

**CITY OF PASADENA
PUBLIC HEALTH DEPARTMENT
1845 N. FAIR OAKS AVE.
PASADENA, CA 91103**

INITIAL STUDY

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

SECTION I – PROJECT INFORMATION

1. Project Title: City of Pasadena Urban Wildlife Management Plan
2. Lead Agency Name and Address: Public Health Department, City of Pasadena
1845 N. Fair Oaks Avenue, Pasadena, CA 91103
3. Contact Person and Phone Number: Rachel Janbek, Environmental Health Division Manager,
City of Pasadena Public Health Department, (626) 744-6067
4. Project Location: The proposed Urban Wildlife Management Plan would apply
citywide within the City of Pasadena, Los Angeles County, CA
(see Figure 1 – Regional Location Map and Figure 2 – Project
Location Map)
5. Project Sponsor's Name and Address: Public Health Department, City of Pasadena
1845 N. Fair Oaks Avenue, Pasadena, CA 91103
6. General Plan Designation: N/A
7. Zoning: N/A
8. Description of the Project:

Project Summary

The City of Pasadena Public Health Department is proposing to adopt a plan providing guidance for City staff in addressing wildlife concerns in the City of Pasadena (City). The proposed Pasadena Urban Wildlife Management Plan (Plan) describes the following three-pronged strategy for managing wildlife within City boundaries:

1. Public education designed around co-existence with wildlife;
2. Enforcement of laws and regulations prohibiting the feeding of wildlife; and
3. Ensuring public safety by implementing appropriate, tiered responses to coyotes and human interactions.

The first two components of the Plan (i.e., education and law enforcement) address black bears, cougars (i.e., mountain lions), coyotes, and other mammals (e.g., opossums, racoons, skunks, bobcats, and bats) frequently found in the foothills around the City.

The education component of the Plan would be key to having residents make appropriate decisions regarding their safety and the safety of their pets and properties where wildlife may be present. The City would provide residents, homeowners associations, and other members of the community with information about decreasing attractants around properties, such as removing food waste and cleaning up the landscape to remove prey habitat; increasing pet safety, such as monitoring pets when outside and using shorter leashes when walking; creating reasonable expectations of normal wildlife behavior (i.e., helping community members identify habituated/aggressive behavior versus typical wildlife behavior); and reshaping wildlife behavior, such as teaching hazing techniques to community members. The Plan would also include information for residents regarding how to recognize and address the symptoms of zoonotic diseases, such as rabies, Lyme disease, and flea-borne typhus.

The enforcement component of the Plan would provide the public with information about current State and local laws that address problem wildlife, as well as which entity would be enforcing these laws in the City. Specifically, the Plan would provide information on State, County of Los Angeles, and City codes that prohibit the feeding of rodents and predator mammals, noting that feeding (intentionally or unintentionally) could attract wildlife and their prey to an urban area, increasing the likelihood of habituated wildlife, and, therefore, increasing the likelihood of human and wildlife interactions. Within the City, the Pasadena Police Department (PPD) and the Pasadena Humane Society (PHS) enforce the State law(s) pertaining to feeding wildlife.

The third component of the Plan would provide a transparent, tiered response describing how the City will respond to different scenarios of human and coyote interactions. This would range from providing information about hazing to trapping and removing the problem coyote. This component of the plan would also specifically include actions related to coyote management. Trapping and removing a coyote would occur in cases when other management tools, such as hazing, are ineffective. The tiered response described below would be used by the City to classify different levels of human and coyote interactions. The Plan would provide a definition of coyote encounters in its Appendix A and an example chart of coyote behavior, classification, and the recommended response(s) in Appendix B.

Level Green: A coyote is seen or heard in an area. Sighting may be during the day or night. Coyote may be seen moving through the area or seen resting in one place. Education and hazing would be needed.

Level Yellow: A coyote appears to frequently associate with humans or human-related food sources and exhibits little wariness of human presence, including unattended domestic animal loss (i.e., a coyote injuring or killing a pet without people present). Coyote is seen during the day resting or continuously moving through an area frequented by people. Education and aggressive hazing would be needed, and a volunteer hazing team would be created.

Level Orange: A coyote is involved in an incident(s) where there is an attended domestic animal loss (i.e., a coyote biting or injuring an attended pet or a pet on a leash six feet long or less). A coyote enters a dwelling or yard where people are present or acts aggressively towards people. Several Level Yellow type incidents in the same general area may indicate the presence of a habituated coyote(s). Education and aggressive hazing would be needed, a volunteer hazing team would be created, and public awareness of incident(s) and circumstances would be discussed. If multiple Level Orange incidents have occurred in the same vicinity within a short amount of time, lethal removal may be recommended.

