plan Plate 1-3 does not show the project site to be located in an area subject to either liquefaction or earthquake-induced landslides. Therefore, the project would not result in significant impacts due to 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 the State of California Seismic Hazard Zone Map dated April 1975, and the Seismic Hazards Map (Plate 1-3) and Slope Instability Map (Plate 2-4 of the adopted 2002 Safety Element of the General Plan) the project is located where slopes have low 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 there will be no related significant impact. In addition the Seismic Hazard map does not show this project to be located in an area where there is geologic evidence of past landslides.

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

WHY? The proposed project consists of a Master Plan for the southeast quadrant of the former Ambassador College, proposing 29,500 square feet of new construction and 15,500 square feet of converted existing building space into new facilities for Maranatha High School. The new structures would be built at grade. 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 Chapter 33 of the 2001 California Building Code relating to grading and excavation 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. 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.

In accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES), 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 must be controlled by implementation of an approved landscape and irrigation plan. This plan is required to be submitted to the Planning Director (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 other best available control technologies, as required by SCAQMD Rule 403.

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

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

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

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

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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 is underlain by alluvial material from the San Gabriel Mountains. This soil consists primarily of sand and gravel and is in the low to moderate range for expansion potential. Compliance with the California Building Code will ensure that the project would not result in significant impacts related to expansive soils.

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. GREENHOUSE GAS EMISSIONS. Would the project:

a. *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

WHY? In response to growing scientific and political concern with global climate change, California has recently adopted a series of laws to reduce emissions of greenhouse gases (GHGs) into the atmosphere from activities within the State. In September 2006, a bill became effective known as the California Global Warming Solutions Act of 2006, also known as AB 32. AB 32 focuses on reducing GHG emissions in California, and requires the California Air Resources Board (CARB), the State agency charged with regulating statewide air quality, to adopt rules and regulations that would achieve greenhouse gas emissions equivalent to statewide levels in 1990 by 2020. To achieve this goal, AB32 mandates that the CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. Because the intent of AB 32 is to limit 2020 emissions to the equivalent of 1990 levels, and the present year is near the midpoint of this timeframe, it is expected that the regulations would affect many existing sources of greenhouse and not just new general development projects. Senate Bill (SB) 1368, a companion bill to AB 32, requires the California Public Utilities Commission and CEC to establish GHG emission performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the State.

Generally, an individual project cannot generate enough greenhouse gas emissions to influence global climate change because it is the increased accumulation of greenhouse gases which may result in global climate change. However, an individual project may contribute an incremental amount of GHG emissions that could combine with other emission sources across the globe to influence climate change. For most projects, the main contribution of GHG emissions is from motor vehicles. In addition, GHG emissions are generated from

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natural gas use, standard electricity use, and electricity use associated with the movement and consumption of potable water. In this case, the proposed Master Plan does not include a change to the allowed enrollment and faculty capacity of the school. Thus, the Master Plan would not induce any new vehicle trips or their resulting GHG emission. In addition, as a result of the City's implementation of the CalGreen Building Code, the energy consumption of new buildings developed under the proposed Master Plan would be less than the energy consumption of current buildings. Given the required compliance with the City's green building code requirements and the no net increase in entitled enrollment, the project would not cause a significant impact related to greenhouse gas emissions.

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

WHY? As discussed above, the proposed project is required to meet the standards mandated by the CalGreen Building Code. Designing the building to CalGreen Standards would reduce GHG emissions through various energy conservation tactics. Furthermore, the project will not conflict with AB 32 and the ARB Scoping Plan, and will not conflict with the ARB Early Action Strategies.

11. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

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

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

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

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

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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WHY? The project does not involve hazardous emissions or the handling of hazardous materials, substance, or waste. Therefore, the proposed project would have no hazardous material related impacts to schools.

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

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 was formerly used as a university, which is not a land use associated with hazardous materials. The site is not known or anticipated to have been contaminated with hazardous materials and no hazardous material storage facilities are known to exist onsite.

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

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

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

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

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

WHY? The 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.

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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?*

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.

12. HYDROLOGY AND WATER QUALITY. Would the project:

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

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

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

Compliance with the SQMP is ensured by Section 402 of the Clean Water Act, which is known as the National Pollution Discharge Elimination System (NPDES). Under this section, municipalities are required to obtain permits for the water pollution generated by stormwater in their jurisdiction. These permits are known as Municipal Separate Storm Sewer Systems (MS4) permits. Los Angeles County and 85 incorporated Cities therein, including the City of Pasadena, obtained an MS4 (Permit # 01-182) from the Los Angeles RWQCB in 2001, as amended in 2007. 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.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The proposed project consists of a Master Plan for the southeast quadrant of the former Ambassador College, proposing a maximum build-out of 29,000 square feet of new construction and 15,500 square feet of converted building for Maranatha High School. New construction proposed under the Master Development Plan is anticipated to be phased over a 20-year period, although if funded could occur concurrently. The largest single construction project would be the 16,000 square foot new two-story classroom building. None of the proposed uses are point source generators of water pollutants, and thus, no quantifiable water quality standards apply to the project. As an urban development, the proposed project would add typical, urban, non-point-source pollutants to storm water runoff.

