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Once completed, the proposed project site would not involve the use of any significant quantities of hazardous materials. The project will adhere to applicable zoning and fire regulations regarding the use and storage of any hazardous substances to prevent the potential for emissions of any potentially hazardous materials. Therefore, the proposed project would have a less than significant impact since the potential for emission of hazardous materials during construction and operation is considered very unlikely.

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 (CalEPA) (2014). The site 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 on-site. Therefore, the project would not result in any impacts associated with hazardous materials sites.

e. *For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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 Burbank Bob Hope Airport, which is approximately 16 miles northwest of the project site. 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

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has preplanned evacuation routes for dam inundation areas associated with Devil's Gate Dam, Eaton Wash, and the Jones Reservoir.

The construction and operation of the proposed project would not place any permanent or temporary physical barriers on any existing public streets. To ensure compliance with zoning, building, and fire codes, the project 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 City's General Plan 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 wildland 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 in 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). The 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 does not exceed water quality standards.

Compliance with the SQMP is ensured by Section 402 of the Clean Water Act, which is known as the National Pollutant Discharge Elimination System (NPDES). Under this section, municipalities are required to obtain permits for the water pollution generated by stormwater in their jurisdiction. These permits are known as Municipal Separate Storm Sewer Systems (MS4) permits. The City of Pasadena is a co-permittee in the Los Angeles County MS4 permit (Order No. 01-182; NPDES No. CAS0041 as amended by Orders R4-2006-0074 and R4-2007-0042). Under this MS4, each permitted municipality is required to implement the SQMP.

In accordance with the countywide 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 the SQMP. This ordinance

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

The project consists of improving the campus for the Villa Esperanza Services. None of the proposed uses are point source generators of water pollutants; thus, no quantifiable water quality standards apply to the project. As an urban development, the proposed project would add typical, urban, nonpoint-source pollutants to stormwater runoff. As discussed, these pollutants are permitted by the countywide MS4 permit and would not exceed any receiving water limitations. Because the project includes more than 5,000 square feet of surface area, a plan for implementing best management practices would be required to be submitted to City Engineer. Compliance with the MS4 permit and the SUSMP would ensure that the proposed project would not violate any water quality standards or waste discharge requirements. As such, impacts would be less than significant.

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? A project would normally have a significant impact on groundwater supplies if it were to result in a demonstrable and sustained reduction of groundwater recharge capacity or change the potable water levels such that it would reduce the ability of a water utility to use the groundwater basin for public water supplies or storage of imported water, reduce the yields of adjacent wells or well fields, or adversely change the rate or direction of groundwater flow.

The proposed 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 that could be intercepted by excavation or development of the project. Therefore, the proposed project would not physically interfere with any groundwater supplies.

The proposed project would use the existing water supply system provided by the PWP. The source of some of this water supply is groundwater, stored in the Raymond Basin. Thus, the project could indirectly withdraw groundwater. However, the proposed project's water usage would be negligible in comparison to the overall water service provided by the PWP. Under normal operation, the project would use approximately 6,000 gallons of water per day. Per the PWP, existing entitlements and sources can serve the proposed project. This minor amount of water use would not result in significant impacts from depletion of groundwater supplies.

As noted in subsection 8, Energy, Issue b), over the past several years, the PWP has been impacted by several factors that have restricted local and regional water supply. The 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.

Pasadena Municipal Code Chapter 13.10 establishes 13 permanent mandatory restrictions on wasteful water use activities. In addition, statewide water demand reduction requirements, such as the 20x2020 Plan and the current work being done by the California Department of Water Resources, the SWRCB, and other state agencies, implement the State's 20x2020 Water Conservation Initiative Program.

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As a result, to meet these water policy goals, the proposed project must comply with the City’s Comprehensive Water Conservation Plan, Pasadena Municipal Code Chapter 13.10, and the City’s objective to meet the 20x2020 goals by submitting a water conservation plan limiting the project’s water consumption to 80 percent of its originally anticipated demand. Through compliance with these requirements, the project would not have any individual or cumulative impacts on water supply. This plan is subject to review and approval by the PWP 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.