Level Red: A coyote has been involved in an investigated and documented provoked or unprovoked attack on a human. City staff would notify CDFW and would work with CDFW to locate and eliminate the responsible coyote(s).

The Plan would stress that that coyote removal is never taken lightly and that it is a serious decision. The presence of a coyote, or even the presence of a coyote which looks ill, would not mandate animal removal. It is only when the conditions reach the level of a human attack or provocation, or when there is a documented overconcentration of habituated coyotes in places which pose a risk to humans, particularly children (locations such as schools or parks), would the City recommend removal. Relocation of coyotes is not allowed in California without permission from the California Department of Fish and Wildlife (CDFW). Relocated coyotes may not survive the transfer as they would face competition from coyotes into whose territory they were moved. If the coyote survives the transfer, they rarely stay in the relocation area and tend to disperse to other locations where they may cause problems, be involved in territory disputes, or introduce diseases. In some instances, the dispersed coyotes go to great lengths to return to their previous territory. For these reasons, the CDFW rarely allows relocation of wildlife. Therefore, coyotes trapped and removed by the City would be euthanized.

The decision to remove would be recommended by the Director of Public Health and the Poundmaster, currently contracted to the PHS. Consultation with the PPD and/or Pasadena Fire Department would also be a consideration. The recommendation to remove would be made by the Director of Public Health to the City Manager, who would approve/deny the intent to proceed with removal. Removal would be conducted by representatives of CDFW or a State-licensed animal trapping agent under contract with the City.

In the event that a coyote is deemed to pose a threat to human health and safety, using the action thresholds in the Plan, the City's contracted animal trapping agent or CDFW would set traps to capture habituated or aggressive coyotes. The City's contracted animal trapping agency utilizes cage traps placed directly on the ground, which allow an animal to enter, but not leave, the cage. The physical footprint of these cage traps is minimal as they are in place for a short period of time and do not require stakes to secure the traps. Trapping would occur in one-week intervals until the problem (e.g., an aggressive coyote) is demonstrated to have been removed. While the trap is targeting the reportedly aggressive individual coyote, trapping efforts may capture other coyotes that are in the area. In this event, the trapped coyote would be removed, and the trap would be replaced until the habituated or aggressive coyote has been removed.

In the event that an animal is determined to pose a threat to human health and safety and is, therefore, trapped, removed, and disposed of, all waste would be disposed of in accordance with California state agencies, such as the CDFW, California Department of Food and Agriculture, and the California Environmental Protection Agency (CalEPA), as well as the California Code of Regulations Title 14. CalEPA identifies four methods for disposing of animal carcasses through the CalEPA Emergency Animal Disposal Guidance, which include rendering, landfilling, burial, and composting. Based on the CalEPA Guidance, landfilling would be the best environmental solution for the Proposed Project, since animal rendering is a treatment primarily reserved for livestock carcasses, and burial and composting would not be appropriate on municipal land or in the residential areas where trapping is anticipated to occur.¹

Existing Conditions

Background

As the City-designated "Poundmaster," the PHS is currently tasked with enforcing laws pertaining to domestic animals. To date, wildlife interactions with domestic animals have been included in the scope of services that the PHS provides, to a small degree. Further, if a wild animal, including small mammals, skunks, raccoons, and peafowl, is reported as injured or ill where they are no longer mobile, the PHS will remove the animal and provide treatment and/or euthanasia if necessary. The Plan would not change these existing services or the terms of the City's contract with the PHS. Reports of sightings of non-coyote mammalian predator, such as black bears, cougars, and bobcats, are recorded by the PHS, who advises residents how to keep their properties free of attractants, such as food and shelter for these large animals. The PHS does not respond to calls for service for normal wildlife behavior, such as sightings; however, they document when they receive

¹ California Veterinary Compliance Assistance, *California: Carcass Disposal State Regulations*, Website, available at <http://www.vetca.org/lacd/ca-lacd.php> and accessed on March 11, 2019.

these calls. To date, the PHS has responded to reports of aggressive coyotes, such as reports of coyotes threatening people in a populated area (e.g., park, playground, or school). Reports of aggressive black bears, cougars, and bobcats are addressed by CDFW.

