



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

INITIAL STUDY

In accordance with the Environmental Policy Guidelines of the City of Pasadena, this analysis and supporting data constitute the Initial Study for the subject project. This Initial Study provides the assessment for a determination whether the project may have a significant effect on the environment.

The proposed project is the *2014-2021 Housing Element*. Adoption of the *Housing Element* will not entitle or fund any specific projects and, thus, would not result in any direct physical changes to the environment. Indirectly, the proposed *Housing Element* would support and, in some cases, promote the future development and improvement of various forms of residential development across the City in accordance with the City's adopted General Plan Land Use Element. To the extent that potential future physical changes in the environment can be reasonably discerned, they are evaluated herein at the program level. Project-level analysis would occur as specific housing development and improvement projects are proposed.

SECTION I - PROJECT INFORMATION

1. Project Title: 2014-2021 Housing Element
2. Lead Agency Name and Address: City of Pasadena
100 North Garfield Avenue
Pasadena, CA 91101
3. Contact Person and Phone Number: Denver Miller
626-744-6773
4. Project Location: City of Pasadena (Citywide), Los Angeles County, CA
5. Project Sponsor's Name and Address: City of Pasadena
100 North Garfield Avenue
Pasadena, CA 91101
6. General Plan Designation: Citywide
7. Zoning: Citywide
8. Description of the Project: The City of Pasadena has prepared the *2014-2021 Housing Element of the General Plan* to be adopted as required by Government Code Section 65580 *et seq.* The *General Plan Housing Element* is a multi-year housing plan covering the period 2014-2021. The *Housing Element* identifies goals, policies, programs and objectives that focus on the following: (1) housing and neighborhood quality, (2) housing supply and diversity, (3) housing assistance, and (4) housing for people with special needs.

The *2014-2021 Housing Element* consists of the following major components:

- A series of goals, policies, and scheduled programs to further develop, improve, and preserve housing (Housing Framework);
- Identification and analysis of existing and projected housing needs (Appendix A);
- An analysis of various governmental and nongovernmental constraints to meeting the housing needs (Appendix B);
- An inventory and demonstration that the City has sufficient sites to meet its RHNA requirement (Appendix C)
- In addition, the Draft Housing Element includes a Program Evaluation (Appendix D) that evaluates the current housing programs and accomplishments and documents comments received from the public and stakeholder meetings, and
- Community Initiative (Appendix E) that includes the results of community housing forums held over the past decade.

The *2014-2021 Housing Element* does not propose significant changes to any other element of the City's adopted General Plan. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. If it becomes apparent over time that changes to any element of the General Plan are necessary to ensure that internal consistency is maintained, such changes will be proposed for consideration before relevant advisory bodies, the Planning Commission, and the City Council.

Adoption of the *2014-2021 Housing Element* will not entitle or fund any specific projects and, thus, would not result in any direct physical changes to the environment. The *Element* lists programs that may be utilized by development projects that require approvals and review under the *California Environmental Quality Act*, but the *Element* does not provide the approval for any development project or for any program that may be utilized by a development project. Indirectly, the proposed *Housing Element* would support and, in some cases, promote the future development and improvement of various forms of residential development across the City in accordance with the City's adopted General Plan Land Use Element. To the extent that potential future physical changes in the environment can be reasonably discerned, they are evaluated herein at the program level. Project-level analysis would occur as specific housing development and improvement projects are proposed.

The 2014-2021 Housing Element includes a program to comply with state law (SB 2) requiring that emergency homeless shelters be permitted without discretionary approval in at least one zoning district. The objective of this program is to amend the Zoning Code to allow emergency shelters by right in at least one zoning district, with specific standards for emergency shelters that are permitted without discretionary approval. Neither the boundaries of a district nor the specific standards are specified by the Housing Element. The required amendment will be analyzed and adopted when the standards for review are developed.

The *2014-2021 Housing Element* represents the discussion and concerns of local stakeholders about housing in Pasadena. The goals, policies, and programs of the *Housing Element* are the result of input from the residents, community stakeholders, technical analysis, and evaluation of existing and future land use patterns.

9. Surrounding Land Uses and Setting: (Briefly describe the project's surroundings):

The project is the proposed City of Pasadena *2014-2021 Housing Element* and is applicable to the entire city. Land uses in and adjacent to the City include residential, commercial, commercial recreation, industrial, institutional, and open space. Nearby jurisdictions include La Canada Flintridge, Glendale, Los Angeles, San Marino, Arcadia, Sierra Madre, unincorporated Los Angeles County, and Angeles National Forest.