The proposed project is required to comply with the Countywide MS4 Permit (Permit # 01-182), as implemented by City ordinance. In accordance with this permit, construction of the proposed project must control potential pollutant sources at the construction site by, at a minimum, complying with the following standard requirements:

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.

Compliance with these requirements, 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 would use the existing water supply system provided by the Pasadena Department of Water and Power (PWP). The source of some of this water supply is ground water, stored in the Raymond Basin. Thus, the project could contribute to PWP's withdraw groundwater. However, that amount of water that PWP withdraws from the Basin would not be affected by the project, as it is regulated by the Raymond Basin Watermaster. Thus, the project's water use would not result in significant impacts from depletion of groundwater supplies. Under normal operation the project would use approximately 4,450 gallons of water per day. Per the City's Water and Power Department, existing entitlements and sources can serve the proposed project.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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As noted in response 8 b, over the past several years, Pasadena Water and Power (PWP) has been impacted by several factors that have restricted local and regional water supply. PWP's groundwater rights in the Raymond Basin have been curtailed in order to mitigate groundwater depletion experienced over the last half century. With respect to imported supplies, a decade-long drought has reduced the ability to replenish regional groundwater supplies; drought conditions in the American southwest have reduced deliveries of water from the Colorado River, and legal and environmental issues have resulted in reduced water deliveries through the State Water Project. As a result, the Metropolitan Water District (MWD) has implemented its Water Supply Allocation Plan, which requires PWP to reduce its total water consumption by approximately 10% effective July 1, 2009. MWD will charge significant penalties if PWP's total water use exceeds this allocation.

In September 2008, Council directed PWP to develop a Comprehensive Water Conservation Plan (CWCP) with a variety of approaches and recommendations for achieving 10%, 20% and 30% reductions in water consumption as well as an analysis of the financial impacts on the Water Fund if those conservation targets were achieved. On April 13, 2009, Council voted to approve the CWCP presented by PWP and to replace the Water Shortage Procedure Ordinance with a new Water Waste Prohibition and Water Shortage Plan Ordinance (PMC 13.10). As a long term goal, the CWCP presupposes an initial target of reducing per-capita potable water consumption 10% by 2015 and 20% by 2020.

The new Water Waste Prohibitions and Water Supply Shortage Plan Ordinance (PMC 13.10) became effective on July 4, 2009 and established thirteen permanent mandatory restrictions on wasteful water use activities. In addition, statewide water demand reduction requirements began in 2009, as a result of Governor Arnold Schwarzenegger's 20x2020 Water Conservation Plan from April 30, 2009 ("20x2020"), and the current work being done by the California Department of Water Resources, the State Water Resources Control Board, and other state agencies to implement the Governor's 20x2020 Water Conservation Initiative Program.

As a result, to meet these water policy goals, the current project must comply with the Water Conservation Plan and the Water Shortage Procedure Ordinance and the City's goal to meet the 20x2020 goals by submitting a water-conservation plan limiting the water consumption to 80% of its originally anticipated amount. With submission of this plan, the project will not have any individual or cumulative impacts on water supply. This plan is subject to review and approval by the City's Water and Power Department and the Building Division before the issuance of a building permit. The applicant's irrigation and plumbing plans are also required to comply with the approved water-conservation plan and the city's requirements for landscape irrigation.

The project is also required to adhere to the requirements of the Water Efficient Landscape Ordinance which was adopted in 2010. This ordinance is a result of State Assembly Bill 1881 (SB1881) which mandates that all local jurisdictions follow specific regulations for the efficient use of water in the irrigation of landscapes. The project must adhere to all applicable provisions on this ordinance which are contained in Title 13 (Utilities and Services) of the Pasadena Municipal Code. The ordinance may require design features that include specific plant types, the use of recycled water for irrigation and/or water features etc. Adherence to the requirements will reduce the amount of water used in the project landscaping and will aid the project in complying with all related water reduction provisions.

- 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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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WHY? The project site is currently virtually flat, and runoff onsite drains as sheet flow from north to south. The project site does not contain any discernible 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 erosion or siltation impacts from 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 discernible 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.

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 12.c) and 12.d), compliance with the City's SUSMP ordinance would ensure that post-development peak storm water runoff rates do 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 12.a) and 12.c), the project would generate only typical, non-point source, urban stormwater pollutants. These pollutants are covered by the County-wide MS4 permit, and the project, through the City's SUSMP ordinance, is required to implement BMPs to reduce stormwater pollutants to the maximum extent practicable. Therefore, the proposed project would not create runoff that would exceed the capacity of the storm drain system and would not provide a substantial additional source of polluted runoff.

- f. *Otherwise substantially degrade water quality?*

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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WHY? As discussed above, the proposed development would 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 BMP’s to reduce the potential for construction-induced water pollutant impacts. These BMP’s 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:

- Sediments generated on the project site shall be retained using adequate Treatment Control or Structural BMP’s;
- 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;
- Non-storm water runoff from equipment and vehicle washing and any other activity shall be contained at the project site; and
- 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 consists of a Master Plan for the southeast quadrant of the former Ambassador College, proposing 29,000 square feet of new construction and 15,500 square feet of converted building space for Maranatha High School. New construction proposed under the Master Plan would be phased over a 20-year period. There are no new housing units proposed. 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? See response (g) above. 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, most of the City is in Zone X with some scattered areas in Zone D, for which no floodplain management regulations are required. Therefore, the proposed project would not place structures within the flow of the 100-year flood, and the project would have no related impacts.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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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, most of the City is in Zone X with some scattered areas 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.