Because this project proposes new landscaping of 2,500 square feet or more, the project must adhere to the requirements of the Water Efficient Landscape Ordinance (Pasadena Municipal Code Chapter 13.22), which was adopted in 2010. This ordinance is a result of AB 1881, which mandates that all local jurisdictions follow specific regulations for the efficient use of water in the irrigation of landscapes. Under this ordinance, the applicant is required to prepare and submit a landscape documentation package that includes a water efficient landscape worksheet, a soil management report, a landscape design plan, an irrigation design plan, and a grading design plan to demonstrate the efficient use of water in the design of the project. The provision of 14,238 square feet of landscaped area would also provide additional permeable surface to facilitate absorption and reduce surface water runoff.

The efficient use of irrigation and plant materials is also required by Chapter 17.44, Landscaping, of the Zoning Code. As discussed in subsection 8, Energy, Issue a), the City has adopted the amended California Green Building Standards Code (Pasadena Municipal Code Section 14.04.500) for all new construction and tenant improvements.

Compliance with existing City requirements and the provision of green space would result in less than significant impacts on groundwater supplies.

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

WHY? The project site does not contain any streams, rivers, or other drainage features. Development of the site would involve some land alterations such as excavation and grading, but would not substantially alter the drainage pattern of the site or the surrounding area.

The drainage of surface water from the project would be controlled by building regulations and directed toward the existing streets, flood control channels, storm drains, and catch basins. 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. As discussed above, the proposed project is subject to NPDES requirements, including the countywide MS4 permit and the City’s SUSMP ordinance. In accordance with these requirements, the project applicant is required to submit a plan to the City that demonstrates how the project will comply with the City’s Standard Urban Stormwater Mitigation Plan. To comply with the SUSMP ordinance, the proposed project must implement best management practices that reduce water quality impacts, including erosion and siltation, to the maximum extent practicable. Compliance with the City’s SUSMP ordinance and implementation of the required BMPs would ensure that the proposed project would not result in significant erosion or siltation impacts from changes to drainage patterns.

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

WHY? As discussed, the proposed project would involve only minor changes in the site’s drainage patterns and does not involve alteration of a discernible drainage course. The proposed project’s potential to cause flooding would be eliminated through required compliance with the City’s SUSMP ordinance, which requires that post-development peak stormwater runoff rates not exceed pre-development peak stormwater runoff rates. Compliance with this SUSMP requirement would be ensured through the City’s drainage plan review and approval process.

Since the proposed project does not involve the alteration of a discernible watercourse and post-development runoff discharge rates are required to not exceed pre-development rates, the project does not have the potential to alter drainage patterns or increase runoff that would result in flooding. Therefore, the proposed project would not cause flooding and would result in less than significant impacts.

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? As discussed above in Issues c) and d), compliance with the City’s SUSMP ordinance would ensure that post-development peak stormwater runoff rates do not exceed pre-development peak stormwater runoff rates. Therefore, Pasadena’s existing storm drain system can adequately serve the proposed development.

Similarly, as discussed above in Issues a) and c), the project would generate only typical, non-point source, urban stormwater pollutants. These pollutants are covered by the countywide MS4 permit, and the project is required to comply with the City’s SUSMP ordinance. The proposed project is required to implement BMPs for erosion and sediment control and to reduce non-sediment-related pollutants from potentially leaving the construction site to the 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. As a result, impacts would be less than significant.

f. *Otherwise substantially degrade water quality?*

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

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Sediments generated on the project site shall be retained using adequate treatment control or structural BMPs, as follows:

- 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-stormwater 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.

Compliance with the both the MS4 permit and the General Construction Permit would ensure that construction of the proposed project would not substantially degrade water quality.

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

WHY? According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map for Pasadena, no portions of the City are in a 100-year floodplain. As shown on FEMA Community Map Number 065050, most of the city is located in Zone X. A few scattered areas are located in Zone D. Both Zone X and Zone D are located outside of the Special Flood Hazard Areas Subject to Inundation by the 1 percent Annual Chance of Flood (100-year floodplain), and no floodplain management regulations are required.

In addition, according to the City's Dam Failure Inundation Map (Plate 3-1 of City's General Plan Safety Element), the project is not located in a dam inundation area. No impacts would occur.

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

WHY? As discussed in Issue 12g above, no portions of Pasadena are within a 100-year floodplain identified by FEMA. As shown on FEMA Community Map 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.

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 Pasadena are within a 100-year floodplain identified by FEMA. As shown on FEMA Community Map Number 065050, most of the city is in Zone X with some scattered areas in Zone D, for which

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no floodplain management regulations are required. In addition, according to the City's Dam Failure Inundation Map (Plate P-2 of the General Plan Safety Element), 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. No impact would occur.

j. Inundation by seiche, tsunami, or mudflow?