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

The Housing Element requires approval by the City Council with a recommendation from the Planning Commission. The Housing Element is reviewed by the State Housing and Community Development Department.

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		Greenhouse Gases		Noise
	Agricultural Resources		Geology and Soils		Population and Housing
	Air Quality		Hazards and Hazardous Materials		Public Services
	Biological Resources		Hydrology and Water Quality		Recreation
	Cultural Resources		Land Use and Planning		Transportation/Traffic
	Energy		Mineral Resources		Utilities and Service Systems
					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.	X
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.	

Denver E. Miller 12-19-2013
Prepared By Date

John M. Bellas 12-19-2013
Reviewed By Date

Denver E. Miller
Printed Name

John Bellas
Printed Name

Negative Declaration/Mitigated Negative Declaration adopted on: Date: _____

Adoption attested to by: _____
Signature Date

Printed name

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

SECTION II - ENVIRONMENTAL CHECKLIST FORM

1. BACKGROUND.

Date checklist submitted: 2013
 Department requiring checklist: Planning & Community Development Department
 Case Manager: Denver Miller

2. ENVIRONMENTAL IMPACTS. (An explanation of all answers is required.):

3. AESTHETICS. Would the project:

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

WHY? Scenic vistas in Pasadena include views of the San Gabriel Mountains to the north (primarily afforded from north-south roadways) and open space areas such as the Arroyo Seco and Eaton Wash canyons. The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvement and would not alter any physical development standards. It proposes no changes to the *General Plan 2004 Land Use Element* text or Diagram, to a base zoning designation, or to any physical development standards. Thus, the proposed Housing Element would not affect views from roadways or open space areas. The project will have no adverse effect on a scenic vista.

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

WHY? The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the *General Plan 2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. No changes to viewsheds along scenic roadways are anticipated to result from adoption of the proposed Housing Element. The project will have no impact on scenic resources.

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

WHY? The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements and would not alter any physical development standards. It proposes no changes to the *General Plan 2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. Inasmuch as the *Housing Element* could indirectly result in residential development and improvement, the project could result in increased density in residential and mixed-used areas of the City. However, given that the City is largely built-out and future development would be subject to the City's development standards, such increased density is anticipated to be consistent with existing development patterns. In addition, the City's Design Review process will improve the visual character and quality of many future residential developments when actual projects are proposed. Finally, certain programs supported by the *Housing Element*, such as the City's ongoing code enforcement and housing rehabilitation programs, could improve visual character and quality by reducing the amount of blighted properties. Therefore, adoption of the proposed *Housing Element* would not cause any significant adverse impacts on visual character or quality.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ()

WHY? The project is the City's 2014-2021 Housing Element. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan 2004 Land Use Element or Diagram, to a base zoning designation, or to any physical development standards. The project will have no impact on 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:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? ()

WHY? The City of Pasadena is a developed urban area surrounded by hillsides to the north and northwest. The western portion of the City contains the Arroyo Seco, which runs from north to south through the City. It has commercial recreation, park, natural and open space. The City contains no prime farmland, unique farmland, or farmland of statewide importance, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

The project is the City's 2014-2021 Housing Element. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan 2004 Land Use Element or Diagram, to a base zoning designation, or to any physical development standards. The project will have no impact on farmland.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? ()

WHY? The City of Pasadena has no land zoned for agricultural use other than commercial growing areas. Commercial Growing Area/Grounds is permitted in the CG (General Commercial), CL (Limited Commercial), and IG (General Industrial) zones and conditionally in the RS (Residential Single-Family), and RM (Residential Multi-Family) districts. The use is also permitted within certain specific plan areas.

The project is the City's 2014-2021 Housing Element. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan 2004 Land Use Element or Diagram, to a base zoning designation, or to any physical development standards. The project will have no impact on zoning for agricultural use or a Williamson Act contract.

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

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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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. Further, the project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards.

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. Further, the project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards.

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. Further, the project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards.

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 adopted plan is the 2012 AQMP. 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.

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

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 project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. The project is consistent with the growth expectations for the region. The proposed project is therefore consistent with the AQMP and the West San Gabriel Valley Air Quality Plan, and would have no associated impacts.

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

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

Pasadena is located in a non-attainment area, an area that periodically exceeds national and state 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).

