

RESOLUTION NO. \_\_\_\_\_

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PASADENA  
CERTIFYING THE SUSTAINABLE COMMUNITIES ENVIRONMENTAL  
ASSESSMENT (SCH NO. 2018021017) FOR 3200 EAST FOOTHILL BOULEVARD  
MIXED USE PROEJCT, AND ADOPTING ENVIRONMENTAL FINDINGS AND A  
MITIGATION MONITORING AND REPORTING PROGRAM**

**WHEREAS**, the 3200 Foothill Boulevard Mixed Use Project (the “project”) proposes the development of two parcels (identified as Assessor Parcel Numbers [APN] 5752-023-039 and 5752-023-044), generally located at 3200 E. Foothill Boulevard, one located on the south side of East Foothill Boulevard, between North Kinneloa Avenue and Sierra Madre Villa Avenue in East Pasadena and one located on the south side of East Foothill Boulevard between North Kinneloa Avenue and the I-210 freeway. Development would only occur on the site east of North Kinneloa Avenue. The site west of North Kinneloa Avenue is envisioned for non-programmed passive recreational use. The project site east of North Kinneloa Avenue encompasses 8.32 acres (362,498 square feet [SF]). The project involves demolition of the 29 existing buildings on the project site and construction of eight separate mixed-use buildings, subterranean and above-ground parking structures, and landscaping. A total of 550 apartment dwellings (481 market rate dwellings, 23 dwellings for moderate income families, and 46 dwellings for low income families) and 9,800 SF of retail/restaurant space would be distributed within the buildings. The proposed dwelling unit mix includes 165 studio units, 165 one-bedroom units, 192 two-bedroom units, and 28 3-bedroom units; the average dwelling unit site would be approximately 800 SF. Buildings 1, 2 and 3 would each be four-story structures and Buildings 4 through 8 would each be five-story structures. All buildings would have a maximum height of 60 feet. A two-level subterranean parking structure would be located on the north side of the property along Foothill Boulevard, and a five-level above grade parking structure would be located along the rear of the property along the 210 Freeway. Approximately two acres of combined open space would be provided on-site and recreational and open space amenities would include a mix of public and private spaces, consisting of a public park in the center portion of the site, two courtyards, a dog park, a paseo, a fitness center, two clubhouses, and a retail/restaurant court. The project boundary also includes a 0.21-acre (9,148 SF) accessory site at the southwest corner of the site on the west side of Kinneloa Avenue. This site is envisioned for non-programmed passive recreational use.

The project requires the following discretionary actions of the City of Pasadena: (1) a Zoning Map Amendment to change the Zoning Designation from EPSP-d1-IG to PD; (2) a Public Tree Removal Permit to allow the removal of 17 street trees along Foothill Boulevard and Kinneloa Avenue; and (3) a Design Review Permit to approve the project



design for consistency with the Zoning Code and Design Guidelines. In addition, the project site requires approval of a Removal Action Workplan (RAW) by the Department of Toxic Substances Control (DTSC) to allow for the removal of on-site contaminants to levels protective of human health and the environment; and

**WHEREAS**, the City of Pasadena is the lead agency for the project pursuant to the California Environmental Quality Act ("CEQA," Cal. Pub. Res. Code §21000 *et seq.*), State CEQA Guidelines (the "Guidelines," 14 Cal. Code Regs. §15000 *et seq.*), and the City's local environmental policy guidelines; and

**WHEREAS**, pursuant to CEQA Guidelines Section 15063, the City prepared a Sustainable Communities Environmental Assessment (the "SCEA") for the project. The Draft SCEA concluded that there was substantial evidence that the project might have a significant environmental impact on the following resource areas: (1) Air Quality, (2) Biological Resources, (3) Cultural Resources, (4) Hazards and Hazardous Materials, (5) Noise, (6) Transportation and Traffic, and, (7) Tribal Cultural Resources; and

**WHEREAS**, pursuant to Public Resources Code section 21092, the City provided a public Notice of Completion and Availability ("NOA") of the Draft SCEA (State Clearinghouse No. 2018021017) on February 8, 2018 through mailing to all property owners within 500 feet of the Project. The NOA also gave notice of a public hearing (Planning Commission Hearing) on February 28, 2018 at which comments on the Draft SCEA would be taken. Copies of the Draft SCEA were also placed at the City's Planning and Community Development Department at 175 North Garfield Avenue, at the Central Library at 285 East Walnut Street, at the Hill Avenue Branch Library, 55 S. Hill Avenue, and on the City's website; and

**WHEREAS**, the Draft SCEA was circulated, together with technical appendices, to the public and other interested persons for a 30-day public comment period, from February 8, 2018 to March 9, 2018. During the comment period, the City held a duly noticed public meeting before the Planning Commission on February 28, 2018 at which the public was given the opportunity to provide comments on the Draft SCEA. On March 9, 2018, the comment period was extended to March 26, 2018; and

**WHEREAS**, during the aforementioned public comment periods the City received written and oral comments on the Draft SCEA, and consulted with all responsible and trustee agencies, and other regulatory agencies pursuant to CEQA Guidelines Section 15086; and

**WHEREAS**, after reviewing the comments and the revisions to the Draft SCEA, the City concludes that the information and issues raised by the comments did not



constitute new information requiring recirculation of the Draft SCEA, as defined in CEQA Guidelines Section 15088; and

**WHEREAS**, the City Council held a duly noticed public hearing on the SCEA and the project on July 9, 2018; and

**WHEREAS**, the findings made in this resolution are based upon the information and evidence set forth in the SCEA and upon other substantial evidence that has been presented at all public meetings regarding the project and in the record of the proceedings. The documents, staff reports, technical studies, appendices, plans, specifications, and other materials that constitute the record of proceedings on which this resolution is based are on file and available for public examination during normal business hours in the Planning & Community Development Department at 175 North Garfield Avenue, Pasadena, California 91101 and with the Director of Planning & Community Development, who serves as the custodian of these records; and

**WHEREAS**, the City Council finds that agencies and interested members of the public have been afforded ample notice and opportunity to comment on the SCEA and that the comment process has fulfilled all requirements of State and local law; and

**WHEREAS**, the City Council, as the decision-making body for the lead agency with regard to this project, has independently reviewed and considered the contents of the SCEA and all documents and testimony in the record of proceedings prior to deciding whether to certify the SCEA; and

**WHEREAS**, all other legal prerequisites to the adoption of this Resolution have occurred.

**NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF PASADENA RESOLVES AS FOLLOWS:**

**I. FINDINGS REGARDING TRANSIT PRIORITY PROJECT**

As set forth in the SCEA, the Project is a Transit Priority Project in that it (a) contains at least 50 percent residential use, based on total building square footage, (b) provides a net density of at more than 20 units per acre; and c) is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

The City Council finds that the Project is consistent with the use designation, density, building intensity, and applicable policies specified for the project area in Southern California Association of Government's (SCAG's) 2016-2040 RTP/SCS (RTP/SCS). Specifically, the City Council finds that the RTP/SCS identifies various "Land Development Categories" and "Place Types" that were developed by SCAG to describe the general conditions that exist and/or are likely to exist within a specific area, reflecting the diversity of land use planning in the region. The Council further finds that the "City Residential" place type within the "Urban" land development category is the most applicable to the Project. The "Urban" land development category is found within and directly adjacent to moderate and high density urban centers. The majority of housing in this development category is multi-family residential development, and "Urban" areas are supported by high levels of regional and local transit service. As described in the Place Types Summary reference document of the RTP/SCS, "City Residential" districts are exemplified by mid- and high-rise residential structures between five and 40 stories tall with some ground-floor retail space, and structured parking either above or below ground. Workers, residents, and visitors are well-served by transit, and can walk or bicycle for many of their transportation needs.

## **II. RESOLUTION REGARDING CERTIFICATION OF THE SCEA**

Pursuant to State CEQA Guidelines Section 15090, the City Council certifies that: (1) it has reviewed and considered the SCEA prior to approving the project, (2) the SCEA is an accurate and objective statement that fully complies with CEQA, the State CEQA Guidelines, the City's local environmental guidelines, and (3) the SCEA reflects the independent judgment of the lead agency. The City Council approves the SCEA based on the findings and conclusions herein.

The City Council finds that the additional information provided in the staff report, in the comments (and any responses thereto) received after circulation of the Draft SCEA, in the evidence presented in written and oral testimony presented at public meetings, and otherwise in the administrative record, does not constitute new information requiring recirculation of the SCEA under CEQA. None of the information presented to the City Council after circulation of the Draft SCA has deprived the public of a meaningful opportunity to comment upon a substantial environmental impact of the project or a feasible mitigation measure or alternative that the City has declined to implement.