13. LAND USE AND PLANNING. Would the project:

a. *Physically divide an existing community?*

WHY? The project will not physically divide an existing community. The site is an existing educational facility surrounded by similarly scaled development. The project scope consists of infill development within this highly urbanized area. The project site would continue to function as a high school and prior to Maranatha's occupation, the campus was utilized as a university. The location of new construction would not change the vehicular or pedestrian circulation patterns in the surrounding area. The proposed perimeter campus fencing would maintain general access to the campus' Great Lawn from Del Mar Boulevard during normal operational hours (7:00 am to sunset).

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 project site has a general plan designation of Specific Plan, which directly references all development and use standards in the West Gateway Specific Plan. The project site is zoned West Gateway Specific Plan Area Sub-district 1-A. Among the purposes of the West Gateway Specific Plan are the statements: "Balance the principles of economic development, historic preservation, and maintenance of local community culture" as well as "Preserve the high-quality atmosphere that is the hallmark of this area, through complementary, well-designed landscaping and buildings appropriately scaled to blend with the character of

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Less Than Significant Impact
No Impact

the adjacent areas.” The Maranatha Master Plan is a project that is in alignment with the purposes of the West Gateway Specific Plan and with the objectives and policies within the general plan land use element.

The project is located in the West Gateway Specific Plan area. The development strategy for this area is to allow a variety of future uses on the site, while retaining the low density character and high quality buildings and landscaping on Orange Grove and Del Mar Boulevard frontages. The conversion in use from college to high school has allowed for adaptive reuse of many of the existing structures on campus while preserving the architectural and natural character of the campus. As part of the Master plan, the applicant has undertaken design and compatibility studies to ensure that proposed development is similar in scale and massing to existing development. New construction is proposed to be consistent with the height, setbacks, and allowable square footage defined in the West Gateway Specific Plan. Maranatha High School has operated at the project site since approval of Conditional Use Permit #4367 in 2005. The increase in enrollment from the current level analyzed within this document has been previously analyzed and approved as part of the modification to CUP #4367 approved in 2008. The current project would provide for expanded physical facilities only to accommodate the approved and ongoing use.

The West Gateway Specific Plan allows for an additional 250,000 square feet of institutional square feet to be built in the plan area. Maranatha received 125,341 square feet of development rights upon acquisition of the property. The school sold 107,841 square feet of development rights to Sunrise Senior Living, one of the development partners in the redevelopment of the former college campus. The school retains 17,500 square feet of development rights. To build out the Master Development Plan as envisioned (29,000 gross square feet), the school needs 11,500 square feet of additional development rights. There exists (within the other former campus properties) potential for the Maranatha to purchase development rights to build out the Master Development Plan as envisioned. Potential donor sites within the former campus are detailed below:

Name	Use	Allocation	Transferred SF	Remaining SF
Terrace Villa Grove	Single-Family	5,720	4,333	1,387
Walk/Stream	Open Space	13,489	4,919	8,570
Ambassador Auditorium	Institutional	50,322	0	50,322

As the plan is consistent with the West Gateway Specific Plan and the Zoning Code and does not propose any new elements which conflict with adopted land use plans or policies no significant land use impact would result from implementation of the Master Plan.

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.

14. 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?*

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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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. The project is not near these areas.

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 Watershed Park Master Development 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 cause impacts from the loss of a locally-important mineral resource recovery site. See also Section 14.a) of this document.

15. 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?*

WHY? The project itself would not lead to a significant increase in ambient noise. The only long-term noise generated by the project would be typical urban environment noise associated with school activity and maintenance of the campus. The project includes the construction of a new outdoor pool and two new sports courts in the southeast corner of the campus, where an open field currently exists. The recreation area would be utilized for practice during school hours, after-school competitions, and occasional weekend use. The existing field is already utilized as an active recreation area for soccer and cheer practice as well as ancillary baseball and football practice. Activities related to the new recreation facilities would only moderately change the amplitude or frequency of sound generated at this recreational open space. Only occasional weekend use is anticipated. It is not anticipated the sports area would be used at night. Single family residences exist across Del Mar Boulevard approximately 200 feet south and west of the proposed outdoor recreation area. There are also single-family homes and multifamily structures west of the project site beyond the existing outdoor amphitheater, also approximately 200 feet from the proposed outdoor recreation area. These homes are separated from the proposed area where the pool and sports courts will be constructed by a significant amount of vegetation and mature trees. Further, the area of the proposed construction is located in a depression and is distinctly contained within an area that is below the grade at which the single-family homes are. The topography serves and would continue to serve as a natural barrier to sound traveling from the sports courts to the adjacent residences. To further ensure noise from the recreational area does not exceed the City’s noise ordinance standards, Mitigation Measure NOI-1 is included below. With this measure the proposed Master Plan would not result in significant impacts related to the generation of long-term noise in excess of established standards.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The project would generate short-term noise due to construction activities. However, the construction is required to adhere to City regulations governing hours of construction and noise levels generated by construction and mechanical equipment (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. As part of the construction staging plan, a traffic and parking plan for the construction phase is statutorily required for review and approval by 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 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 60 and 65 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 to noise levels in excess of standards.