However, the project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. Inasmuch as the *Housing Element* could indirectly result in residential development and improvement, the project could result in air pollutant generation from construction activities, increased vehicle use, natural gas combustion, and other operational sources. Such emissions could incrementally contribute to the Basin's non-attainment conditions. However, the City has multiple policies, programs, and plans in place that reduce emissions. The City's General Plan Land Use Element and zoning code focus most of the City's residential growth into mixed-use urban areas with transit opportunities, and the City has multiple policies that promote transit oriented development (TOD). Thus, future residential growth in Pasadena is expected to result in a lower number of vehicle miles traveled (VMT) per capita than existing residential uses in the City and lower than both existing and future VMT estimates for the region as a whole. Thus, by directing residential development to the urbanized areas of Pasadena rather than to suburban areas that are more dependent on automobile travel, the proposed *Housing Element* implements policies that are intended to improve the Basin's attainment status. Additionally, Pasadena's Green City Action Plan and Green Building Ordinance, which exceeds California Green Building Code requirements, would result in lower emissions from future residential buildings than exiting residential buildings in Pasadena and existing and future residential buildings in the region. In summary, future residential development supported by the proposed *Housing Element* is required to implement policies and programs that reduce VMT per capita and reduce building energy and natural gas consumption per square foot, thus furthering plans intended to improve the Basin's attainment status. Therefore, the City considers the potential future air emissions that could indirectly result from adoption of the proposed *Housing Element* and their potential contribution to air quality violations a less than significant impact of the project.

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

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

WHY? The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. Consequently, it would not expose sensitive receptors to substandard pollutant concentrations.

e. *Create objectionable odors affecting a substantial number of people? ()*

WHY? The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards.

Further, housing is not shown on the 1993 SCAQMD's CEQA Air Quality Handbook Figure 5-5 "Land Uses Associated with Odor Complaints." The project would not create objectionable odors.

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 the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. Inasmuch as the *Housing Element* could indirectly result in residential development and improvement, the project could result in increased density in residential and mixed-used areas of the City. However, the City is largely build-out the City's General Plan Land Use Element and zoning code focus most of the City's residential growth into urbanized portions of the City. Therefore, adoption of the proposed *Housing Element*, would have no impact on any species identified as candidate, sensitive, or special status in a local, regional or California plans, policy or regulation.

b. *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 is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. Inasmuch as the *Housing Element* could indirectly result in residential development and improvement, the project could result in increased density in residential and mixed-used areas of the City. However, the City is largely build-out the City's General Plan Land Use Element and zoning code focus most of the City's residential growth into urbanized portions of the

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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City. No wetlands existing in the urbanized portions of the City. Adoption of the proposed *Housing Element* will have no impact on federally protected wetlands.

- c. *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 the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the *General Plan 2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. The proposed *Housing Element* would not result in any changes in the land use pattern of the City. It will have no impact on the movement of any fish or wildlife species, on established wildlife corridors, or on native wildlife nursery sites.

- d. *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 project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements or removal of trees. It proposes no changes to the *General Plan 2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. It will have no impact on any policy or ordinance protecting biological resources.

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

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

7. CULTURAL RESOURCES. Would the project:

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

WHY? The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the *General Plan 2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. Future projects implementing certain goals and policies of the proposed *Housing Element* could involve historic resources. However, such projects would be subject to the City's development standards and processes which include strict protections for historical resources. Future modification of any historical resource would require additional discretionary approvals by the City of Pasadena. Thus, adoption of the proposed *Housing Element* would not result in any substantive changes in the significance of any historical resources.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? ()

WHY? The project is the City's 2014-2021 Housing Element. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan 2004 Land Use Element or Diagram, to a base zoning designation, or to any physical development standards. It will cause no substantive change in the significance of an archaeological resource.

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

WHY? The project is the City's 2014-2021 Housing Element. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan 2004 Land Use Element or Diagram, to a base zoning designation, or to any physical development standards. It will not affect any paleontological or geologic site or feature.

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

WHY? The project is the City's 2014-2021 Housing Element. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan 2004 Land Use Element or Diagram, to a base zoning designation, or to any physical development standards. It will not disturb any human remains.

8. ENERGY. Would the proposal:

a. Conflict with adopted energy conservation plans?