WHY? Pasadena is not located near any inland bodies of water or the Pacific Ocean so as to be inundated by either a seiche or a tsunami. For mudflow see subsection 9, Geology and Soils, Issues a.iii) and a.iv) regarding seismic hazards such as liquefaction and landslides. No impacts would occur.

13. LAND USE AND PLANNING. Would the project:

a. Physically divide an existing community?

WHY? The project site is located in a highly urbanized area with a mix of surrounding land uses that includes residential, commercial, office, and recreational uses. The proposed project would result in the demolition of 12 buildings that are used for the Villa Esperanza campus and construction of an improved campus and would not physically alter surrounding parcels or properties. The proposed project would not adversely impact land uses in the area or act as a physical barrier in the surrounding community, as the project consists of an infill development in a highly urbanized area. Therefore, the proposed project would not physically divide an established community, and no impact would occur.

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 current General Plan land use designation for the project site is Medium Density Residential and Neighborhood Commercial; the site is zoned RM-16 and CL. The project includes a Zoning Map Amendment to change the zoning of all nine parcels included in the Master Plan project from RM-16 and CL to Public and PS. The project also includes a General Plan Amendment to change the land use designation to Institutional, which would be consistent with the current land use. The proposed project would serve only to upgrade the facilities at this existing land use and would not conflict with land use plans, policies, or regulations.

The City's General Plan Land Use Element includes a series of Guiding Principles that set forth the overall framework for developing, interpreting, and implementing the City's General Plan. The Land Use Element establishes a framework that promotes higher-density mixed-use urban environments oriented to transit and pedestrian activity in specific areas that are high quality and reflect the historic scale and character of Pasadena. The Land Use Element also identifies a series of objectives and policies targeted toward the implementation of this framework as well as all of the other Guiding Principles.

The proposed project meets the main objectives of the land use plans and ordinances governing the project site and appropriately balances the requirements of the Zoning Code with any associated development limitations of the project site. Moreover, as demonstrated throughout this Initial Study, the proposed project

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would not result in any unmitigated significant adverse environmental impacts or detract from the objectives of any plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact. Impacts would be less than significant.

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

WHY? There are no adopted habitat conservation or natural community conservation plans in Pasadena. There are also no applicable approved local, regional, or state habitat conservation plans. As a result, no impacts would occur to any applicable habitat conservation plans or natural community 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?

WHY? No active mining operations exist in Pasadena. There are two areas in the city that may contain mineral resources. These two areas are Eaton Wash, which was formerly mined for sand and gravel, and Devil's Gate Reservoir, which was formerly mined for cement concrete aggregate. The project site is not located near these areas. In addition, the project site is not located in an area known to contain mineral deposits. Neither the project site nor surrounding areas are utilized for mineral production. Implementation of the proposed project would not result in the loss of an available known mineral resource with value to the region. As such, no mineral resources impacts would occur.

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 General Plan Land Use Element does not identify any mineral recovery sites in Pasadena. Furthermore, there are no mineral resource recovery sites shown in 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 Pasadena, and mining is not currently allowed within any of the city's designated land uses. Therefore, the proposed project would not have significant impacts from the loss of a locally important mineral resource recovery site.

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 proposed project is located in an urbanized area of the city. The primary noise source in the immediate vicinity of the project site is vehicle traffic on adjacent roadways. The project would generate short-term noise due to construction activities. However, the project is required to adhere to City regulations

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governing hours of construction, noise levels generated by construction and mechanical equipment, and the allowed level of ambient noise (Chapter 9.36 of the Pasadena Municipal Code). In accordance with these regulations, construction noise would 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 City's Transportation Department and to the Zoning Administrator prior to the issuance of any permits. Adherence to established City regulations will ensure that project construction would not generate noise levels in excess of standards.

Operational, or long-term, noise sources would be limited to activity at the campus and vehicle traffic associated with the project. Noise from outdoor activity on the campus would consist primarily of vehicle noises and human voices/activity related to drop-off and pickup, parking, and outdoor play and education. However, parking and campus outdoor activities would be largely screened from surrounding uses, and drop-offs and pickup would be limited to approximately 45 minutes each time in the morning and afternoon. The proposed parking and vehicle circulation areas would be enclosed in the proposed parking garage. Similarly, the proposed outdoor play/education activity area is located within a courtyard surrounded by the campus' proposed buildings and proposed perimeter fencing. Given the location of potential noise generating uses onsite and the screening provided by the proposed campus buildings, operational noise on campus would not expose persons to excess noise levels. In regards to traffic related noise, as detailed in subsection 19, Transportation/Traffic, the proposed project is expected to contribute minimal, if any, traffic to neighboring roadways. This incremental increase would result in no perceptible change in ambient roadway noise levels. Noise impacts associated with construction and operation of the proposed project would thus be less than significant.