Coyote Population

Without tracking and updated inventories in the area, it is not possible to know the exact size of the coyote population within and around the City. In general, the number of mature coyotes in an area is linked to the amount of food and water resources available in their territory. Coyotes specifically are known to venture further into densely populated urban areas than some of these other animals, with reported sightings and pet attacks in the City of Downey, which is surrounded by freeways, as well as near busy street intersections in the City of Alhambra.^{2,3}

Human and Wildlife Interactions

Environmental conditions, such as drought or forest fires, and territorial disputes among individuals can cause wildlife to leave their natural habitat and venture into urban areas looking for food, water, shade, and other resources. Wildlife utilize resources readily found in urban and suburban areas, such as household garbage, pet food, small pets, vegetable gardens and fruit trees, water sources, and abundant rodents.⁴ While urban coyotes occur in many states around the country, specific characteristics of Southern California have caused human-wildlife interactions to develop in the Los Angeles area earlier and to become more frequent than in other areas of the State or in other western states. Between 1990 and 2007, California and Arizona had the highest numbers of authenticated reports of coyote attacks on humans of any state, with California reporting 111 attacks and Arizona reporting 37 attacks.⁵ This may be because Los Angeles does not have large transition zones between suburban and rural areas, as often exist in other regions of the country.⁶ Rather, the Los Angeles area is abruptly bounded by mountains to the north and east. These mountains and foothill areas, some of which are covered by dense chaparral, provide habitat for wildlife. When resources in natural areas become limited, certain animals venture into suburban areas where lush residential vegetation provide attractive habitat and food resources.

Populations of black bear, cougar, bobcat, and coyote all reside in the Angeles National Forest; however, there are instances of these animals venturing into urbanized areas in cities or communities near the Angeles National Forest, such as Pasadena, Altadena, Arcadia, Azusa, and La Cañada Flintridge.

Reported Wildlife Sightings and Removal Actions

A search of local newspaper and magazine articles through the City of Pasadena library system yielded 52 articles and opinion letters in local Pasadena periodicals that discuss wildlife issues in the City and surrounding communities between April 2000 and October 2017. The articles and opinion columns were published in either the Pasadena Star News, the Pasadena Weekly, or the Pasadena/San Gabriel Valley Journal and include information on cougars, snakes, bobcats, black bears, and coyotes, such as reports of sightings, commentary on management actions, reports of aggressive behavior, general species information, and property maintenance and safety tips. In general, the human and wildlife interactions described in these articles are concentrated in neighborhoods near the Angeles National Forest and areas that abut open spaces and canyons. In the City, this includes areas around the Jet Propulsion Laboratory and less populated areas by the Arroyo Seco to the west, as well as Eaton Canyon and areas near the City's border with the City of Sierra Madre to the east. These data are presented in Figure 3 of this Initial Study. However, it should

² Faight, Lisa, *Coyotes discover ideal habitat right in area's urban back yards*. Pasadena Star News, May 05, 2004, p. A1.

³ Gold, Lauren, Pasadena Star News, *Dog has close call with coyote*, December 08, 2012, p. A5.

⁴ Timm, Robert M. and Baker, Rex O., *A History of Urban Coyote Problems*, Wildlife Damage Management Conference – Proceedings, #76, 2007.

⁵ Timm, Robert M. and Baker, Rex O., *A History of Urban Coyote Problems*, Wildlife Damage Management Conference – Proceedings, #76, 2007.

⁶ Gill, D.A., *Coyote and the urban man: A geographical analysis of the relationship between the coyote and man in Los Angeles*, M.A. Thesis, University of California, Los Angeles, CA, p. 114, 1965.

be noted that these articles do not represent a comprehensive list of human-wildlife interactions within the Pasadena area as some incidents are never reported to authorities. As such, these articles and opinion articles provide insight into where human and wildlife interactions occur within the City.

Figure 3 of this Initial Study also presents data collected by the City on wildlife sightings within the City boundary between May 2018 and October 2018. Data are reported to the City by residents. While these data do not capture every wildlife sighting within the City, the figure shows that many human and wildlife interactions take place in foothill communities or cities, such as Altadena and Sierra Madre, as well as areas of Pasadena that are characterized by single-family homes on larger lots or wooded areas with undulating terrain (such as areas on the south side of the City, as well as along the Arroyo Seco and near Eaton Canyon). Furthermore, Figure 3 shows that, while wildlife can be commonly found near relatively less-developed areas, coyotes and other wildlife can be found in developed, urban environments as well.

The following table shows the number of coyotes that have been removed from the population between 2013 and 2018, along with the locations where coyotes have been found over the same time period.