### **III. RESOLUTION REGARDING ENVIRONMENTAL IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT WITHOUT MITIGATION**

The City Council finds that the proposed project will have no impact or a less than significant impact without mitigation on a number of environmental topics. For some of these topics, compliance with applicable regulatory requirements is assumed, as discussed in the SCEA, which would ensure that impacts remain less than significant. Environmental topics determined to be less than significant without mitigation are listed below. For each topic, the discussion begins with a delineation of the potential impacts evaluated in the SCEA, as specifically related to that topic, along with page citations as to where in the SCEA the relevant discussion is found, and is followed by an explanation of the substantial evidence in support of the SCEA conclusion that a significant impact would not occur.

#### **a. Aesthetics**

##### **i. Potential Impacts Evaluated**

- Would the project have a substantial adverse effect on a scenic vista? (SCEA, p. 43)
- Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- Would the project substantially degrade the existing visual character or quality of the site and its surroundings?
- Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

##### **ii. Proposed Mitigation – None Required**

##### **iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

Per the regulations provided in SB 743, for residential, mixed-use residential, and employment center projects on infill sites in Transit Priority Areas (TPAs), aesthetic impacts cannot be considered significant. Therefore, the discussion regarding aesthetic impacts was provided for informational purposes only. As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to these aspects of aesthetics. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.



#### **iv. Supporting Explanation**

The project site lies in an urbanized portion of Pasadena where views of important scenic resources are largely limited to north–south roadway corridors that afford views of the San Gabriel Mountains to the north. However, as the proposed developments would obstruct mountain views in a manner similar to adjacent existing development and other nearby valuable views of the mountain backdrop would remain unaffected, the proposed project would not have a substantial adverse impact on a scenic vista.

The project site is not within the viewshed of the nearby scenic highways, Angeles Crest Highway or the Arroyo Seco Historic Parkway. Therefore, the proposed project would have no impacts on state scenic highways or scenic roadway corridors.

The most prominent views of the site would be from Foothill Boulevard along the northern boundary. Views during construction would be limited and temporary in nature, and would cease upon completion. Therefore, project construction would not substantially degrade the visual character or quality of the site or surroundings. In regard to long term operation the project, the proposed design is a contemporary architectural style that would blend with the variety of styles that currently characterize the surrounding area. Since the proposed project is consistent with the surrounding uses in terms of height, mass, use, and architectural style, the project would not substantially degrade the visual character or quality of the site or surroundings.

#### **b. Agriculture and Forestry Resources**

##### **i. Potential Impacts Evaluated**

- Would the project convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (SCEA, p. 47)
- Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?
- Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section



4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

- Would the project result in the loss of forest land or conversion of forest land to non-forest use?
- Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

**ii. Proposed Mitigation – None Required**

**iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to these aspects of agricultural and forestry resources. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

**iv. Supporting Explanation**

The City of Pasadena is a developed urban area surrounded by hillsides to the north and northwest. 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 Natural Resources Agency. No impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur as a result of the proposed project.

The City of Pasadena has no land zoned for agricultural use other than commercial growing areas. The project site is located in the East Pasadena Specific Plan area, zoned IG-SP-2 (South Fair Oaks Specific Plan, General Industrial). While commercial growing is permitted in the IG zone, there are no agricultural uses within the project site or surrounding area. Additionally, the City has no Williamson Act contract land. Therefore, no impacts would occur.

Pasadena has no timberland or timberland production land and has no land zoned for forest land. Therefore, no impact to forest land or timberland would occur as a result of the proposed project.



As discussed above, there is no known farmland in the City of Pasadena. Therefore, the proposed project would not result in the conversion of farmland to a nonagricultural use.

**c. Air Quality**

**i. Potential Impacts Evaluated**

- Would the project conflict with implementation of the applicable air quality plan? (SCEA, p. 49)
- Would the project expose sensitive receptors to substantial pollutant concentrations?
- Would the project create objectionable odors affecting a substantial number of people?

**ii. Proposed Mitigation – None Required**

**iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to this aspect of air quality. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

**iv. Supporting Explanation**

A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. As discussed, the 2016 AQMP relies on local city general plans' and the Southern California Association of Government's (SCAG) Regional Transportation Plans' (RTP) forecasts of regional population, housing and employment growth in its own projections for managing Basin air quality.

The proposed project involves the construction of 550 apartment units, 9,800 SF of commercial space, and open space/recreation areas. While the project may provide new residences and employment opportunities in the City of Pasadena that could contribute to population growth, this contribution would be nominal. According to an employee density study prepared for SCAG in 2001, retail uses in Los Angeles County employ on average one employee per 511 SF of retail use. Thus, the proposed project



is expected to employ approximately 19 persons (1 employees/511 SF x 9,800 SF) (SCAG 2001). According to data provided by the California Department of Finance (DOF), the estimated population for the City of Pasadena on January 1, 2017 was 143,333 (California DOF 2017). Based on the SCAG average household rate of 2.5 persons per household for the City of Pasadena, the proposed project would generate an on-site population of approximately 1,375 (SCAG 2017). In its 2016 RTP/SCS, SCAG projects that the City's population will increase to 150,700 by 2040—an increase of 7,367 persons relative to 2017 (SCAG 2016b). Assuming that all project employees would move to reside in the City, which is a conservative assumption given the connected nature of the region, the project would constitute 19 percent of projected City growth (employees + residents = 1,394, which is 19 percent of 7,367). Therefore, the level of population growth associated with the project was anticipated in SCAG's long-term population forecasts and would not exceed official regional population projections. The project would be consistent with the AQMP and impacts would be less than significant.

Certain population groups, such as children, the elderly, and people with health problems, are particularly sensitive to air pollution. Sensitive receptors are defined as land uses that are more likely to be used by these population groups and include health care facilities, retirement homes, school and playground facilities, and residential areas. As shown in Table 6 of the SCEA, *SCAQMD LST Screening Thresholds for Construction*, construction of the proposed project would not generate emissions that exceed LSTs. (SCEA, p. 52). Localized air quality impacts related to CO hot spots would not occur. Impacts from pollutant concentrations would be less than significant. Additionally, long-term TAC emissions would be nominal. Overall, TAC emissions from construction and operational activities would be less than significant.

The SCAQMD's 1993 *CEQA Air Quality Handbook* identifies land uses associated with odor complaints to be agriculture uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. Mixed-use projects involved residential and commercial uses are not identified on this list. Although odors from equipment may be generated during construction activities, these odors would be short-term and would only occur during the construction period. In addition, the project would have to comply with SCAQMD Rule 402, which prohibits the discharge of air contaminants that would cause injury, detriment, nuisance, or annoyance to the public. Therefore, the proposed project would not generate objectionable odors affecting a substantial number of people. Impacts would be less than significant.



#### **d. Biological Resources**

##### **i. Potential Impacts Evaluated**

- Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? (SCEA, p. 65)
- Would the project have a substantial adverse effect on 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?
- Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

##### **ii. Proposed Mitigation – None Required**

##### **iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to this aspect of biological resources. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

##### **iv. Supporting Explanation**

The project is not located near any of these natural habitat areas and the project site and surrounding area do not include any vegetation that constitutes a plant community. Existing vegetation on-site is limited to immature ornamental trees and nonnative landscaping. No riparian habitat or other sensitive natural communities exist in the project area as identified in local or regional plans or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.



The project site is located in an urbanized area and does not include any discernable drainage courses, inundated areas, wetland vegetation, or hydric soils, and thus does not include USACE jurisdictional drainages or wetlands. There are no federally protected waters or wetlands, as defined by Section 404 of the Clean Water Act, on the site. No water features or other topographic depressions are present on the site that could support wetlands.

The project site contains street trees lining Foothill Boulevard and Kinneloa Avenue, all of which are proposed for removal. However, tree removal activities under construction of the proposed project would be conducted in accordance with the removal procedures stipulated in the ordinance, which include acquiring a tree removal permit and giving adequate notice of tree removal activities. Therefore, with compliance with the City Tree Protection Ordinance the proposed project would not conflict with any local policies or ordinances protecting biological resources.

There are no adopted Habitat Conservation or Natural Community Conservation Plans in the City of Pasadena. There are also no approved local, regional, or state habitat conservation plans. (SCEA, p. 71-73)

#### **e. Cultural Resources**

##### **i. Potential Impacts Evaluated**

- Would the project disturb any human remains, including those interred outside of formal cemeteries? (SCEA, p. 94)

##### **ii. Proposed Mitigation – None Required**

##### **iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to this aspect of cultural resources. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

##### **iv. Supporting Explanation**

While not anticipated, the potential for the recovery of human remains during ground-disturbing activities cannot be precluded, as discussed in the SCEA. Human burials outside of formal cemeteries often occur in prehistoric archaeological contexts. Human burials, in addition to being potential archaeological resources, have specific

provisions for treatment in Section 5097 of the California Public Resources Code. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the county coroner must be notified immediately. If the human remains are determined to be prehistoric, the coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. In the event that human remains are encountered during project construction activities, the proposed project would be required to comply with these regulations. Compliance would ensure that potential impacts to such resources would be reduced to a less than significant level. In addition, the proposed project would also be required to comply with mitigation measure MM-CUL-4(b) of SCAG's 2016 RTP/SCS EIR regarding protection of human remains. (SCEA, p. 94)

**f. Energy**

**i. Potential Impacts Evaluated**

- Would the project conflict with adopted energy conservation plans?
- Would the project use non-renewable resources in a wasteful and inefficient manner? (SCEA, p. 97)

**ii. Proposed Mitigation – None Required**

**iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to greenhouse gases. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

**iv. Supporting Explanation**

The Project would comply with the applicable regulatory requirements for the design of new buildings, including the provisions included in the 2016 CALGreen Code and California's Building Energy Efficiency Standards, and the City of Pasadena Green Energy Building Standards.