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 of the proposed project would require the use of construction equipment during grading, excavation, hauling, and other construction activities. The use of this type of heavy equipment could generate groundborne vibration and noise in the immediate vicinity. However, there are no construction or operational aspects of the project typically associated with significant groundborne vibration or noise levels (e.g., blasting, pile driving), and impacts are thus 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 Issue 15a above. The project would not lead to a significant permanent increase in ambient noise. The only long-term noise generated by the campus would be noise typical of an urban environment, and would include vehicle noises and human voices/activity related to drop-off and pickup, parking, and outdoor play and education. However, given the proposed location of potential noise generating uses onsite and the screening provided by the proposed campus buildings, operational noise on campus would not cause a substantial permanent increase in ambient noise levels.

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

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WHY? The project would generate short-term noise due to construction activities. However, the project will 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. A traffic and parking plan for the construction phase is required to be submitted for approval to the Traffic Engineer in the City's Transportation Department and to the Zoning Administrator prior to the issuance of any permits. Therefore, adhering to established City regulations would 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 2 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 Pasadena. The closest airport is the Burbank Bob Hope Airport (formerly the Burbank-Glendale-Pasadena Airport), which is located approximately 16 miles from the project site. 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 Pasadena, so no impacts would result.

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 proposed project involves demolition of 12 buildings associated with the Villa Esperanza campus and the development of a new campus, which includes an administration building and parking structure, two new classroom buildings, and outdoor play area in an urbanized portion of Pasadena. This type and scale of development would not result in substantial population growth and is consistent with the City's General Plan buildout projections. In addition, 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.

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

WHY? The proposed project would demolish one single-family residence (Building I) that serves as a residential care facility for six individuals. Villa Esperanza Services is in the process of looking for a new single-family residence to transfer the residential care facility license so that the residential care facility use could continue to serve the six individuals. The project would not displace a substantial number of housing units or require construction of replacement housing; therefore, the impact would be less than significant.

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

WHY? The proposed project would demolish one single-family residence (Building I) that serves as a residential care facility for six individuals who would be transferred to another residential care facility. Therefore, the project would not displace a substantial number of people or require construction of replacement housing. The impact would be less than significant.

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 proposed project will not result in the need for additional new or altered fire protection services and will not alter acceptable service ratios or response times. The proposed project consists of demolition of several older buildings that serve as a school campus and construction of a new school campus, which would be within the service area of the Pasadena Fire Department. The project site is approximately 0.4 miles west of the nearest fire station located at 2424 East Villa Street (Fire Station 32). The new structures on the project site 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. No new or expanded Fire Department facilities would be needed to serve the reconstructed campus. Therefore, the proposed project would not significantly impact fire protection services. See also subsection 11, Hazards and Hazardous Materials, Issue h) for wildfire-related impacts. The project site is located in a low wildfire hazard area according to the Wildfire Hazard Map (Plate P-2) of the City's General Plan Safety Element.

b. Libraries?

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WHY? The project is located 1.2 miles from the nearest branch library (Lamanda ParkLibrary). The city as a whole is well served by its Public Information (library) System, and the project would not significantly impact library services. The proposed project would not induce substantial population growth that could place a significant burden on Pasadena's library system. Impacts would be less than significant.

c. Parks?

WHY? The project site is located approximately 0.6 miles from the nearest park, Jefferson Park, and is approximately 0.8 miles from Victory Park. According to the City's park impact fee nexus study prepared in 2004, for every 1,000 residents, Pasadena as a whole has 2.17 acres of developed parkland and 1.49 acres of open space parkland, for a total of 3.66 acres of park and open space per 1,000 residents.

The proposed project is a nonresidential project that would not directly increase the city's population. The proposed Master Plan for the Villa Esperanza campus does not trigger a need for additional parkland or the upgrade of existing facilities, which are typically triggered by an increase in residential uses. Furthermore, the improvements proposed at the project site include recreational facilities to serve the students. As such, the proposed Master Plan would not impact the existing park system.