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

WHY? The project is not located near any sources of groundborne noise or vibration. Construction activities on the campus may temporarily generate a limited amount of vibration. However, the project does not include pile driving or large scale demolition or grading, which are the construction activities typically associated with vibration impacts. Given the type of construction and the proposed hours of construction (daytime only), vibration impacts are considered less than significant.

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

WHY? See response to 15.a. Activity levels have the potential to increase at the southeast corner of the campus where the new outdoor recreation facilities are proposed. Mitigation Measure NOI-1 is included to ensure noise from these facilities does not reach significant levels. The Master Development Plan will allow build-out of the proposed structures only. The enrollment approved under the modification to CUP #4367 in 2008 is not changing with this Master Development Plan. Also, traffic circulation (i.e. pick-up/drop-off) is not changing. 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.

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. However, construction activities must adhere to City regulations governing hours of construction and noise levels generated by

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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construction and mechanical equipment. (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 is required to 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 result in a substantial temporary or periodic increase in noise levels.

- 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.

Mitigation Measure NOI-1: Prior to issuance of a building permit for outdoor recreational facilities, an acoustical study shall be prepared by a qualified acoustical consultant to ensure the anticipated uses/operations of the facilities do not exceed the standards in the City's Noise Ordinance (PMC 9.36). Consideration shall be given to the final design and intended uses of such recreational facilities and the location of the nearest sensitive receptors. Based on the analysis conducted by a qualified acoustical consultant, attenuation improvements may be required such as sound walls, landscaping, topographical features, or a combination of such improvements. The acoustical analysis shall be submitted to the City for review and approval, and all recommended attenuation improvements shall be installed to the satisfaction of the City.

16. 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? The project envisions the expanded use of the Maranatha High School, a permitted conditional use that has been operating since 2005. The expansion of the existing institutional use will have no direct effect on population growth in the area. The school was permitted a maximum enrollment of 800 students and the employment of 120 full time staff through an approved modification to the existing CUP #4367 in 2008. The

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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proposed project is consistent with the land use designations for the site (see Section 13 of this document). 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 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?*

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? No persons currently reside on the project site and the project site does not contain any existing dwelling units. Therefore, the proposed project would not displace any people, and would have no related impacts.

17. 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 project site is located in a low wildfire hazard area according to the Wildfire Hazard Map (Plate 4-2) of the adopted 2002 Safety Element of the City's General Plan. The project is approximately one mile from the nearest fire station located at 135 S. Fair Oaks Avenue to the east of the site. The Fire Department has serviced the site for many years when the location was operated as the Ambassador College and the construction of additional facilities for the existing high school would not require any additional Fire Service beyond what already exists.

The new structures will be required to incorporate safety and security features, including fire sprinklers, alarm systems, and adequate access for emergency vehicles in accordance with building and fire codes.

b. *Libraries?*

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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WHY? The project is located approximately 2.5 miles from the nearest branch library (Central Library). The Maranatha School has its own library facilities on-site and the project would not increase the population of the City (see Section 16 of this document). The project would not impact library services.

c. *Parks?*

WHY? The subject site is located approximately 1 to 2 miles from the nearest designated parkland (Memorial Park and Central Park). The establishment of a school use does not trigger a requirement for additional park land, or the upgrade of existing facilities. This is typically triggered by residential uses. The improvements proposed at the site include additional recreational facilities to serve the students. As such, the establishment of the school would not impact the existing park system in the community.

d. *Police Protection?*

WHY? The proposed project would not result in the need for additional new or altered police protection services and would not alter acceptable service ratios or response times. The proposed project consists of a Master Plan for the southeast quadrant of the former Ambassador College, proposing 29,000 square feet of new construction and 15,500 square feet of converted building space of existing structures into new facilities for Maranatha High School. This could increase the demand on the Pasadena Police Department. However, 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 Master Plan proposal would allow Maranatha High School to remain in the community. The use is a private high school and the proposed Master Development Plan would not increase the demand on local public schools. The school provides an additional educational choice for the community and would not require the addition of new public schools or facilities.

f. *Other public facilities?*

WHY? No other public facilities are anticipated to be impacted by the continued operation and expansion of Maranatha High School.

18. 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?*

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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WHY? The proposed project is a non-residential project that would not directly increase the City's population. The Maranatha School has its own existing recreational facilities and urban green spaces. The project itself would not lead to substantial physical deterioration of any recreational facilities, and would have no related impacts. The City collects a park impact fee for non-residential projects. These fees are used 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?*

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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WHY? The project does not include any offsite recreational facilities and would not require the construction or expansion of any offsite recreational facilities. The physical effects of the recreational facilities included in the proposed Master Plan are evaluated in this Initial Study as part of the proposed project. No adverse physical effects on the environment, other than those described herein, would occur as a result of the construction or expansion of recreational facilities.

19. TRANSPORTATION/TRAFFIC. Would the project:

a. *Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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WHY? The project site is located at 169 South St. John Avenue and is supported by a roadway network consisting of Green Street and Del Mar Boulevard. Of these roadways, Del Mar Boulevard from St. John to the easterly City limit is classified as a multimodal corridor in the 2004 Adopted Mobility Element of the General Plan.