WHY? The proposed Housing Element does not conflict with the 1983 adopted Energy Element of the General Plan. The proposed Housing Element will not result in the approval of any physical improvements. It proposes no changes to the General Plan 2004 Land Use Element or Diagram, to a base zoning designation, or to any physical development standards. The development that is described in the Housing Element is within the intensity allowed by the Zoning Code and envisioned in the City's approved General Plan. Therefore, the proposed Housing Element will not conflict with any adopted energy conservation plans and would cause no related impacts.

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

WHY? The project is the City's 2014-2021 Housing Element. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan 2004 Land Use Element or Diagram, to a base zoning designation, or to any physical development standards. It will not result in the use of non-renewable resources in a wasteful and inefficient manner.

9. GEOLOGY AND SOILS. Would the project:

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

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

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

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

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

These Alquist-Priolo maps show only one Fault Zone in or adjacent to the City of Pasadena, the Raymond (Hill) 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; and
- A Possible Active Strand of the Sierra Madre Fault, which appears to join a continuation of the Sycamore Canyon Fault. This fault area traverses the northern portion of the City as is identified as a Fault Hazard Management Zone for Critical Facilities Only.

The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. Inasmuch as the *Housing Element* could indirectly result in residential development and improvement, future residential projects could expose additional persons and structures to seismic hazards. However, any such future projects would be required to comply with Building Code requirements for seismic safety. Therefore, adoption of the proposed Housing Element would not result in any significant impacts related to exposure of people or structures to potential substantial adverse effects caused by the rupture of a known fault.

ii. *Strong seismic ground shaking? ()*

WHY? 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.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The risk of earthquake damage is minimized because new structures shall be built according to the Uniform Building Code and other applicable codes, and are subject to inspection during construction. Structures for human habitation must be designed to meet or exceed California Uniform Building Code standards for Seismic Zone 4.

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

WHY? The 2002 Safety Element of the City's General Plan (Plate P-1) identifies liquefaction hazard areas in Pasadena to be primarily in the Arroyo Seco, Eaton Wash, and San Rafael Hills portions of the City. The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. Inasmuch as the *Housing Element* could indirectly result in residential development and improvement, future residential projects could expose additional persons and structures to seismic hazards. However, any such future projects would be required to comply with Building Code requirements for seismic safety. Therefore, adoption of the proposed Housing Element would not result in any significant impacts related to exposure of people or structures to potential substantial adverse effects caused by seismic-related ground failure.

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

WHY? The 2002 Safety Element of the City's General Plan (Plate P-1) identifies liquefaction hazard areas in Pasadena to be primarily associated with the slopes of the San Gabriel Mountains and the western hillside areas of the City. The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. Inasmuch as the *Housing Element* could indirectly result in residential development and improvement, future residential projects could expose additional persons and structures to seismic hazards. However, any such future projects would be required to comply with Building Code requirements for seismic safety. Therefore, adoption of the proposed Housing Element would not result in any significant impacts related to exposure of people or structures to potential substantial adverse effects caused by landslides.

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

WHY? The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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zoning designation, or to any physical development standards. Inasmuch as the *Housing Element* could indirectly result in residential development and improvement, future residential construction projects could temporarily expose soils to water and wind erosion during grading. However, such potential future construction activities would be required to implement dust control measures required by SCAQMD Rule 403 and water erosion protections required by the Clean Water Act and the National Pollutant Discharge Elimination System (NPDES). Therefore, the proposed project will not result in substantial soil erosion or loss of topsoil.

- 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 project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. Inasmuch as the *Housing Element* could indirectly result in residential development and improvement, future residential projects could be exposed to unstable geologic units or soils. However, any such future projects would be required to comply with Building Code requirements for soil stability. Therefore, the proposed project will not result in any significant impacts related to physical development being located in a geological unit or soil that is unstable or that may become unstable as a result of the project.

- 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.

The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. Inasmuch as the *Housing Element* could indirectly result in residential development and improvement, future residential projects could be exposed to expansive soils. However, any such future projects would be required to comply with Building Code requirements for expansive soils. Therefore, the proposed project will not result in any significant impacts related to physical development being located on expansive soil.

- 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 is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the General Plan *2004 Land Use Element* or Diagram,

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

to a base zoning designation, or to any physical development standards. Any future residential development supported by the *Housing Element* is required to connect to the existing sewer system. Therefore, the proposed project will not result in physical development being located on soils that are incapable of supporting septic tanks or alternative wastewater disposal systems.