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 Villa Esperanza Services that would result in a net increase of 12,212 square feet of gross floor area for the Villa Esperanza campus. This expansion would marginally increase the demand on the Pasadena Police Department. However, no new or expanded police facilities would be required to serve the expanded campus while maintaining acceptable service ratios, response times, and other performance objectives. Therefore, the proposed project would not significantly impact police protection services.

e. Schools?

WHY? The proposed Master Plan would not increase the student-aged population within the Pasadena Unified School District's service area. Villa Esperanza Services provides educational opportunities for special needs individuals. The proposed project would have no adverse impact on schools.

f. Other public facilities?

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

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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?*

WHY? The project site is located approximately 0.6 miles from the nearest park, Jefferson Park, and is approximately 0.8 miles from Victory Park. According to the City's park impact fee nexus study prepared in 2004, for every 1,000 residents, Pasadena as a whole has 2.17 acres of developed parkland and 1.49 acres of open space parkland, for a total of 3.66 acres of park and open space per 1,000 residents. The City collects park impact fees for residential and nonresidential projects (Ordinance No. 6252) and uses the funds for park maintenance and improvement programs. The proposed project is a nonresidential project that would not directly increase the city's population. The Villa Esperanza School would have its own recreational facilities and urban green spaces. The proposed project would not lead to substantial population growth warranting the construction of additional park space nor the physical deterioration of any recreational facilities. Thus, impacts would be less than significant.

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

WHY? The proposed project would not involve the development of offsite recreational facilities that would have an adverse effect on the environment. No impacts would occur.

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?*

WHY? The City of Pasadena currently evaluates the performance of the circulation system using conventional standards such as intersection volume-to-capacity (V/C) ratio, level of service (LOS), and street segment volumes. The project is located along East Villa Street and is supported by a roadway network consisting of Oak Avenue, Craig Avenue, Orange Grove Boulevard, East Maple Street, East Maple Avenue, and Hill Avenue. Of these roadways, Orange Grove Boulevard and East Maple Street are principal mobility/multimodal corridors and Hill Avenue is a de-emphasized street, as identified in the Mobility Element of the City's General Plan.

The City's Transportation Department reviewed the proposed project, issued a Transportation Summary (Appendix C), and determined that no additional traffic analysis is required. This decision is in part based on the fact that the existing street system has sufficient capacity to serve the proposed project. As stated in the Transportation Summary, the students arrive on busses between 8:30 a.m. and 9:15 a.m. and depart from campus between 2:30 p.m. and 2:45 p.m. on weekdays. Current school enrollment is 85 students. With the implementation of the proposed project, enrollment could potentially reach 120 students. However, this incremental increase in student enrollment would not result in a significant increase in traffic because only

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three new vehicles are required to accommodate the potential increase in students. Additionally, the City collects a traffic reduction and transportation improvement fee to mitigate any impact from growth on city streets, including protecting neighborhoods from increased traffic. As such, the project will not result in a significant impact to the traffic load and capacity of the street system.

The City's Transportation Department also reviews a project to determine whether it is in compliance with plans and policies related to alternative modes of circulation (i.e., the Bicycle and Pedestrian Master Plans). Following their review of the project, the Transportation Department determined that the project would not conflict with such plans and would not interfere with the effectiveness of the overall circulation system. Therefore, impacts would be less than significant.

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? The Congestion Management Program (CMP) is a State-mandated program designed to address the impact of local growth on the regional transportation system. The Metropolitan Transportation Authority is the agency responsible for implementing the CMP in Los Angeles County. The CMP guidelines specify that all freeway segments where a project could add 150 or more trips in each direction during the peak hours be evaluated. The guidelines also require evaluation of all designated CMP roadway intersections where a project could add 50 or more trips during either peak hour.

The students at Villa Esperanza arrive on busses or van-pools from various surrounding school districts. The implementation of the proposed project would only result in an incremental increase (35 students) in students. Additionally, the proposed project would not increase the number of faculty members or staff. The incremental increase in student enrollment does not significantly increase the overall number of trips that would be produced in a more conventional school setting. As previously discussed, the City's Department of Transportation reviewed the proposed project, and determined that no traffic analysis was required. It is anticipated that the proposed project would not add 50 or more trips during either the AM or PM weekday peak hours to any CMP facility and would not add 150 or more trips, in either direction, during either the AM or PM weekday peak hours to a mainline freeway. Thus, due to the size of the project, a CMP analysis is not required for the proposed project. Therefore, the proposed project would not exceed, either individually or cumulatively, an established level of service standard and would have no related significant impacts.