According to the modification to CUP # 4367 approved on October 9, 2008, Maranatha High School is allowed a maximum enrollment of 800 students and 120 full and part-time staff. This Master Plan will maintain this entitled enrollment/staffing during the course of the Master Plan time frame (20 years is proposed). Since there is no change in the allowed enrollment or full time staff established in that modified CUP, the proposed Master Plan would not change the campus' trip generation. Therefore, operation of the campus under the proposed Master Plan would have no impact on the performance of the circulation system.

The City of Pasadena Department of Transportation reviews a project to determine if it is in compliance with plans and policies related to alternative modes of circulation (i.e. the Bicycle and Pedestrian Master Plans). The project has been reviewed and will not conflict with such plans and will not interfere with effectiveness of the overall circulation system.

During construction, heavy equipment (particularly that not involved with the removal or export of dirt from the site) would be moved onto or off the site as infrequently as possible, and would be staged on site during ongoing construction operations. Southbound St. John Avenue between Green Street and Colorado Boulevard

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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would be the primary access for equipment and trucks between the I-210 Freeway and the project site. Worker parking can be accommodated on-site, or at existing off-site areas to be determined. Construction traffic on Del Mar Boulevard would be limited as much as possible due to its residential nature. However, some heavy equipment and trucks would need to travel Del Mar Boulevard to directly access the limited amount of work occurring on the southernmost part of the site along Del Mar Boulevard. The street would not be used as an access route for work other than that construction along Del Mar Boulevard (new classroom building, swimming pool, sports court, and fencing). 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 must 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 significantly impact the performance of the circulation system during construction.

b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

WHY? See response 19a. The Los Angeles County Metropolitan Transportation Authority (MTA) adopted their most recent Congestion Management Program (CMP) in 2004. This CMP identifies level of service (LOS) E or better as acceptable for the designated CMP highway and road system. The CMP further states, “a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity (V/C [volume to capacity ratio] = 0.02), causing LOS F (V/C > 1.00). If the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity (V/C = 0.02).

In addition to CMP thresholds, the City’s “Transportation Impact Review Current Practice and Guidelines” August, 2005 state that the following changes in LOS due to a project are considered a significant traffic impact:

Intersection Capacity Analysis (ICU)	
Current ICU	Change due to project
A	0.060
B	0.050
C	0.040
D	0.030
E	0.020
F	0.010

Since the proposed Master Plan would not change the allowed enrollment or full time staff, there would be no change in the campus’ trip generation. Therefore, project generated trips will not reach the threshold of 50 trips required by the CMP to trigger the need for a traffic impact assessment at any CMP intersection. Likewise, project trips will also not reach the threshold of 150 required by the CMP to trigger the need for a traffic impact assessment at any freeway monitoring station. Thus, an impact analysis for CMP facilities is not required for the proposed project. In addition, according to PasDOT, the project would not impact the level of service (LOS) at any roadway intersections. Therefore, the proposed project would not exceed, either individually or cumulatively, an establish level of service standard, and would have no related significant impacts.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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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 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 its impact on circulation due to the proposed use and its design has been found not to be hazardous to traffic circulation either within the project or in the vicinity of the project. In addition, the project’s circulation design meets the City’s engineering standards. 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? Parking for a high school is based on the number of students and faculty. Based on a maximum student enrollment of 800, and a maximum number of faculty and employees of 120, the proposed use would require a total of 220 off-street parking spaces. The school is serviced by two parking lots. The largest parking lot is located under the athletic field and comprises of 306 parking spaces including Handicap parking spaces. The second parking lot is located on the east side of the student center and is comprised of 54 spaces including Handicap parking spaces for a total of 360 parking spaces. After accounting for the required parking for the high school, there will be a surplus of 140 off-street parking spaces. As such, there will be no on-street parking impacts as a result of the proposed high school.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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In regards to the shared parking between the high school and Harvest Rock Church, the Shared Parking Analysis indicates that there is adequate parking for both users. Specifically, the two uses operate at different hours and there should not be any overlap in parking demand. Moreover, the parking that currently exists, has serviced both the previous university use and the Ambassador Auditorium. In this case, the users have changed, but the uses are relatively the same and operate in a similar manner.

g. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

WHY? The project has been evaluated by the PasDOT and has been found to be consistent with the City's policies, plans, and programs supporting alternative transportation.

Conditions of approval have been added to the project through the Traffic Study prepared for CUP #4367 which established the Maranatha School at the current location. These conditions of approval require the applicant to comply with the TDM measures that prohibit queuing or parking for drop-off or pick-up on any street surrounding the campus, a carpooling program, discount bus passes, and bicycle racks. The Department of Transportation Conditions of Approval for CUP #4367 will remain in effect with approval of the Master Plan.

20. 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 meets wastewater treatment requirements because wastewater treatment facilities are designed to treat domestic sewage. The project does not involve the generation or release of unique or unusual waste 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.