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? The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the *General Plan 2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. The *Housing Element* includes an inventory of sites that are adequate to accommodate the City's assigned share of regional housing need, but it does not propose development projects. Inasmuch as the *Housing Element* could indirectly result in residential development and improvement, the project could result in greenhouse gas (GHG) emissions from construction activities, increased vehicle use, energy consumption, natural gas combustion, water usage (i.e., water transport energy consumption), and other building sources. Such emissions would incrementally contribute to the global GHG levels. However, the City has multiple policies, programs, and plans in place that reduce emissions. The City's *General Plan Land Use Element* and zoning code focus most of the City's residential growth into mixed-use urban areas with transit opportunities, and the City has multiple policies that promote transit oriented development (TOD). Thus, future residential growth in Pasadena is expected to result in a lower number of vehicle miles traveled (VMT) per capita than existing residential uses in the City and lower than both existing and future VMT estimates for the region as a whole. Thus, by directing residential development to the urbanized areas of Pasadena rather than to suburban areas that are more dependent on automobile travel, the proposed *Housing Element* implements policies that are intended to reduce GHG emissions from the business as usual (BAU) scenario. Additionally, Pasadena's *Green City Action Plan* and *Green Building Ordinance*, which exceeds California *Green Building Code* requirements, would result in lower emissions from future residential buildings than exiting residential buildings in Pasadena and existing and future residential buildings in the region. In summary, future residential development supported by the proposed *Housing Element* is required to implement policies and programs that reduce VMT per capita, reduce building energy consumption, and reduce water demand. Therefore, adoption of the *Housing Element* would not result in any significant greenhouse gas emission impacts.

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

WHY? The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the *General Plan 2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. The *Housing Element* includes an inventory of sites that are adequate to accommodate the City's assigned share of regional housing need, but it does not propose development projects. Therefore, the project will not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions.

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?* ()

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

WHY? The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements or use of hazardous materials. It proposes no changes to the *General Plan 2004 Land Use Element* or Diagram, to a base zoning designation or to any physical development standards. Future projects that could be undertaken to implement the *Housing Element* would be residential in nature and would not be expected to involve hazardous materials. Therefore, the proposed project will not create any hazard through transport, use, or disposal of hazardous materials.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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WHY? The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the *General Plan 2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. Future projects that could be undertaken to implement the *Housing Element* would be residential in nature and would not be expected to involve hazardous materials. Therefore, the proposed project will not create any hazard through release of hazardous materials.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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WHY? The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the *General Plan 2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. Future projects that could be undertaken to implement the *Housing Element* would be residential in nature and would not be expected to involve hazardous materials. The proposed project will not involve hazardous emissions or the handling of hazardous materials, substances 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?* ()

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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WHY? The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the *General Plan 2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. Inasmuch as the *Housing Element* could indirectly result in residential development and improvement, future residential projects could involve hazardous material sites. While unexpected, if such a scenario arises, the project would be subject to various federal, state, and local laws and agencies that regulate hazardous material sites, such as the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), the state and federal Environmental Protection Agencies (EPA), the California Department of Toxic Substances Control (DTSC), and the Pasadena Fire Department. Therefore, the proposed project will not result in significant impacts related to hazardous material sites compiled pursuant to Government Code Section 65962.5.

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

residential and mixed-used areas of the City. While most residential areas of the City are not within fire hazard zones, certain residential neighborhoods in the western hillsides portion of the City and adjacent to the San Gabriel Mountains to the north are within Very High and Moderate Fire Hazard Zones (see Plate P-2 of the Safety Element). Residential development is subject to building code standards for fire suppression and to Fire Department review. Given the limited fire hazards in the City and the existing fire safety plans, policies, and regulations in place, impacts related to wildland fires are less than significant.

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, most recently in 2001. Under this MS4, each permitted municipality is required to implement the SOMP.

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 SOMP. This ordinance requires most new developments to submit a plan to the City that demonstrates how the development project will comply with the City's SUSMP.

The project is the City's *2014-2021 Housing Element*. It will not result in the approval of any physical improvements. It proposes no changes to the *General Plan 2004 Land Use Element* or Diagram, to a base zoning designation, or to any physical development standards. Inasmuch as the *Housing Element* could indirectly result in residential development and improvement, the project could indirectly result in stormwater pollutants. However, with the compliance with NPDES, MS4, and SUSMP requirements, such stormwater pollutants would not violate water quality standards or waste water requirements.

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)?* ()