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

WHY? The project site is not in an airport land use plan or within 2 miles of a public airport or public use airport. Therefore, the proposed project would not affect any airport facilities and would not cause a change in the directional patterns of aircraft. No impacts would occur.

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

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WHY? The proposed project would not create any safety hazards from project design features and would not introduce incompatible uses into the existing traffic pattern. All ingress and egress to the project site would be provided in compliance with the specifications of the City’s Public Works and Transportation departments to ensure that adequate visibility and safety distance are provided at these access points. No changes to existing street configurations would occur. Consequently, the proposed project would have no impact related to design hazards.

e. Result in inadequate emergency access?

WHY? A potentially significant impact would occur if the project resulted in inadequate emergency access. Site ingress and egress would comply with all building, fire, and safety codes and with final plans subject to review and approval by the City’s Public Works and Transportation departments, the Building Division, and the Fire Department. No permanent lane closures or obstructions that could impede emergency response to or from the project site from surrounding streets would occur as a result of the proposed project. Consequently, the proposed project would have a no impact related to emergency access.

f. 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 is near principal mobility corridors and de-emphasized streets, according to the Mobility Element of the General Plan. The project is located in proximity to local bus Route 40, regional MTA north-south routes along Allen Avenue, and the Gold Line light rail line connecting downtown Los Angeles to Pasadena, according to the City’s General Plan Mobility Element.

Objective 3.2.2 of the City’s General Plan Mobility Element is to “encourage non-auto travel.” The proposed project is conducive to non-auto travel, as it is located within walking distance to several bus routes and the Metro Gold Line. The proposed project would not conflict with any policies, plans, or programs promoting non-auto transportation. No impacts would occur.

20. UTILITIES AND SERVICE SYSTEMS. Would the project:

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

WHY? The proposed expansion of the campus (by 12,368 square feet) would generate approximately 2,474² gallons per day of wastewater in the form of domestic sewage (Los Angeles County Sanitation Districts 2014). Individual projects are subject to a Los Angeles County Sanitation Districts sewer connection fee when connected to a sewer line. Pasadena is in Los Angeles County Sanitation District 16. All sewage from the project site would be conveyed to existing sewer lines and facilities. Wastewater discharge would be regulated by applicable standards and requirements that are imposed and enforced by the City’s Department of Public Works, Engineering Division. All wastewater would be treated in compliance with the requirements of the LARWQCB. Therefore, the proposed project would not exceed wastewater treatment requirements of the LARWQCB, and impacts would be less than significant.

² Based on wastewater generation factor of 200 gallons flow per 1000 ft² for institutional uses (Los Angeles County Sanitation District 2014).

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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?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project consists of demolition of 30,088 square feet and development of 42,300 square feet, a net increase of 12,212 square feet of new development at the Villa Esperanza School (see Tables 2 and 3 in the Project Description) and as a result, would increase the demand for water and wastewater service. If the Master Plan is approved, the students on-site would increase from the current number of 85 to a maximum of 120 students and the campus staff would remain at 128 members.

Pasadena’s Department of Public Works, Engineering Division, maintains the local sewer system. Flows from the local system are currently carried to the trunk sewers operated by the Los Angeles County Sanitation Districts. As noted above, the proposed campus expansion would generate approximately 2,474 additional gallons of wastewater per day and would use approximately 4,800³ additional gallons of water per day. There are no existing deficiencies in the City’s collection system or the County Sanitation Districts’ collection and treatment facilities serving Pasadena. Wastewater is currently treated at the Whittier Narrows Reclamation Plant, San Jose Creek Water Reclamation Plant, and Los Coyotes Water Reclamation Plant. Because Los Angeles County Sanitation District 16 treats the City’s wastewater, the proposed project would be subject to a sewer connection fee when the project is connected to a sewer line. Connection of the main sewer lines would occur during construction and would not result in environmental impacts beyond those analyzed in this Initial Study.

In conformance with the California Green Building Program, the City has adopted an amended California Green Building Standards Code (PMC 14.04.500) for all new construction and tenant improvements. Additionally, the proposed project would be subject to the Water Waste Prohibitions and Water Supply Shortage Plans Ordinance (PMC Chapter 13.10), which imposes mandatory water conservation measures during Level 1 (least restrictive) through Level 4 (most restrictive) water supply shortages, the Water Efficient Landscape Ordinance (PMC Chapter 13.22), and the Landscaping Ordinance (PMC Chapter 17.44) to further reduce water demand and any corresponding requirement for new water facilities.