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 consists of a net increase of 29,000 square feet of new and 15,500 square feet of converted development at the Maranatha Campus, and as a result, 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. The proposed project consists of an increase in allowed enrollment from 651 to 800 students, and an increase in staff from 84 to 120. If the Master Plan is approved, the number of students on site would increase from the current 651 to a maximum of 800. 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. The proposed project would be built within the overall growth foreseen in the area by the City of Pasadena General Plan, the West Gateway Specific Plan, and the Southern California Association of Government's Regional Comprehensive

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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Plan and Guide growth forecasts. Therefore, the proposed project would not require or result in the construction or expansion of new water or wastewater treatment facilities off-site, and the project would have no associated 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?*

WHY? The project would not require the construction of new storm water drainage facilities or the expansion of existing facilities. The project is located in a developed urban area where storm drainage is provided by existing streets, storm drains, flood control channels, and catch basins. As discussed in Section 12, the project would involve only minor changes in the site's drainage patterns and does not involve altering any drainage courses or flood control channels.

Further, as specific improvements are undertaken, the project applicant must submit and implement on-site drainage plans that meet 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 stormwater drainage improvements and the project would have no related 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 concern 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. During periods of drought, this project will be required to comply with the City's Water Shortage Procedures Ordinance, which reduces monthly water consumption to 90 percent of the expected consumption for this type of land use. 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. Therefore, the proposed project would have no significant impact under this topic.

As noted in the response to 8b, in September 2008, Council directed PWP to develop a comprehensive water conservation plan with a variety of approaches and recommendations for achieving 10%, 20% and 30% reductions in water consumption as well as an analysis of the financial impacts on the Water Fund if those conservation targets were achieved. On April 13, 2009, Council voted to approve the Comprehensive Water Conservation Plan presented by PWP and to replace the Water Shortage Procedure Ordinance with the Water Waste Prohibition and Water Shortage Plan Ordinance (PMC 13.10).

The Water Waste Prohibitions and Water Supply Shortage Plan Ordinance (PMC 13.10) became effective on July 4, 2009 and established thirteen permanent mandatory restrictions on wasteful water use activities. In addition, statewide water demand reduction requirements were implemented in 2009, as a result of efforts undertaken by the California Department of Water Resources, the State Water Resources Control Board, and other state agencies to implement the statewide 20x2020 Water Conservation Initiative Program.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The project is also required to adhere to the requirements of the Water Efficient Landscape Ordinance which was adopted in 2010. This ordinance is a result of State Assembly Bill 1881 (SB1881) which mandates that all local jurisdictions follow specific regulations for the efficient use of water in the irrigation of landscapes. The project must adhere to all applicable provisions on this ordinance which are contained in Title 13 (Utilities and Services) of the Pasadena Municipal Code. The ordinance may require design features that include specific plant types, the use of recycled water for irrigation and/or water features etc. Adherence to the requirements would reduce the amount of water used in the project landscaping and would aid the project in complying with all related water reduction provisions.

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 20.b) of this report, the proposed project consists of a net increase of 44,500 square feet of new and converted development at the Maranatha Campus, and as a result, would increase the demand for wastewater service. However, 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 to serve the proposed increase in demand. Therefore, the project would not result in insufficient wastewater service, and would cause no related significant impacts.

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

WHY? The project can be served by landfills with sufficient permitted capacity to accommodate the project's solid waste disposal needs. Solid waste disposal service in region is provided by the Sanitation Districts of Los Angeles County. The Sanitation Districts maintain a series of facilities including Scholl Canyon Landfill, Calabasas Landfill, Puente Hills Landfill and Material Recovery Facility (MRF), and various other MRFs and transfer stations. The project is located in a developed urban 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. Therefore, the project would cause no impacts under this topic

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

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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addition, the future construction activity onsite is required to comply with the City's Construction and Demolition Ordinance (PMC Section 8.62) and design requirements for refuge storage areas (PMC Section 17.64.240). The project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste.

21. 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).

Earlier Analysis Used: None.

22. 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 on Aesthetics or Air Quality. Also, as discussed in Sections 6 and 12 of this document, the proposed project would not have substantial impacts on special status species, stream habitat, or 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, the proposed project would not have substantial impacts on historical, archaeological, or paleontological resources, and thus, would not eliminate any important examples of California history or prehistory. As discussed in Sections 12, 14 and 15 of this document, the proposed project would not have substantial impacts on water quality, mineral resources or noise. Therefore, the project would not substantially degrade the quality of the environment, including 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, greenhouse gas, hydrology, water quality, noise, public services, traffic, and utility impacts. Of these cumulative conditions, cumulative air quality impacts (i.e. the non-attainment status of the air basin) and cumulative climate change impacts are recognized as substantial. As discussed in Section 5.c. of this document, the project's contribution to the cumulative air quality scenario is not considerable. Similarly, as discussed in Section 10 of this document, the project's contribution to climate change is not considerable. The project would not cause any other cumulative impact to

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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become substantial and would not otherwise considerably contribute to any cumulative impact. Therefore, the proposed project would not result in 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?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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WHY? As discussed in Sections 5, 11, 12, and 19 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. Although students of the proposed project 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, 13 Land Use and Planning, 15 Noise, 16 Population and Housing, 17 Public Services, 18 Recreation, 19 Transportation/Traffic and 20 Utilities and Service Systems the project would not indirectly cause substantial adverse effects on humans.