Table 1: Number and Location of Coyotes Removed by Year

Year	Number of Coyotes Removed ^a	Locations where Coyotes were Found
2013	1	Glendale
2014	4	San Marino, Glendale, and La Cañada
2015	7	San Marino, Monrovia, La Cañada, Arcadia, and Sierra Madre
2016	3	Arcadia and Pasadena
2017	12	Pasadena, La Cañada, Arcadia, Altadena, La Crescenta, Glendale, and Bradbury
2018	8	South Pasadena, Arcadia, La Cañada, and Glendale

^a The number of coyotes removed only reflects animals that were either already dead or injured (mostly due to motor vehicle interactions) and required euthanization.

Source: Data provided by Pasadena Humane Society, January 10, 2019.

As shown in Table 1, the highest number of coyotes removed in a single year is 12, which occurred in 2017. However, it should be noted that the PHS service area is greater than the City's boundary. Of all of the reported coyotes identified in Table 1, only four were removed within the City (two in 2016 and two in 2017).

Finally, the University of California Cooperative Extension operates an online survey system called the Coyote Cacher, which is used to collect geo-located information on human-coyote interactions in Los Angeles and Orange Counties. Interactions are categorized in three levels; 1) green, which is a sighting only or a pet that has gone missing; 2) yellow, which is when a coyote follows a human or chases or attacks a pet when the pet is unattended / off-leash; and 3) red, which is when a coyote bites a human or chases, attacks, or kills a pet while the pet is on a leash. Much of the data within the database are reported by residents, police departments, and the Los Angeles County Agricultural Commissioner's Office, which provides coyote removal services for Los Angeles County and a select number of cities with which they have a contract. As of 2015, cities contracting with the Los Angeles County Agricultural Commissioner's Office for coyote management, such as trapping and removal of aggressive coyotes, include the Cities of Rancho Palos Verdes, Rolling Hills Estates, Rolling Hills, Beverly Hills, Diamond Bar, Irwindale, La Cañada Flintridge, La Mirada, and West Covina. The Coyote Cacher database does not represent every human-coyote interaction within the region because many incidents are not reported. The City of Pasadena does not compile yearly data regarding coyote sightings; however, users of the Coyote Cacher reported approximately 133 sightings within the City of Glendale, which is located immediately to the west of Pasadena, in 2018.⁷

⁷ University of California Cooperative Extension. *Coyote Cacher*, available at <https://ucanr.edu/sites/CoyoteCacher/>, accessed January 11, 2019.

Approval Process

A draft of the Plan would be presented at a hearing before the Public Safety Committee of the City of Pasadena City Council. The Committee would have the opportunity to suggest changes to the document. Once the Committee recommends approval of the Plan, it will go before the City of Pasadena City Council for approval. Upon approval, the Plan will be implemented by the City of Pasadena Department of Public Health.

Regulatory Framework

The following identifies the laws and regulations adopted by the State and local agencies that are applicable to the implementation of the Plan:

California Code of Regulations (CCR)

CCR Title 14 (14 CCR), Section 251.1 (Harassment of Animals) states the following:

Except as otherwise authorized in these regulations or in the Fish and Game Code, no person shall harass, herd or drive any game or nongame bird or mammal or furbearing mammal. For the purposes of this section, harass is defined as an intentional act which disrupts an animal's normal behavior patterns, which includes, but is not limited to, breeding, feeding or sheltering. This section does not apply to a landowner or tenant who drives or herds birds or mammals for the purpose of preventing damage to private or public property, including aquaculture and agriculture crops.

14 CCR, Section 251.3 (Prohibition Against Feeding Big Game Animals) states the following:

No person shall knowingly feed big game mammals, as defined in Section 350 of these regulations.

14 CCR, Section 350 (Big Game Defined) states the following:

"Big game" means the following: deer (genus Odocoileus), elk (genus Cervus), pronghorn antelope (genus Antilocarpa), wild pig (feral pigs, European wild pigs and their hybrids (genus Sus), black bear (genus Ursus) and Nelson bighorn sheep (subspecies Ovis canadensis nelsoni) in the areas described in subsection 4902(b) of the Fish and Game Code.

CCR Title 14 (14 CCR), Section 465.5(g)(1) (Use of Traps/Immediate Dispatch or Release) states the following:

All furbearing and nongame mammals that are legal to trap must be immediately killed or released. Unless released, trapped animals shall be killed by shooting where local ordinances, landowners, and safety permit. This regulation does not prohibit employees of federal, state, or local government from using chemical euthanasia to dispatch trapped animals.