No deficiencies have been identified for the water mains and treatment facilities that currently serve the project area. In addition, as a priority project for the City’s water system identified in the current Capital Improvement Program, new and replacement water distribution mains would be installed at various locations throughout the city, which would be funded, in part, by development fees (City of Pasadena 2011a). The proposed project would also be required to pay fees to connect to the existing water mains available to serve the site.

Overall, because existing wastewater and water facilities are available to serve the proposed project and no new wastewater or water treatment facilities or expansion of existing facilities would be required, impacts would be less than significant.

c. *Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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³ Based on the maximum number of anticipated student enrollment of 120 and the total number of staff of 128 at a rate of 80 gallons of water use per person, per day (PWP 2011).

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WHY? The project would not require the construction of new stormwater 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 subsection 12, Hydrology and Water Quality, the project would involve only minor changes in the site's drainage patterns and does not involve the alteration of 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 that post-development peak stormwater runoff rates 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? Build out of the proposed Master Plan would increase the campus' water demand by approximately 4,800 gallons of water per day. Implementation of the proposed project would not demand an amount of water equivalent to or greater than a 500-dwelling-unit project and would therefore not trigger the requirement for the preparation of a water supply assessment as described in Sections 10910–10912 of the California Water Code.⁴

Over the past several years, PWP has been impacted by several factors that have restricted local and regional water supply. The 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. The City accounted for these conditions in its current Water Integrated Resources Plan (2011) and Urban Water Management Plan (2011).

Pasadena Municipal Code Chapter 13.10 establishes 13 permanent mandatory restrictions on wasteful water use activities. In addition, statewide water demand reduction requirements, such as the 20X2020 Plan and the current work being done by the California Department of Water Resources, the SWRCB, and other state agencies, implement the State's 20X2020 Water Conservation Initiative Program.

The project must comply with the City's Comprehensive Water Conservation Plan and Pasadena Municipal Code Chapter 13.10, which implement the City's water conservation and supply shortage program intended to reduce water consumption in the city and the City's service territory through conservation, enable effective water supply planning, and ensure reasonable and beneficial use of water to avoid and minimize the effect and hardship of water shortage to the greatest possible extent. Per this requirement, the project applicant will be required to demonstrate that the project will be able to reduce water consumption by a minimum of 10 percent. With submission of this plan, the proposed project would not have any individual or cumulative significant impacts on water supply. This plan would be subject to review and approval by PWP and the Building Division prior to the issuance of a building permit. The proposed project's irrigation and plumbing plans would also be required to comply with the Comprehensive Water Conservation Plan and the City's requirements for landscape irrigation.

⁴ Based on the factors presented in the Department of Water Resources' Guidebook for Implementation of SB 610 and SB 221 of 0.3 to 0.5 acre-feet per unit per year, the water demand associated with 500 dwelling units would range from approximately 134,267 to 223,767 gallons per day.

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Therefore, with compliance with existing City requirements, impacts on water supplies would be less than significant.

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? Build out of the proposed Master Plan is expected to generate approximately 2,474 additional gallons of wastewater per day. This estimated increase to wastewater service demand is negligible in comparison to the existing service area of the Los Angeles County Sanitation Districts. Wastewater from the city is currently treated at the County Sanitation Districts' Whittier Narrows Reclamation Plant, San Jose Creek Water Reclamation Plant, and Los Coyotes Water Reclamation Plant. No deficiencies have been identified in these wastewater treatment facilities. Furthermore, the proposed project would be subject to the County Sanitation Districts' sewer connection fee when the project is connected to a sewer line. The proposed project would also be subject to a Sewer Facility Charge as specified in Pasadena Municipal Code Chapter 4.53. Impacts related to the wastewater treatment capacity of the wastewater treatment plants that serve the project site would be less than significant.

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

WHY? The project is located in a developed urban area and within the City's refuse collection area. Solid waste would be collected by a private hauler and transported primarily to the Scholl Canyon Landfill, which is permitted until 2025. The Scholl Canyon Landfill has a maximum daily capacity of 3,400 tons and a total remaining capacity of 9,900,000 cubic yards (CalRecycle 2014). Because there is adequate remaining capacity to accommodate the amount of solid waste generated by the proposed project, the proposed project's impacts to landfill capacity would be less than significant.