In order to promote energy conservation, the City has adopted an amended California Green Building Standards Code per PMC Section 14.04.010. In conformance with the City's Building Code, the project would be designed to comply with the performance levels of an amended California Green Building Standards Code, which would reduce energy consumption compared to standard building practices. Because the project includes 550 multi-family residential dwellings and 9,800 SF of ground floor retail, it is required to comply with the code's mandatory measures.

The proposed project would be also consistent with goals and policies included in the 2016 RTP/SCS, which focus on creating livable communities with an emphasis on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing the use of renewable resources. The project site is well served by existing public transportation, including Pasadena Transit and METRO bus and rail lines. The proposed mix of retail and multi-family housing within a HQTAs and Transit Priority Area is consistent with the numerous policies in the 2016-2040 RTP/SCS that focus on locating new jobs and housing near transit, which would serve to reduce the consumption of electricity, natural gas, and petroleum based fuel associated with VMT. Therefore, the project would not conflict with adopted energy conservation plans or violate state or federal energy standards. Impacts would be less than significant.

The proposed project would involve the use of energy during the construction and operational phases of the project. Energy use during the construction phase would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting, and electricity use to bring water to the site for fugitive dust control. In addition, temporary grid power may also be provided to any temporary construction trailers or electric construction equipment. Long-term operation of the proposed project would require permanent grid connections for electricity and natural gas service to power internal and exterior building lighting, and heating and cooling systems.

The available electricity depends upon adequate generation capacity and fuel supplies. PWP estimates that electrical consumption within PWP's planning area will be approximately 1,320 GWh by 2030 (KPFF 2017). Based on the 2016 California Gas Report, it is estimated that the natural gas consumption within the SoCalGas' service area will be 2.32 billion cubic feet/day in 2030. Therefore, the proposed project would account for an incremental percentage of the demand forecasted for the PWP and SoCalGas service area. Moreover, as discussed above, the project would incorporate a variety of energy conservation measures to reduce usage. Additionally, the project would implement any necessary connection upgrades required to ensure that PWP and SoCalGas existing and planned service would be sufficient to support the project's



incremental net increase in demand for electricity and natural gas. Therefore, construction and operation of the project would not result in demand for electricity and natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Further, the Project would not use non-renewable resources in a wasteful and inefficient manner. Impacts would be less than significant. (SCEA, p. 97-102)

## **g. Geology and Soils**

### **i. Potential Impacts Evaluated**

- Would the project expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving:
  - 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?
  - Strong seismic ground shaking?
  - Seismic-related ground failure, including liquefaction?
  - Landslides?
- Would the project result in substantial soil erosion or the loss of topsoil?
- Would the project be located on a geologic unit or soil that is made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?
- Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
- Would the project 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? (SCEA, p. 103)

**ii. Proposed Mitigation – None Required**

**iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to this aspect of hazards and hazardous materials. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

**iv. Supporting Explanation**

While the project site is located in the seismically active region of Southern California, according to the DOC fault activity map for the Mount Wilson quadrangle, the project site is not located on or adjacent to any of these potential fault rupture zones and the closest mapped zone, the Raymond fault zone, is 1.2 miles south of the project site. Therefore, the proposed project would not expose people or structures to potential substantial adverse effects caused by the rupture of a known fault. In addition, structures developed under the proposed project would be required to comply with California Building Code (CBC) standards, which include specific structural seismic safety provisions, and therefore would have minimized risk of earthquake damage. The structures would also be subject to inspection during construction. Further, Program S3-1 of the Safety Element of the City General Plan states that the City will enforce the seismic design provisions for Seismic Zone 4 of the CBC. In general, compliance with CBC standards for seismically-induced ground shaking will ensure the proposed project would minimize the risk of exposure to hazards associated with seismic ground shaking and impacts would be less than significant.

The nearest liquefaction zone is located approximately 0.4 mile south of the project site and the project site is also not shown to be in proximity to areas of historic liquefaction conditions. Nonetheless, development facilitated by the proposed project would be built in compliance with CBC requirements for new construction to withstand potential liquefaction hazards. Further, the proposed project would be subject to mitigation measure MM-GEO-1(b) of the SCAG's 2016 RTP/SCS EIR, which would require compliance with the building and safety standards provided in the Pasadena Municipal Code. The nearest landslide hazard area is approximately 1.2 miles north of the project site. Therefore, the project will have no impacts from seismic-induced landslides. (SCEA, p. 104-105)



Construction of the proposed project may temporarily expose soils on-site to wind and/or water erosion. However, construction activities would be required to comply with regulations for controlling on-site erosion and fugitive dust. Further, in accordance with Clean Water Act and National Pollutant Discharge Elimination System (NPDES) requirements, water erosion during construction would be minimized by limiting construction to dry weather, covering exposed excavated dirt during periods of rain, and protecting excavated areas from inundation with temporary barriers and/or berms. In (SCEA, p. 105)

Long-term operation of the proposed project would not result in substantial soil erosion or loss of topsoil, as the majority of the project site would be covered by the proposed residential structures, aboveground parking lot, and associated paved surfaces. Soil erosion after construction would be controlled by implementation of an approved landscape and irrigation plan as required by the grading plan. With the required compliance with SCAQMD rules, NPDES, and the City's Municipal Code, potential impacts associated with erosion during project construction and operation would be less than significant. (SCEA, p. 106)

An acceptable degree of soil stability can be achieved from CBC-required incorporation of soil standards and treatments to address site-specific conditions. Overall, modern engineering practices and compliance with established building standards, including the CBC, would ensure the project would not cause any significant impacts from unstable geologic units or soils. Additionally, 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. Modern engineering practices and compliance with established building standards, including the CBC, would ensure the project would not cause any significant impacts related to unstable geologic units or expansive soils. In addition, the project would be required to connect to the existing sewer system. Therefore, soil suitability for septic tanks or alternative wastewater disposal systems is not applicable in this case. No impact would occur. (SCEA 107-108)

## **h. Greenhouse Gas Emissions**

### **i. Potential Impacts Evaluated**

- Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?



- Would the project conflict with any applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases? (SCEA, p. 109)

**ii. Proposed Mitigation – None Required**

**iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to greenhouse gas emissions. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

**iv. Supporting Explanation**

Table 14 in the SCEA (p. 113) combines the construction and operational emissions associated with development of the project minus operational emissions of the existing storage facility. Pursuant to CEQA Section 21159.28(a), this analysis does not consider mobile emissions when calculating total project emissions, because the potential environmental effects of these emissions have been addressed in previous regional environmental documentation. However, the proposed project's mobile emissions can be found in Appendix C for informational purposes.

As discussed in Section 3, *Air Quality* of the SCEA, the proposed project is expected to employ approximately 19 persons (1 employees/511 SF x 9,800 SF) (SCAG 2001) and house 1,375 persons (SCAG 2017) for a total service population of 1,394. As shown in Table 14 of the SCEA, annual emissions from the proposed project would total approximately 2.2 MT of CO<sub>2</sub>e and would not exceed the project-specific per service person emissions threshold of 4.4MT of CO<sub>2</sub>e per year. Impacts would be less than significant.

The SCEA discusses several "Regional Regulations" and "Local Regulations", plans, and policies that have been adopted to reduce GHG emissions in the Southern California region and City of Pasadena. Specifically, SCAG's 2016-2040 RTP/SCS provides transportation and growth strategies to reduce regional emissions and the City's 2006 Green City Action Plan has a number of goals that support RTP/SCS goals and otherwise reduce GHG emissions. The City of Pasadena is currently drafting a CAP, but it has not yet been released to the public or adopted. Table 15 of the SCEA (p. 115) shows the project's consistency with applicable regional goals and policies and Table 16 (p. 116) shows the project's consistency with applicable local goals and actions. As demonstrated below, the project would be consistent with goals and policies



to reduce GHG emissions set forth in the 2016-2040 SCAG RTP/SCS and 2006 Green City Action Plan. Furthermore, the project would be constructed in accordance with the California Green Business Standards, which require energy efficiency, water efficiency, and material conservation and resource efficiency. Therefore, the project would not conflict with any plan, policy, or legislation related to GHG emissions. Impacts would be less than significant.