Therefore, the proposed project would not result in a Mandatory Finding of Significance due to environmental effects that could cause substantial adverse effects on humans.

INITIAL STUDY REFERENCE DOCUMENTS

#	Document
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	Cultural Resources of the Recent Past, City of Pasadena, October 2007
28	Maranatha Master Development Site Plan, Mosaic Architecture, modified by Onyx Architecture, December, 2013
29	A master plan design study that includes design guidelines for the future development of Maranatha High School, Onyx Architects, December, 2013



**City of Pasadena
Planning Division
175 N. Garfield Avenue
Pasadena, California 91101-1704**

FINAL MITIGATED NEGATIVE DECLARATION

PROJECT TITLE: Maranatha High School Master Plan

PROJECT APPLICANT: Steve Lazarian, CityWorks Management LLC

PROJECT CONTACT PERSON: Steve Lazarian, CityWorks Management LLC

CONTACT PERSON ADDRESS: 2650 East Foothill Boulevard, Suite #201 Pasadena CA 91107

TELEPHONE: 626 375-9803

PROJECT LOCATION: 169 South Saint John Avenue, Pasadena, CA 91101

PUBLIC REVIEW PERIOD: May 7, 2014 – June 6, 2014

PROJECT DESCRIPTION: The proposed Master Plan would take place in three phases, with the expectation that each phase would take approximately 6 and ½ years to complete. The MHS Master Plan does not propose to increase student enrollment or faculty/staff beyond the currently entitled limit. It proposes a maximum build out of the physical facilities needed to serve the 800 students and 120 full-time employees approved under the modification to the existing Conditional Use Permit #4367 which established this use at this location. The Master Plan is not proposing changes to the drop-off/pick-up areas. The Master Plan will result in a total of approximately 29,000 square of new construction and 15,500 square of remodeled or converted space. Apart from the new construction and remodel or conversion of space, the project scope also calls for the installation of a perimeter fence, after-the-fact permitting of campus signage, a new outdoor pool and two new sports courts.

FINDING

On the basis of the initial study on file in the Planning & Community Development Department Office:

The proposed project COULD NOT have a significant effect on the environment.

The proposed project COULD have a significant effect on the environment, however there will not be a significant effect in this case because the mitigation measures described in the attached Mitigation Monitoring Program. A copy of the Initial Study is available at the

Planning and Community Development Department, 175 N. Garfield Ave., Pasadena, Ca. 91104. You may contact Vicrim Chima at 626-744-6791 or vcchima@cityofpasadena.net.

_____ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Completed by: Vicrim Chima
Title: Planner
Date: December 15, 2014

nd-mnd.doc

MITIGATION MONITORING AND REPORTING PROGRAM

**MARANATHA HIGH SCHOOL MASTER PLAN
169 SOUTH SAINT JOHN AVENUE**

This Mitigation Monitoring and Reporting Program (MMRP) for PLN2010-00291 , located at 169 South Saint John Avenue, has been prepared pursuant to the California Environmental Quality Act (CEQA – Public Resources Code, Section 21000 *et seq.*), the CEQA Guidelines (Cal. Code Regs., Title 14, Chapter 3, Sections 15074 and 15097) and the City of Pasadena CEQA Guidelines. A master copy of this MMRP shall be kept in the office of the Zoning Administrator and shall be available for viewing upon request. A copy also will be available at the office of the Condition/Mitigation Monitoring Coordinator.

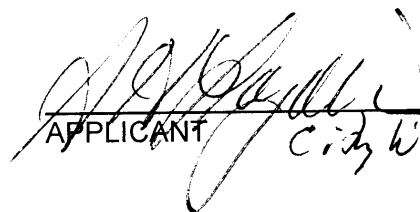
PROJECT DESCRIPTION: The proposed Master Plan would take place in three phases, with the expectation that each phase would take approximately 6 and ½ years to complete. The MHS Master Plan does not propose to increase student enrollment or faculty/staff beyond the currently entitled limit. It proposes a maximum build out of the physical facilities needed to serve the 800 students and 120 full-time employees approved under the modification to the existing Conditional Use Permit #4367 which established this use at this location. The Master Plan is not proposing changes to the drop-off/pick-up areas. The Master Plan will result in a total of approximately 29,000 square of new construction and 15,500 square of remodeled or converted space. Apart from the new construction and remodel or conversion of space, the project scope also calls for the installation of a perimeter fence, after-the-fact permitting of campus signage, a new outdoor pool and two new sports courts.

This MMRP includes mitigation measures in the Mitigation Monitoring and Reporting Matrix on the following pages that correspond to the final Mitigated Negative Declaration (MND) for the project. The matrix lists each mitigation measure or series of mitigation measures by environmental topic. For each mitigation measure, the frequency of monitoring and the responsible monitoring entity is identified. Mitigation measures may be shown in submittals and may be checked only once, or they may require monitoring periodically during and/or after construction. Once a mitigation measure is complete, the responsible monitoring entity shall date and initial the corresponding cell, and indicate how effective the mitigation measure was.

If any mitigation measures are not being implemented, the City may pursue corrective action. Penalties that may be applied include, but are not limited to, the following: (1) a written notification and request for compliance; (2) withholding of permits; (3) administrative fines; (4) a stop-work order; (5) forfeiture of security bonds or other guarantees; (6) revocation of permits or other entitlements.