The proposed project would be subject to Chapter 8.62 of the Pasadena Municipal Code, which is the construction demolition and waste management ordinance. Pursuant to this ordinance, the proposed project would be required to divert a minimum of 75 percent of the construction and demolition debris from the project. Additionally, the proposed project would be required to meet the standards of the California Green Building Standards Code. Proposed project impacts related to solid waste generation would be less than significant.

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 percent or better diversion rate for solid waste. The City implements this requirement through Chapter 8.61 of the Pasadena Municipal Code, which establishes the City's solid waste collection franchise system. As described in Pasadena Municipal Code Section 8.61.175, each franchisee is responsible for meeting the minimum recycling diversion rate of 75 percent on both a monthly basis and an annual basis for construction and demolition debris and 60% on a monthly basis and on an annual basis for other solid waste. The proposed project is required to comply

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with the applicable solid waste franchise's recycling system and thus would meet Pasadena's and California's solid waste diversion regulations. The project must comply with the City's Construction and Demolition Ordinance (Pasadena Municipal Code Chapter 8.62), which includes preparation of a construction waste management plan for new structures over 1,000 square feet. In addition, the project is required to comply with design requirements for refuse storage areas (Pasadena Municipal Code Section 17.40.120). Therefore, the proposed project would result in less than significant impacts related to federal, state, and local solid waste statutes and regulations.

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. No program EIR, tiering, or other process can be used for analysis of the project's environmental effects.

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 previously, the proposed project would not result in any significant impacts. As discussed in subsection 6, Biological Resources, the proposed project would have no impacts to 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 subsection 7, Cultural Resources, after mitigation the proposed project would result in less than significant impacts to historical resources, archaeological resources, and paleontological resources.

- 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? A significant impact may occur if the project, in conjunction with the related projects, would result in impacts that are less than significant when viewed separately but would be significant when viewed together. When considering the proposed project in combination with other past, present, and reasonably foreseeable future projects in the vicinity of the project site, the proposed project does not have the potential to cause impacts that are cumulatively considerable. As detailed in the above discussions, the proposed project would not result in any significant and unmitigable impacts in any environmental categories. In all cases, the impacts associated with the project are limited to the project site or are of such a negligible degree that they would not result in a significant contribution to any cumulative impacts.

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

WHY? As detailed above, implementation of the proposed project does not have the potential to result in direct or indirect substantial adverse effects to human beings. The proposed project does not approach or exceed any significance thresholds for environmental issues typically associated with indirect or direct effects to people, such as hazardous materials handling, air, water, or land pollution, or adverse effects to emergency service response.

List of Preparers

City of Pasadena

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

PROPOSED MITIGATED NEGATIVE DECLARATION

PROJECT TITLE: Villa Esperanza Master Plan

PROJECT APPLICANT: Gonzales Goodale Architects

PROJECT CONTACT PERSON: Ali Barar, Gonzales Goodale Architects

ADDRESS: 135 West Green Street, Suite 200, Pasadena, CA 91105

TELEPHONE: 626-568-1428

PROJECT LOCATION: 2116 East Villa Street
City of Pasadena
County of Los Angeles
State of California

PROJECT DESCRIPTION: The proposed project is a Master Plan to upgrade and expand existing facilities at Villa Esperanza, which is located at 2116 East Villa Street on the south side of East Villa Street between Oak and Craig Avenues, approximately 200 feet north of Interstate 210. The proposed Master Plan is a 15 year, three-phase framework for Villa Esperanza that would allow enrollment to increase from 85 to 120 students, demolition of 12 of the existing 13 structures on the site, which would total approximately 30,088 square feet demolition of gross floor area; and new construction of an administration building with two levels of parking and two, one-story classroom buildings. The three new buildings would total approximately 42,300 square feet of gross floor area. The proposed project includes a Zoning Map Amendment to change the current zoning designation of the campus from Multi-Family Residential and Commercial Limited to Public and Semi-Public, which would allow institutional uses such as the Villa Esperanza. A General Plan Amendment is also proposed to change the land use designation from Medium Density Residential and Neighborhood Commercial to Institutional, which would be consistent with the current land use.

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.

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

Completed by: Ha Ly
Title: Associate Planner
Date: July 24, 2014

Reviewed By: Laura Dahl
Title: Senior Planner
Date: July 24, 2014

PUBLIC REVIEW PERIOD: July 24, 2014 to August 13, 2014

COMMENTS RECEIVED ON DRAFT: Yes No

INITIAL STUDY REVISED: Yes No

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