#### **i. Hazards and Hazardous Materials**

##### **i. Potential Impacts Evaluated**

- Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?
- For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- 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?
- Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- 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? (SCEA, p. 120)

##### **ii. Proposed Mitigation – None Required**

##### **iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to hazards and hazardous materials. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

#### **iv. Supporting Explanation**

The Project site is not located within one-quarter mile of an existing or proposed school. The nearest schools to the project site include Walden School approximately 0.5 miles to the southwest, Wilson Middle School approximately 0.5 miles to the south, and Assumption of the BVM Elementary School approximately one-mile northwest. The proposed project operations do not involve hazardous emissions or acutely hazardous materials that would pose a potential health hazard. As stated above, the storage, transportation, use, and disposal of any project-related hazardous materials would comply with applicable standard construction practices administered by federal, state, and local agencies, such that hazardous emissions or handling of hazardous materials, substances, or waste would be minimized. Thus, a less than significant impact would occur in this regard. (SCEA, p. 124)

The project site is not located within the vicinity of a private airstrip, nor is it located within an airport land use plan or within two miles of a public airport or public use airport. The nearest public use airports are the El Monte Airport and the Hollywood Burbank Airport (formerly the Bob Hope Airport) in Burbank, which are located approximately 5.4 miles east and 12 miles northwest of the project site, respectively. The proposed project would not result in a safety hazard for people residing or working in the vicinity of an airport or private air strip.

The City of Pasadena Emergency Operations Plan (EOP) addresses the City's planned response to emergencies associated with natural disasters and technological incidents. It provides an overview of operational concepts, identifies components of the City's emergency management organization within the Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS), and describes the overall responsibilities of the federal, state, and county entities and the City for protecting life and property and ensuring the overall well-being of the population. Further, the City maintains a SEMS/NIMS Emergency Response Plan, which addresses planned responses to emergency/disaster situations associated with natural disasters, technological incidents, and national security emergencies. The Pasadena Fire Department provides disaster preparedness materials and information on their website. In case of a disaster, the Pasadena Fire Department is responsible for implementing their advised disaster policies, and the Pasadena Police Department devises evacuation routes based on the specific circumstance of the emergency. The City has preplanned evacuation routes for dam inundation areas associated with Devil's Gate Dam and Eaton Wash.



The construction and operation of the proposed project would not place any permanent or temporary physical barriers on any existing public streets. Additionally, all construction staging would not interfere with circulation along East Foothill Boulevard, Kinneloa Avenue, Santa Paula Avenue, or Sierra Madre Villa Avenue, or any other nearby roadways. Therefore, the proposed project would not be expected to interfere with any emergency response or emergency evacuation plans. Prior to the issuance of a building permit, the applicant is required to submit appropriate plans for plan review to ensure compliance with zoning, building, and fire codes. Adherence to these requirements ensures that the project would not have a significant impact on emergency response and evacuation plans. Therefore, a less than significant impact would occur.

As shown on the General Plan Safety Element Plate P-2, the project site is not located in an area of moderate or very high fire hazard. The project site is located within an urbanized area and the surrounding area is 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. No impacts would occur. (SCEA, p. 129-130)

## **j. Hydrology and Water Quality**

### **i. Potential Impacts Evaluated**

- Would the project violate any water quality standards or waste discharge requirements?
- Would the project 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 that would not support existing land uses or planned uses for which permits have been granted)?
- Would the project 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 that would result in substantial erosion or siltation on- or off-site?
- Would the project substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

- Would the project create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
- Would the project otherwise substantially degrade water quality?
- Place housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map?
- Place structures in a 100-year flood hazard area that would impede or redirect flood flows?
- Expose people or structures to a significant risk of loss, injury, or death involving flooding, including that occurring as a result of the failure of a levee or dam?
- Result in inundation by seiche, tsunami, or mudflow? (SCEA, p. 131)

**ii. Proposed Mitigation – None Required**

**iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to this aspect of hydrology and water quality. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

**iv. Supporting Explanation**

Pasadena lies 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). Compliance with the SQMP is enforced by application of Section 402 of the Clean Water Act, the NPDES. Under this section, municipalities are required to obtain Municipal Separate Storm Sewer Systems (MS4) permits for the water pollution generated by stormwater in their jurisdiction. 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. The County adopted the latest MS4 permit in November 2012 (with amendments in 2013 and 2015), which requires all new development to include low-impact development (LID) techniques in lieu of the SQMP. The proposed development meets the City's SUSMP requirement thresholds (i.e., a



commercial addition greater than 5,000 SF, housing project with over 10 units) and the applicant is required to submit and implement a SUSMP compliance plan. The applicant's Hydrology Study (Fusco Engineering 2016) and preliminary grading design includes Low Impact Development (LID) stormwater Best Management Practices (BMPs) that will meet the water quality performance criteria specified in the Los Angeles County MS4 Permit. Therefore, the proposed project would not violate any water quality standards or waste discharge requirements, and would have less than significant impacts on water quality.

The 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 water usage would be negligible in comparison to the overall water service provided by the PWP and would not change the amount of water that PWP withdraws from the Raymond Basin.

Through compliance with the above requirements, the project would not have any individual or cumulative impacts on water supply. Plans regarding water use of the proposed project would be 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 efficient landscape irrigation and drought tolerant plant material as required by Chapter 17.44, Landscaping, of the Zoning Code. Compliance with existing City requirements would result in less than significant impacts on groundwater supplies.

The project site does not contain any streams, rivers, or other drainage features. Development of the site would involve excavation and grading, but would not substantially alter the drainage pattern of the site or surrounding area as a majority of the site would be paved similar to existing conditions. As the majority of the site would remain impervious, drainage patterns would remain similar to existing conditions and drainage outfall locations would remain. 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 in the SCEA (p. 132), the proposed project is subject to NPDES requirements, including the countywide MS4 permit and the City's SUSMP ordinance. The applicant has integrated rainwater harvesting drainage structures into the overall plan for drainage, which demonstrates compliance with the City's SUSMP. Complying with the City's SUSMP ordinance and implementing the required BMPs/LID techniques



would ensure that the proposed project would result in less than significant erosion or siltation impacts due to changes to drainage patterns, and 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.

Since the project does not involve alteration of a discernable watercourse and post-development runoff discharge rates would not exceed predevelopment rates, the proposed project would 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. (SCEA, p. 135)

The proposed project 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 set of BMPs for construction sites in Los Angeles County, as shown in Table 17 of the SCEA (p. 136). Complying with the MS4's construction site requirements as well as the City's SUSMP ordinance and LID requirements would ensure that construction of the proposed project would not substantially degrade water quality.

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), no portions of the City of Pasadena are within a 100-year floodplain. The project site is located Zone X which is 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 the City's General Plan Safety Element [Pasadena 2002b]) the project is not located in a dam inundation area. . In addition, according to the City's Dam Failure Inundation Map (Plate P-2 of the City's General Plan Safety Element) the project is not located in a dam inundation area. Therefore, the project would have no impacts related to exposing people or structures to flooding risks, including flooding as a result of the failure of a levee or dam.

The City is not located near any inland bodies of water or the Pacific Ocean so as to be inundated by either a seiche or tsunami. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity. The project site would not be susceptible to mudflow due to its relatively flat geography and distance from hillside soils. No impact would occur in this regard. (SCEA, p. 137)



## **k. Land Use and Planning**

### **i. Potential Impacts Evaluated**

- Would the project physically divide an established community?
- Would the project 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, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
- Would the project conflict with an applicable habitat conservation plan or natural community conservation plan? (SCEA, p. 139)

### **ii. Proposed Mitigation – None Required**

### **iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to land use and planning. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

### **iv. Supporting Explanation**

The site currently consists of a self-storage facility, and the proposed project would construct new residential, retail, and shared public and private open space uses. The proposed project would not physically divide an existing community but, rather, would facilitate the development of a new community within the area. Further, development included in the proposed project would be compatible with existing surrounding uses, as similar development including residential apartments a hospital, and various retail establishments are located to the north and east of the project site. Therefore, no impacts would occur.

The primary land use planning documents that govern the project site are the City's General Plan, the East Pasadena Specific Plan, and the Pasadena Zoning Code. The paragraphs below evaluate the project's consistency with these documents.

The General Plan Land Use Element designates the project site Medium Mixed Use. This designation is intended to support development of multi-story buildings with a



variety of compatible uses including work/live units and ground floor retail and restaurant uses with office and/or residential uses above. . Development of the proposed project which would include 550 apartments, 9,800 SF of retail uses, and approximately two acres of combined open space would be consistent with the Land Use Element of the General Plan.