Monitoring Program Cost:

I HEREBY AGREE TO PAY THE CITY MONITORING FEES, AND IMPLEMENT THESE MITIGATION MEASURES, AT A MINIMUM, IN THE DESIGN, CONSTRUCTION, AND MAINTENANCE OF THE PROJECT.



APPLICANT City Works

11-25-14
DATE

**Mitigation Monitoring and Reporting Program Matrix
 PLN2010-00291 and 169 South Saint John Avenue**

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Effectiveness
Impact – Aesthetics				
<p>Mitigation Measure AES-1: To the satisfaction of the City of Pasadena’s Design and Historic Preservation Staff, future onsite buildings resulting from the subject Master Plan shall be in compliance with the guidelines set forth in the <i>Master Plan Design Study that Includes Design Guidelines for the Future Development of Maranatha High School</i>, Onyx Architects, December 2014. The City’s review for compliance with this measure shall occur prior to the issuance of a building permit and as part of the City’s Design Review Process established by the thresholds contained within the West Gateway Specific Plan.</p>	<p>Prior to issuance of a building permit</p>	<p>Planning and Community Development Department</p>		
Impact – Biological Resources				
<p>Mitigation Measure BIO-1: Construction activities that result in grading or in the removal of shrubs or trees shall be conducted during the non-breeding season for birds (approximately September 1 through February 1), to the maximum extent feasible. Portions of project area where construction must take place during the nesting season (February 2 through August 31) shall be grubbed and graded to remove any potential nesting habitat for birds, per the oversight of a</p>	<p>Prior to issuance of a building permit</p>	<p>Planning and Community Development Department</p>		

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Effectiveness
<p>qualified ornithologist, prior to February 1. This will avoid violations of the Federal Migratory Bird Treaty Act and California Fish and Game Code Sections 3503, 3503.5 and 3513. Alternatively, if grubbing and grading activities cannot avoid the bird breeding season, the applicant shall retain the services of a qualified ornithologist approved by the City to conduct surveys of the construction zone. The first survey shall occur not more than three days prior to the initiation of clearing and grubbing activities and follow-up surveys shall be conducted weekly thereafter during the breeding season. If the ornithologist detects any occupied nests of native birds within the construction zone, the applicant shall notify the City and conspicuously flag off the area(s) supporting bird nests, providing an adequate buffer zone to protect nest/individuals as determined by the ornithologist (typically a minimum buffer of 300 feet for most species and 500 feet for raptors). The construction crew shall be instructed to avoid any activities in this zone until the bird nest(s) is/are no longer occupied per the written determination of a qualified ornithologist. The project proponent shall record the results of any undertaken protective measures to document compliance with applicable State and Federal laws pertaining to the protection of migratory</p>				

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Effectiveness
birds. Upon completion, such recordation shall be provided to the City of Pasadena.				
Impact – Cultural Resources				
<p>Mitigation Measure CRS - 1: To the satisfaction of the City of Pasadena's Design and Historic Preservation Staff, future onsite buildings resulting from the subject Master Plan shall be in compliance with the guidelines set forth in the <i>Master Plan Design Study that Includes Design Guidelines for the Future Development of Maranatha High School</i>, Onyx Architects, December 2014. The City's review for compliance with this measure shall occur prior to the issuance of a building permit and as part of the City's Design Review Process established by the thresholds contained within the West Gateway Specific Plan.</p>	Prior to issuance of a building permit	Planning and Community Development Department		
<p>Mitigation Measure CRS – 2: If archaeological resources are encountered during project construction, all construction activities in the vicinity of the find shall halt until an archeologist certified by the Society of Professional Archeologists examines the site, identifies the archaeological significance of the find, and recommends a course of action. Construction shall not resume until the site archeologist states in writing that the proposed construction activities will not significantly</p>	Prior to issuance of a building permit	Planning and Community Development Department		

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Effectiveness
damage archaeological resources.				
<p>Mitigation Measure CRS – 3: If paleontological resources are encountered during project construction, all construction activities in the vicinity of the find shall halt until a paleontologist meeting the satisfaction of the Natural History Museum of Los Angeles County identifies the paleontological significance of the find, and recommends a course of action. Construction shall not resume until the site paleontologist states in writing that the proposed construction activities will not significantly damage paleontological resources.</p>	Prior to issuance of a building permit	Planning and Community Development Department		
Impact 3 – Noise				
<p>Mitigation Measure NOI-1: Prior to issuance of a building permit for outdoor recreational facilities, an acoustical study shall be prepared by a qualified acoustical consultant to ensure the anticipated uses/operations of the facilities do not exceed the standards in the City’s Noise Ordinance (PMC 9.36). Consideration shall be given to the final design and intended uses of such recreational facilities and the location of the nearest sensitive receptors. Based on the analysis conducted by a qualified acoustical consultant, attenuation improvements may be required such as sound walls, landscaping, topographical features, or a combination of such</p>	Prior to issuance of a building permit	Planning and Community Development Department		

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Effectiveness
improvements. The acoustical analysis shall be submitted to the City for review and approval, and all recommended attenuation improvements shall be installed to the satisfaction of the City.				