California Fish and Game Code

Section 4152(a) states the following:

*Except as provided in Section 4005, nongame mammals and black-tailed jackrabbits, muskrats, subspecies of red fox that are not the native Sierra Nevada red fox (*Vulpes vulpes nescator*), and red fox squirrels that are found to be injuring growing crops or other property may be taken at any time or in any manner in accordance with this code and regulations adopted pursuant to this code by the owner or tenant of the premises or employees and agents in immediate possession of written permission from the owner or tenant thereof. They may also be taken by officers or employees of the Department of Food and Agriculture or by federal, county, or city officers or employees when acting in their official capacities pursuant to the Food and Agricultural Code pertaining to pests, or pursuant*

to Article 6 (commencing with Section 6021) of Chapter 9 of Part 1 of Division 4 of the Food and Agricultural Code. Persons taking mammals in accordance with this section are exempt from Section 3007, except when providing trapping services for a fee. Raw furs, as defined in Section 4005, that are taken under this section, shall not be sold.

Section 4152(b) states the following:

Traps used pursuant to this section shall be inspected and all animals in the traps shall be removed at least once daily. The inspection and removal shall be done by the person who sets the trap or the owner of the land where the trap is set or an agent of either.

Los Angeles County Code

Los Angeles County Code Title 10, Section 10.84.010 (Providing Food for Certain Rodents or Predator Animals Prohibited) states the following:

- A. *It is unlawful to feed a nondomesticated rodent or nondomesticated mammalian predator as defined in this section unless:*
 - 1. *The person is the owner of the animal and the animal is kept in accordance with the requirements of the State Department of Fish and Wildlife; or*
 - 2. *After notifying the responsible agency to pick up the animal, the person provides food to a trapped or injured animal.*
- B. *For purposes of this chapter:*
 - 1. *"Rodent" includes ground squirrels;*
 - 2. *"Mammalian predators" includes coyote, raccoon, fox and opossum.*
- C. *A violation of this section is a misdemeanor.*

Pasadena Municipal Code (PMC)

PMC Section 6.32.110 (Feeding of non-domesticated mammalian predators) states the following:

Except as provided for in this chapter, no person shall feed or in any manner provide food for one or more nondomesticated mammalian predators which is not under the ownership or legal possession of such person, including but not limited to, coyotes, raccoons, foxes and possums.

A person may feed or provide food for one or more such nondomesticated mammalian predators which is trapped, unweaned or injured during that period of time between the person notifying the police department of the city and the animal or animals being picked up by the city or its designated agent.

PMC Section 6.36.020 (Persons authorized to capture dogs) states the following:

The chief of police, the officers of the police department, the poundmaster, the deputy poundmaster or any person employed for that purpose by the board of directors shall be, and such person hereby is, authorized and directed to capture any dog or other stray animal, wild or domestic, found within the city not restricted or confined as required by the provision of Section 6.12.010 or by any order of the board of directors made pursuant to Section 6.36.120. Should he be unable to capture a dog or other stray animal, wild or domestic, of vicious and dangerous habits he is authorized to then and there kill and destroy such dog, or other stray animal, wild or domestic.

For the purposes of this chapter, the poundmaster is the Pasadena Humane Society and the board of directors is the Pasadena City Council.

9. Surrounding Land Uses and Setting:

The City encompasses approximately 23 square miles in the western San Gabriel Valley, bordered by the unincorporated Altadena community to the north; the Cities of South Pasadena and San Marino to the south; the City of Arcadia to the east; and the Cities of Glendale, La Cañada Flintridge, and Los Angeles to the west. The City has a population of over 144,000 and a full spectrum of urban and suburban land uses, including an historic, urban core; single- and multi-family residential neighborhoods; hillside communities; significant public and institutional facilities; neighborhood- and region-serving commercial centers; industrial properties; and parks and open space, including the natural areas of the Arroyo Seco, Eaton Canyon, and San Rafael Hills.⁸

10. Other public agencies whose approval is required:

This Initial Study covers all approvals by government agencies that may be needed to approve and implement the proposed Urban Wildlife Management Plan. At this time, no discretionary approvals from public agencies other than the City of Pasadena are known or expected to be required for the Proposed Project.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

One tribe, the Gabrieleño Band of Mission Indians – Kizh Nation, has requested to be notified of projects within the City of Pasadena. The City sent a letter to the Kizh Nation on January 8, 2019, notifying them of the project and providing a summary of the project's scope and anticipated environmental impacts. The Kizh Nation responded to the City on January 17, 2019, requesting consultation. Consultation between the City and the Kizh Nation occurred on April 24, 2019. The results of the notification and consultation process are discussed in Section 20, Tribal Cultural Resources, of this Initial Study.