The East Pasadena Specific Plan, adopted in October 2000, promotes new development that balances the needs of residential and commercial uses while preserving the quality of life in the area in terms of existing air quality, traffic, safety, and sense of community. For development within Subarea d2 of the Specific Plan Area, the goals of the plan include: encouraging additional industrial and office development with a limited amount of supporting retail/commercial development, encouraging the development of child care facilities, creating innovative housing developments through mixed-use and live-work projects, and creating housing opportunities within the district by providing for live-work housing and mixed-use development in appropriate areas (City of Pasadena 2011). The proposed project would be consistent with these goals by replacing an existing self-storage facility with a new mixed-use development that would residential, retail and open space land uses. Development would include 550 residential dwellings, including live-work spaces, supporting retail, public open space, and two parking structures. The proposed project also supports alternative modes of transportation as it is within close proximity to and would be served by multiple public transit services, such as the Metro Gold Line and Pasadena Area Rapid Transit System. The proposed project would therefore be consistent with the relevant goals of the East Pasadena Specific Plan.

The proposed project is located in the East Pasadena Specific Plan zoning district with General Industrial and General Commercial zoning designations. As discussed, transit oriented development is considered a permitted use within industrial-zoned areas, and the proposed project would include approval of a planned development permit to allow mixed-use residential development on the project site. However, though the proposed project would comply with the allowed density, gross floor area, and FAR permitted by the Land Use Element of the city's General Plan, it would exceed the allowed gross floor area and FAR. The East Pasadena Specific Plan limits building FAR to 1.2:1. The Planned Development application requests approval to allow an FAR of 1.53:1. Apart from building floor area, the proposed project would comply with the other requirements for the zoning district including setbacks, parking, and building height. Therefore, deviation from the FAR standards would not result in any environmental impact not otherwise analyzed in this document. Upon approval of the planned development permit, the proposed project would not conflict with the Zoning Code and impacts would be less than significant.



There are no adopted Habitat Conservation or Natural Community Conservation Plans in the City of Pasadena. There are also no approved local, regional or state habitat conservation plans. Further, there are no critical habitat areas currently mapped within the City of Pasadena (FWS 2017). Thus, no impacts would occur. (SCEA, p. 141)

**I. Mineral Resources**

**i. Potential Impacts Evaluated**

- Would the project 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?
- Would the project 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? (SCEA, p. 143)

**ii. Proposed Mitigation – None Required**

**iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to these aspects of mineral resources. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

**iv. Supporting Explanation**

No active mining operations exist within the City. Two areas in the City of Pasadena may contain mineral resources: Eaton Wash, which was formerly mined for sand and gravel, and Devils Gate Reservoir, which was formerly mined for cement concrete aggregate. The project is not near these areas. In addition, the project site is located in an area designated as MRZ-3, indicating that the area may contain mineral deposits but there is not sufficient information to determine the significance of these resources, and the General Plan does not identify any mineral resource conservation areas within the City. 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.

## **m. Noise**

### **i. Potential Impacts Evaluated**

- Would the project result in 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?
- Would the project result in a substantial permanent increase in ambient noise levels above those existing prior to implementation of the project?
- Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
- For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
- For a project near a private airstrip, would it expose people residing or working in the project area to excessive noise? (SCEA, p. 145)

### **ii. Proposed Mitigation – None Required**

### **iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to these aspects of noise. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

### **iv. Supporting Explanation**

In order to determine existing noise levels in the project site vicinity, four peak hour weekday morning 15-minute noise measurements (Leq[15] dBA) were taken on and near the project site on April 26, 2017. These noise measurements provide existing sound levels, which are primarily due to roadway noise from East Foothill Boulevard, North Kinneloa Avenue, Sierra Madre Villa Avenue, and the I-210 Freeway. On-site



sources of noise consist of activities associated with the existing storage facility and commercial uses. Based on measurement results summarized in Table 18 of the SCEA (p. 149), the project site experiences noise levels of approximately 70 dBA Leq at the northern project boundary along East Foothill Boulevard and 68 dBA Leq at the western boundary along North Kinneloa Avenue adjacent to the I-210 Freeway (see Figure 8 on p. 148 for location of noise measurements).

The average daily CNEL noise level is roughly 2-4 dBA higher than the peak hourly Leq in urban environments. Based on measured noise levels of 68 and 70 dBA Leq, the daily on-site CNEL ranges between 70 and 74 dBA CNEL, which is considered a conditionally acceptable noise environment according to the City's land use compatibility guidelines for a mixed-use residential development. The manner in which homes in California are constructed generally provides a reduction of exterior-to-interior noise levels of approximately 20 to 25 dBA with closed windows (FTA 2006). Based on an exterior noise exposure level up to 74 dBA CNEL, interior noise levels at the project site would be approximately 54 dBA CNEL. The applicant would comply with the CCR Title 24 interior noise standard of 45 dBA CNEL and would install forced-air mechanical ventilation and exterior building materials (i.e., residential windows, exterior doors, exterior wall assemblies) with a Sound transmission Class (STC) rating of 30 to reduce interior noise levels of habitable rooms. The resulting interior noise level would be 44 dBA CNEL (74 dBA CNEL minus 30 dBA) and would meet the interior noise standard of 45 dBA CNEL. Therefore, the exposure of proposed noise-sensitive residences to excessive noise would be reduced to a less than significant level with implementation of sound insulation features.

The proposed project would introduce a new residential/commercial mixed-use development on the project site. Existing offsite noise-sensitive uses near the project site and proposed new residential uses on-site may periodically be subject to noise associated with operation of the proposed project. The proposed project would cause a noise impact if operational noise levels would exceed existing ambient noise levels by more than 5 dB at the project's property line and the property lines of nearby noise-sensitive receptors in accordance with PMC Chapter 9.36. Parking noise would not be a significant source of operational noise since on-site parking activities would occur either in a subterranean parking garage or multi-story structure adjacent to the I-210 Freeway. Individually, other on-site operational noise sources would not generate substantial noise levels. However, for a conservative analysis, operational noise levels at nearby receptors would be a combination of all operational activities. Based on the average noise levels for all on-site operational noise sources (i.e., HVAC mechanical equipment, delivery and trash trucks, outdoor gathering/retail and recreational uses), the approximate distances of these noise sources to the nearest offsite noise-sensitive receptors and on-site project property lines, and a noise attenuation rate of 6 dBA per



doubling of distance, the proposed project would generate operational noise levels shown in Table 23 of the SCEA (p. 162). As shown in Table 23 of the SCEA, operation of the proposed project would not cause noise levels in excess of existing ambient noise levels at the site boundary or at any offsite noise-sensitive receptors.

The project would generate new vehicle trips and increase traffic volumes on area roadways, which would increase off-site roadway noise levels. However, the addition of project-generated traffic to adjacent roadways would not generate a significant increase in ambient traffic noise when compared to existing conditions, nor would it generate a significant increase in ambient traffic noise when compared to cumulative conditions (see Table 25 and Table 26 on p. 164 of the SCEA). Other roadways in the vicinity of the project would also experience an increase in traffic, albeit to a lesser degree than the four evaluated segments. The traffic volume increase at such other roadways would not exceed the applicable significance thresholds for any of the evaluated roadways with implementation of a Transportation Demand Management (TDM) plan. Further details of the TDM plan are provided in Section 17, *Transportation and Traffic* of the SCEA. Therefore, project-generated traffic would not create a substantial roadway noise impact on noise-sensitive receptors in the vicinity of the project site. (SCEA, p. 165)

Project construction (i.e., demolition, site preparation, grading, building construction, paving, and architectural coating) would be required to comply with PMC Section 9.36.070, which limits the permitted hours for construction activity to be between 7:00 AM and 7:00 PM during the weekday and between 8:00 AM and 5:00 PM on Saturdays. Therefore, construction noise would not impact nearby residential receptors or medical office patients during recognized hours of sleep. However, according to PMC Section 9.26.080, the operation of powered construction equipment is prohibited if such equipment emits noise at a level in excess of 85 dBA when measured within a radius of 100 feet from the source. As shown in Table 27, construction would increase ambient noise levels to up to approximately 79 dBA Leq at 100 feet from the source, which is less than the 85 dBA maximum allowed under PMC Section 9.36.070. Construction noise impacts would be temporary and less than significant. (SCEA, p. 165)

The project site is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The nearest airports are the El Monte Airport and the Hollywood Burbank Airport (formerly the Bob Hope Airport), which are located approximately 5.4 miles east and 12 miles northwest of the project site, respectively. Therefore, noise impacts related to airports and private airstrips would not occur. (SCEA, p. 166)



## **n. Population and Housing**

### **i. Potential Impacts Evaluated**

- Would the project induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?
- Would the project displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere?
- Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? (SCEA, p. 167)

### **ii. Proposed Mitigation – None Required**

### **iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to population and housing. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

### **iv. Supporting Explanation**

Based on the community's current household demographics (e.g., an average of 2.46 persons per household for the City of Pasadena), the construction of 550 dwelling units would result in an increase in up to approximately 1,353 net permanent residents in the City of Pasadena. The proposed increase in housing units and population would be consistent with the SCAG forecast of 3,500 additional households and approximately 10,400 persons in the City of Pasadena between 2010 and 2040. The operational-related population growth impacts would be within SCAG's regional projections and therefore population growth generated from operation of the proposed project would be less than significant.

Further, the Land Use Element of the East Pasadena Specific Plan Area stipulates a development capacity of 750 residential units and 1,095,000 SF of commercial development. The proposed project involves development of 550 residential units and 9,800 SF of supporting commercial use. Therefore, development included under the proposed project would be consistent with the development capacities

established for the East Pasadena Specific Plan Area and impacts to population growth would be less than significant.

The project site is occupied by a storage facility, so no displacement of existing housing would occur with the development of the proposed project, and the project would not displace people and no impact would occur. The proposed project would consist of the development of new housing and commercial land uses on a site that is currently occupied by an industrial and storage uses. No displacement of existing occupied housing would occur with development of the proposed project, and therefore, no impact would occur. (SCEA, p. 170)

**o. Public Services**

**i. Potential Impacts Evaluated**

- Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:
  - Fire protection
  - Police protection
  - Schools
  - Parks
  - Other public facilities (SCEA, p. 173)

**ii. Proposed Mitigation – None Required**

**iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to public services. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.



#### **iv. Supporting Explanation**

The project site is located in an urbanized area and is considered a low fire hazard area (Pasadena 2002b). The nearest fire station to the project site is Pasadena Fire Department Station 37, located at 3430 East Foothill Boulevard, approximately 0.34 miles east of the project site. Development of the project site would comply with all applicable City, state, and federal codes and ordinances related to fire safety, and architectural plans would be reviewed and approved by the City of Pasadena Fire Department prior to project implementation. Further, the proposed project is required to incorporate safety and security features, including fire sprinklers, alarm systems, and adequate access for emergency vehicles. Therefore, the proposed project would not require the development of new or physically altered fire protection facilities and would not significantly impact fire protection services. Impacts would be less than significant. (SCEA, p. 173-174)

The proposed project would be served by the Pasadena Police Department, which has established five community service areas (West, Northwest, Central, East, and Midtown) across the City. The project site is located in the East Community Service Area 4 (Pasadena 2013). The nearest police station is operated by the San Marino Police Department located at 2200 Huntington Drive N. Garfield Avenue and is 2.3 miles southwest of the project site. The nearest Pasadena Police Department Station is located at 207 Garfield Avenue 3.4 miles west of the project site. The Pasadena Police Department currently has approximately 296 officers on staff and an average emergency response time of approximately 4 minutes. Implementation of the proposed project would not result in a substantial population increase or the introduction of uses or activities typically associated with high demand for police services. Further, with an anticipated population growth of 1,353 generated by the proposed project, the project area would be sufficiently served by the existing police force and would not considerably change the average service ratio. Therefore, proposed project would not result in the need for additional new or altered police protection facilities and would not affect response times. Impacts would be less than significant. (SCEA, p. 174)

The Project area is currently served by the following public schools: Norma Coombs Elementary School, Wilson Middle School and Pasadena High School (City of Pasadena 2017c). As shown in Table 31, the Proposed Project would generate approximately 91 elementary students, 25 middle school students, and 52 high school students for a total of approximately 168 students. It is likely that some of the students generated by the proposed project already reside in areas served by the Pasadena Unified School District and would already be enrolled in PUSD schools. However, for a conservative analysis, it is assumed that all students generated by the Proposed Project would be new to the PUSD. The project applicant would be required to pay mandatory



developer fees to offset the proposed project's demands upon local schools. This would be in compliance with the applicable mitigation measure provided in the East Pasadena Specific Plan EIR. Thus, the proposed project's potential impact upon public school services would be reduced to a less than significant level with compliance with the State Education Code. (SCEA, p. 175)

As identified in the City of Pasadena Green Space, Recreation, and Parks Element (City of Pasadena 2007), the City's parks system consists of approximately 338 acres of land designated as parks and approximately 502 acres of land designated as open space. The City's current population is estimated at 143,333 people (DOF 2017). Based on this population and the 338 acres of parkland inside the city limits, there are 2.36 acres of parkland for every 1,000 residents. The Quimby Act uses the standard ratio of 3 acres of parkland for every 1,000 residents. The City is currently below the standard ratio for parkland in the Quimby Act. However, the proposed project would include development of recreational improvements, including publicly-accessible parks, courtyards, and a dog park, to help meet the recreational needs of future residents, development would be consistent with the goals of the General Plan and would help reduce the increase in demand for public parks generated by the project. Further, the project applicant would be required to pay City per unit recreation fees for development projects that are used to support park maintenance throughout the City. Overall, as the proposed project would not generate a substantial increase in population within the City, would not considerably alter the parkland-to-resident ratio, and the applicant would pay City development recreation fees, the project would not create the need for new or expanded park facilities and impacts would be less than significant. (SCEA, p. 176)

The proposed project would incrementally add to impacts to the City's public services and facilities such as storm drain usage (discussed in SCEA Section 10, *Hydrology and Water Quality*), public parks, solid waste disposal (discussed in SCEA Section 18, *Utilities and Service Systems*), water usage and wastewater disposal (discussed in more detail in SCEA Section 18, *Utilities and Service Systems*). However, development of increased mixed-use development was accounted for in buildout in the General Plan and analyzed in the EIR for the City's General Plan Update. As such, the project and the associated need for public services was anticipated by the City. Therefore, the project's impact, taking into account existing capacities and assuming compliance with existing ordinances, would be less than significant. (SCEA, p. 176)



**p. Recreation**

**i. Potential Impacts Evaluated**

- 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?
- 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?

**ii. Proposed Mitigation – None Required**

**iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to recreation. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

**iv. Supporting Explanation**

The proposed project consists of eight mixed-use residential structures that would directly increase the City population. The project would create an estimated 1,353 new residents within the project area, which could increase use of recreational facilities by future residents. However, as described above in SCEA Section 15, *Public Services*, the project area is adequately served by recreational facilities and parkland and the construction of the proposed project would not cause substantial physical deterioration of these existing recreational facilities. Further, the proposed project would include development of recreational improvements including publicly accessible parks, courtyards, and a dog park, to help meet the recreational needs of future residents, which would help reduce the increase in demand for public parks generated by the project. In addition, the project applicant would pay City per unit recreation fees for development projects that are used to support park maintenance throughout the City. As such, impacts relating to recreation from the proposed project would be less than significant. (SCEA, p. 179)



## **q. Traffic**

### **i. Potential Impacts Evaluated**

- Would the project 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?
- Would the project 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?
- Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?
- Would the project result in inadequate emergency access?
- Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?

### **ii. Proposed Mitigation – None Required**

### **iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to transportation/traffic. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

### **iv. Supporting Explanation**

The 2010 Congestion Management Program (CMP) for Los Angeles County requires local jurisdictions to consider the regional transportation impacts that may result from major development projects through the local land use approval process. The geographic area examined in the traffic study must include the following, at minimum:



- All CMP arterial monitoring intersections where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours of adjacent street traffic
- If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips
- Mainline freeway monitoring locations where the project will add 150 or more peak hour trips
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system

According to the TIA, the project would generate 3,648 daily trips, 344 AM peak hour trips, 333 PM peak hour trips. The arterial monitoring station location near the project area is Rosemead Boulevard at Foothill Boulevard (CMP ID 121). Based on the trip distribution calculated for the proposed project, the project would add 34 AM and 33 PM peak hour trips to this intersection. Therefore, the project would not add 50 or more trips during either the AM or PM weekday peak hours of adjacent street traffic. In addition, the mainline freeway monitoring location near the project area is I-210 Freeway at Rosemead Boulevard (CMP Station 1061). Based on the trip distribution, the proposed project would add 69 AM and 67 PM peak hour trips to the monitoring station location. However, the project would not add 150 or more trips during the peak hours. Further, the project would be subject to mitigation measure MM-TRA-2(b) of SCAG's RTP/SCS EIR regarding impacts to congestion management plans. Therefore, no further CMP analysis is required and impacts would be less than significant. (SCEA, p. 189-190)

The nearest public use airports are the El Monte Airport and the Hollywood Burbank Airport (formerly the Bob Hope Airport) in Burbank, which are located approximately 5.4 miles east and 12 miles northwest of the project site, respectively. The building height of the proposed project would be consistent with development standards for the project site and would not present any impediments to air traffic. No impact would occur.

The proposed project and its impact on vehicle circulation has been evaluated by the City's Department of Transportation. The project circulation design would not be hazardous to traffic circulation either within the project site or the project vicinity. In addition, the project's circulation design meets the City's engineering standards. The solar panels proposed for the roof area of the proposed project could generate glare that would be incident on motorists along the I-210 freeway south of the project site. However, as the solar panels would be designed to absorb sunlight rather than reflect it,



any increase in glare from the solar panels would be nominal. Therefore, the proposed project would not increase hazards due to a design feature or incompatible use. No significant impacts would occur. (SCEA, p. 195)

Vehicular access to the project would be provided via four driveways: two driveways along Kinneloa Avenue south of Foothill Boulevard and two driveways on Foothill Boulevard, as follows:

- The most southerly driveway proposed on Kinneloa Avenue is proposed to operate as an exit-only
- The easterly Foothill Boulevard driveway is proposed to operate as an in-bound, right-in only operation
- The westerly Foothill Boulevard driveway is at the intersection of Santa Paula Avenue and Foothill Boulevard and is proposed to prohibit northbound and southbound movements to minimize neighborhood intrusion
- The northerly driveway along Kinneloa Avenue would have a queuing space to accommodate three car lengths

Site ingress and egress would comply with all building, fire, and safety codes and final plans would be 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. In addition, all construction staging would occur outside of travel lanes and would not interfere with vehicular circulation. Therefore, impacts to emergency access would be less than significant.

The proposed project would not conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities. Conversely, the proposed project would improve the quality of the pedestrian environment with landscaping, sidewalk enhancement, and patio areas along Foothill Boulevard. The proposed project would also provide 84 bicycle parking spaces to encourage travel by bicycle. In addition, Los Angeles Metro, Foothill Transit, METRO, and Pasadena Area Rapid Transit Service currently provide public transit in the project area and the project site is within walking distance from the Sierra Madre Villa Gold Line Station. In addition, the CMP transit analysis for the proposed project considered the following factors:

- Summary of existing transit service in the study area;
- Project trip generation estimates;
- Project transit trip estimates;



- Project components including facilities and programs to encourage public transit use; and
- An analysis of transit impacts and mitigations, if any.

As discussed in the TIA, the proposed project would generate approximately 766 daily transit trips, 72 AM peak hour transit trips, and 70 PM peak hour transit trips. However, with 10 transit lines in the project vicinity apart from the Sierra Madre Villa Gold Line Station, the TIA concluded that there would be adequate transit capacity to serve the proposed project. As such, the project would have a less than significant impact on adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, and would not otherwise substantially decrease the performance or safety of such facilities.

#### **r. Utilities and Public Services**

##### **i. Potential Impacts Evaluated**

- Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- Would the project 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?
- Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
- Would the project 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?
- Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

- Would the project comply with federal, state, and local statutes and regulations related to solid waste? (SCEA, p. 201)

**ii. Proposed Mitigation – None Required**

**iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

As noted above and explained below, the SCEA analysis determined that implementation of the proposed project would not result in significant impacts related to utilities and service systems. As such, findings pursuant to CEQA Guidelines Section 21155.2 are not warranted.

**iv. Supporting Explanation**

All sewage from the project site would be conveyed to existing city sewer lines and facilities and then to LACSD trunk sewers for conveyance and treatment. Conservatively assuming that wastewater generation would be approximately 80 percent of the project's water demand (144.6 acre-feet/year or approximately 129,031 gallons per day), the proposed project would generate approximately 103,225 gallons of wastewater per day, as shown in Table 34 of the SCEA (p. 203). Generally, sewer systems incur between 65 to 85 percent return rates from water use depending on the type of land use being serviced (VWD 2010). Given the proposed land uses included for development under the project, the assumption of wastewater generation being 80 percent of water demand provides a more conservative analysis. This increase in wastewater generation would constitute approximately 0.3 percent of the existing unused capacity of the San Jose Water Reclamation Plant of approximately 35.4 million gallons per day (gpd).

All wastewater generated by the proposed project would be regulated by applicable standards and requirements that are imposed and enforced by the City's Department of Public Works, Engineering Division, and would be treated in compliance with the requirements of the Los Angeles RWQCB. Further, the proposed project would be subject to the LACSD's sewer connection fee when the project is connected to a sewer line to ensure adequate operation and maintenance of the wastewater management system. In addition, the growth associated with the project has been accounted for in potential planned expansions of LACSD's facilities and would not exceed planned sewer system capacities. Therefore, the proposed project would not exceed wastewater treatment requirements, would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, and would not result in a determination by the wastewater treatment provided



which serves or may serve the project that it has inadequate capacity to serve the project's projected demand. Impacts would be less than significant. (SCEA, p. 202-203)

A majority of the site would remain paved under the proposed project and there would be no substantial increase the amount of impermeable surface area. Project implementation would result in similar drainage patterns as existing conditions. The project site is located in a developed area where storm drainage is provided by existing streets, storm drains, flood control channels, and catch basins and the proposed project would not require the construction of new stormwater drainage facilities or the expansion of existing facilities.

As discussed in SCEA Section 10, *Hydrology and Water Quality*, the proposed project would involve minor changes in the site's drainage patterns, would not involve altering any drainage courses or flood control channels, and would comply with the City's stormwater ordinance to ensure that post-development peak stormwater runoff rates would not exceed predevelopment peak stormwater runoff rates. Further, the project has prepared an on-site drainage plan that incorporates Low Impact Development (LID) BMPs that would meet the water quality performance criteria specified in the Los Angeles County MS4 Permit. The LID BMPs incorporated into the project design include rainwater harvesting facilities distributed throughout the project site with the capacity to collect and treat the stormwater quality design volume defined as the runoff from the 85th percentile, 24-hour rain event, which would meet the City's SUSMP and LID requirements. Therefore, impacts to storm water drainage facilities by the proposed project would be less than significant. (SCEA, p. 203)

Development projections were incorporated into Pasadena Water and Power's (PWP) 2015 Urban Water Management Plan (UWMP), particularly for determining future water demand projections (PWP 2016). Because the 2015 UWMP incorporates the updated projections for Single-Family, Multi-Family, and Commercial/Institutional growth, it accounts for the associated water demand of these uses. Therefore, as the residential and commercial development of the proposed project is within the projections of the updated Land Use Element for the East Pasadena area, the associated water demand of this project was accounted for in the 2015 UWMP.

Overall, as concluded in the WSA, PWP's 2015 UWMP indicates that existing water allocations and groundwater supplies would be able to provide an adequate supply of water to meet projected demand within the City, including development of the proposed project, through 2040. PWP reviewed the WSA and confirmed that the City's UWMP provides for increased water demands for future residential and commercial development, as identified in the Land Use Element of the City's General Plan Update. Therefore, development of the land uses included in the proposed project was included



as consideration of cumulative development in the forecasted water demand of the UWMP. (SCEA, p. 205)

The proposed project would generate approximately 307 tons of waste per year (according to CalEEMod results) as shown in Table 36 of the SCEA (p. 207). Based on an estimated 150 – 300 pounds per cubic yard, this would be approximately between 2,046 and 4,093 cubic yards per year (Northeast Recycling Council n.d.). Solid waste would be collected by a private hauler and transported primarily to the Scholl Canyon Landfill, located approximately 6 miles west of the project site, 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 2017). 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. Overall, compliance with existing waste reduction regulations would help ensure that the proposed project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste. Therefore, impacts related to solid waste generation would be less than significant. (SCEA, p. 207)

#### **IV. RESOLUTION REGARDING ENVIRONMENTAL IMPACTS MITIGATED TO BELOW A LEVEL OF SIGNIFICANCE**

The City Council finds that mitigation measures have been identified in the SCEA that will reduce the following potentially significant environmental impacts to below a level of significance. For each environmental topic within this category, the discussion below begins with a delineation of the potential impacts evaluated in the SCEA, as specifically related to that topic, along with page citations as to where in the SCEA the relevant discussion is found, and is followed by presentation of the mitigation measure(s) identified in the SCEA for that topic, and then provides an explanation of the substantial evidence in support of the SCEA conclusion that the impact would be reduced to a level less than significant within implementation of the mitigation measure(s).

##### **a. AIR QUALITY**

###### **i. Potential Significant Impacts Evaluated**

- Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment



under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? (SCEA, p. 53-61)

## ii. Proposed Mitigation

### **MM-AQ-1: Construction Equipment Controls**

During construction, all off-road construction equipment greater than 50 horsepower shall minimally meet U.S. EPA Tier 3 emission standards to minimize emissions of NOX associated with diesel construction equipment. Use of construction equipment that meets U.S. EPA Tier 4 emission standards is preferred. (SCEA, p. 55)

### ***SCAG RTP/SCS Mitigation Measures***

#### **MM-AIR-2(b):**

Consistent with the provisions of Section 15091 and 21155.2 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the CARB, air quality management districts, and other regulatory agencies. Where the Lead Agency has identified that a project has the potential to violate an air quality standard or contribute substantially to an existing air quality violation, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s) and other agencies as set forth below, or other comparable measures, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible.

CARB, South Coast AQMD, Antelope Valley AQMD, Imperial County APCD, Mojave Desert AQMD, Ventura County APCD, and Caltrans have identified project-level feasible measures to reduce construction emissions:

- Minimize land disturbance
- Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas
- Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes
- Cover trucks when hauling dirt
- Stabilize the surface of dirt piles if not removed immediately
- Limit vehicular paths on unpaved surfaces and stabilize any temporary roads
- Minimize unnecessary vehicular and machinery activities



- Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities
- On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications
- Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet
- Ensure that all construction equipment is properly tuned and maintained.
- Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway
- Project sponsors should ensure to the extent possible that construction activities utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators
- Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites
- As appropriate, require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site
- Implement EPA's National Clean Diesel Program
- Diesel- or gasoline-powered equipment shall be replaced by lowest emitting feasible for each piece of equipment from among these options: electric equipment whenever feasible, gasoline-powered equipment if electric infeasible
- On-site electricity shall be used in all construction areas that are demonstrated to be served by electricity



- If cranes are required for construction, they shall be rated at 200 hp or greater equipped with Tier 4 or equivalent engines
- Use alternative diesel fuels, such as Clean Fuels Technology (water emulsified diesel fuel) or O2 diesel ethanol-diesel fuel (O2 Diesel) in existing engines
- Convert part of the construction truck fleet to natural gas
- Include "clean construction equipment fleet", defined as a fleet mix cleaner than the state average, in all construction contracts
- Fuel all off-road and portable diesel powered equipment with ARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road)
- Use electric fleet or alternative fueled vehicles where feasible including methanol, propane, and compressed natural gas
- Use diesel construction equipment meeting ARB's Tier 4 certified engines or cleaner off-road heavy-duty diesel engines and comply with State off-road regulation
- Use on-road, heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road diesel engines, and comply with the State on-road regulation
- Use idle reduction technology, defined as a device that is installed on the vehicle that automatically reduces main engine idling and/or is designed to provide services, e.g., heat, air conditioning, and/or electricity to the vehicle or equipment that would otherwise require the operation of the main drive engine while the vehicle or equipment is temporarily parked or is stationary
- Minimize idling time either by shutting off equipment when not in use or limit idling time to 3 minutes Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the 3 minute idling limit. The construction contractor shall maintain a written idling policy and distribute it to all employees and subcontractors. The on-site construction manager shall enforce this limit
- Prohibit diesel idling within 1,000 feet of sensitive receptors
- Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time
- The engine size of construction equipment shall be the minimum practical size
- Catalytic converters shall be installed on gasoline-powered equipment



- Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit
- Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch onsite
- Use new or rebuilt equipment
- Maintain all construction equipment in proper working order, according to manufacturer's specifications. The equipment must be checked by an ASE-certified mechanic and determined to be running in proper condition before it is operated
- Use low rolling resistance tires on long haul class 8 tractor-trailers
- Suspend all construction activities that generate air pollutant emissions during air alerts
- Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines

### ***Pasadena General Plan EIR Mitigation Measures***

#### **2-1:**

Prior to issuance of any construction permits, development project applicants shall prepare and submit to the City of Pasadena Planning Division a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City of Pasadena Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Division. Mitigation measures to reduce construction-related emissions include, but are not limited to:

- Requiring fugitive-dust control measures that exceed SCAQMD's Rule 403, such as:
  - Use of nontoxic soil stabilizers to reduce wind erosion
  - Applying water every four hours to active soil-disturbing activities

- Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials
- Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower
- Ensuring that construction equipment is properly serviced and maintained to the manufacturer's standards
- Limiting nonessential idling of construction equipment to no more than five consecutive minutes
- Using Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the SCAQMD's website at [http://www.aqmd.gov/prdas/brochures/Super-Compliant\\_AIM.pdf](http://www.aqmd.gov/prdas/brochures/Super-Compliant_AIM.pdf)

## 2.2:

Prior to future discretionary project approval, development project applicants shall prepare and submit to the City of Pasadena Planning Division a technical assessment evaluating potential project operation phase-related air quality impacts. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City of Pasadena Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the Standard Conditions of Approval. Below are possible mitigation measures to reduce long-term emissions:

- For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plugin of the anticipated number of refrigerated trailers to reduce idling time and emissions.
- Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.
- Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of



vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 § 2485).

- Site-specific development shall demonstrate that an adequate number of electrical vehicle Level 2 charging stations are provided onsite. The location of the electrical outlets shall be specified on building plans, and proper installation shall be verified by the Building Division prior to issuance of a Certificate of Occupancy.
- Applicant-provided appliances shall be Energy Star appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star appliances shall be verified by the Building & Safety Division during plan check.
- Applicants for future development projects along existing and planned transit routes shall coordinate with the City of Pasadena, Metro, and Foothill Transit to ensure that bus pads and shelters are incorporated, as appropriate.

### **East Pasadena Specific Plan EIR Mitigation Measures**

#### *CONSTRUCTION AND OPERATIONAL MITIGATION MEASURES*

##### Construction Measures

- Although particulate emissions are not expected to be significant, the City shall require that all construction comply with SCAQMD regulations, including Rule 402 which specifies that there be no dust impacts off site sufficient to cause a nuisance, and SCAQMD Rule 403, which restricts visible emissions from construction. Specific measures to reduce fugitive dust that will be required for all construction projects in the Specific Plan area shall include the following:
  - Moisten soil and debris piles prior to grading
  - Water exposed surfaces at least twice a day under calm conditions and as often as needed on windy days when winds are less than 25 miles per day or during very dry weather in order to maintain a surface crust and prevent the release of visible emissions from the construction site
  - Treat any area that will be exposed for extended periods with a soil conditioner to stabilize soil or temporarily plant with vegetation
  - Wash mud-covered tires and under-carriages of trucks leaving construction sites
  - Provide for street sweeping, as needed, on adjacent roadways to remove dirt dropped by construction vehicles or mud which would otherwise be carried off by trucks departing project sites

- Securely cover loads of dirt with a tight fitting tarp on any truck leaving the construction sites to dispose of excavated soil
- Cease grading during periods when winds exceed 25 miles per hour
- Provide for permanent sealing of all graded areas, as applicable, at the earliest practicable time after soil disturbance, and
- Contractors shall:
  - Maintain construction equipment in peak operating condition so as to reduce operation emissions
  - Use low-sulfur diesel fuel in all equipment
  - Use electric equipment whenever practicable
  - Shut off engines when not in use for more than five minutes.

The City shall specify that the proponents/applicants for future construction in the Specific Plan area use natural and pre-colored materials in construction to the extent feasible to minimize emissions of reactive organic compounds during painting and coating operations.

### **iii. Findings Pursuant to CEQA Guidelines Section 21155.2**

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the SCEA.

### **iv. Supporting Explanation**

Construction emissions would occur from engine exhaust from the off-road construction equipment and vehicle trips made by construction workers, vendors, and haul trucks. These emissions would primarily consist of carbon monoxide (CO), nitrogen oxides (NOx), particulate matter that measures 10 microns or less (PM10), particulate matter that measures 2.5 microns or less (PM2.5), sulfur dioxide (SO2), and reactive organic gases (ROG). In addition, earth disturbance activities from grading and paved road dust would result in fugitive dust emissions; architectural coating and paving activities would result in ROG emissions. Based on the construction-related air pollutant emissions estimated for the proposed project, as shown in Table 7, Estimate Construction Emissions, on page 61 of the SCEA, emissions from NOx would exceed the SCAMQD regional threshold of 100 pounds per day. This is because equipment used during construction of the proposed project was not assumed to meet U.S. EPA Tier 3 standards. While construction equipment fleets are prohibited from adding Tier 2 equipment to the fleet, as of January 1, 2018, a majority of construction equipment fleets currently under operation include Tier 2 equipment. This condition was assumed



in the model. Implementation of mitigation measure MM-AQ-1, which calls for off-road engines used during construction to meet USEPA Tier 3 emission standards, would reduce total NOx emissions to reduce construction-related NOx emissions to 91.1 pounds per day, which is below the SCAQMD regional threshold of 100 pounds per day. In addition, the project would also be required to comply with mitigation measures MM-AIR-2(b) and MM-AIR-4(b) provided in SCAG's 2016 RTP/SCS EIR as well as the applicable project-level mitigation measures for construction and operation provided in the 2015 Pasadena General Plan EIR and the East Pasadena Specific Plan EIR. As such, the impact would be reduced to less than significant (SCEA, p. 55)

## **b. BIOLOGICAL RESOURCES**

### **i. Potential Significant Impacts Evaluated**

- Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service? (SCEA, p. 66-71)
- Would the project 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? (SCEA, p. 72)

### **ii. Proposed Mitigation**

#### **MM-BIO-1: Nesting Birds**

To avoid disturbance of nesting and special-status birds, including raptorial species protected by the MBTA and CFGC, activities related to the project, including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season (February 1 through August 30). If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than 3 days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot inside the Project Boundary, including a 300-foot buffer (500-foot for raptors), and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practical. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California. If nests are