⁸ California Department of Finance, *Report E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2018, with 2010 benchmark*, 2018.

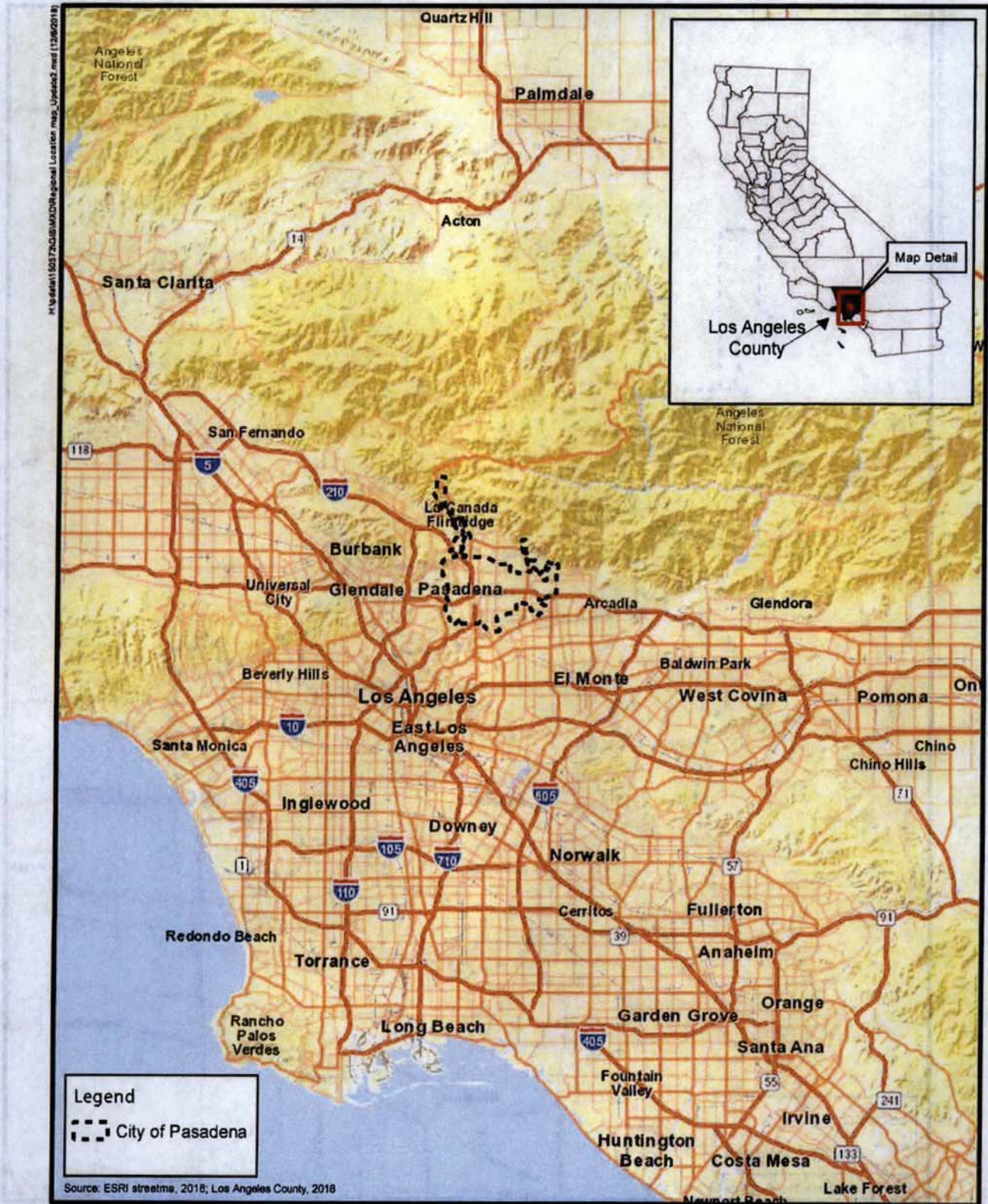


FIGURE 1
Regional Location Map

Michael Baker
INTERNATIONAL

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FIGURE 2
Project Location Map

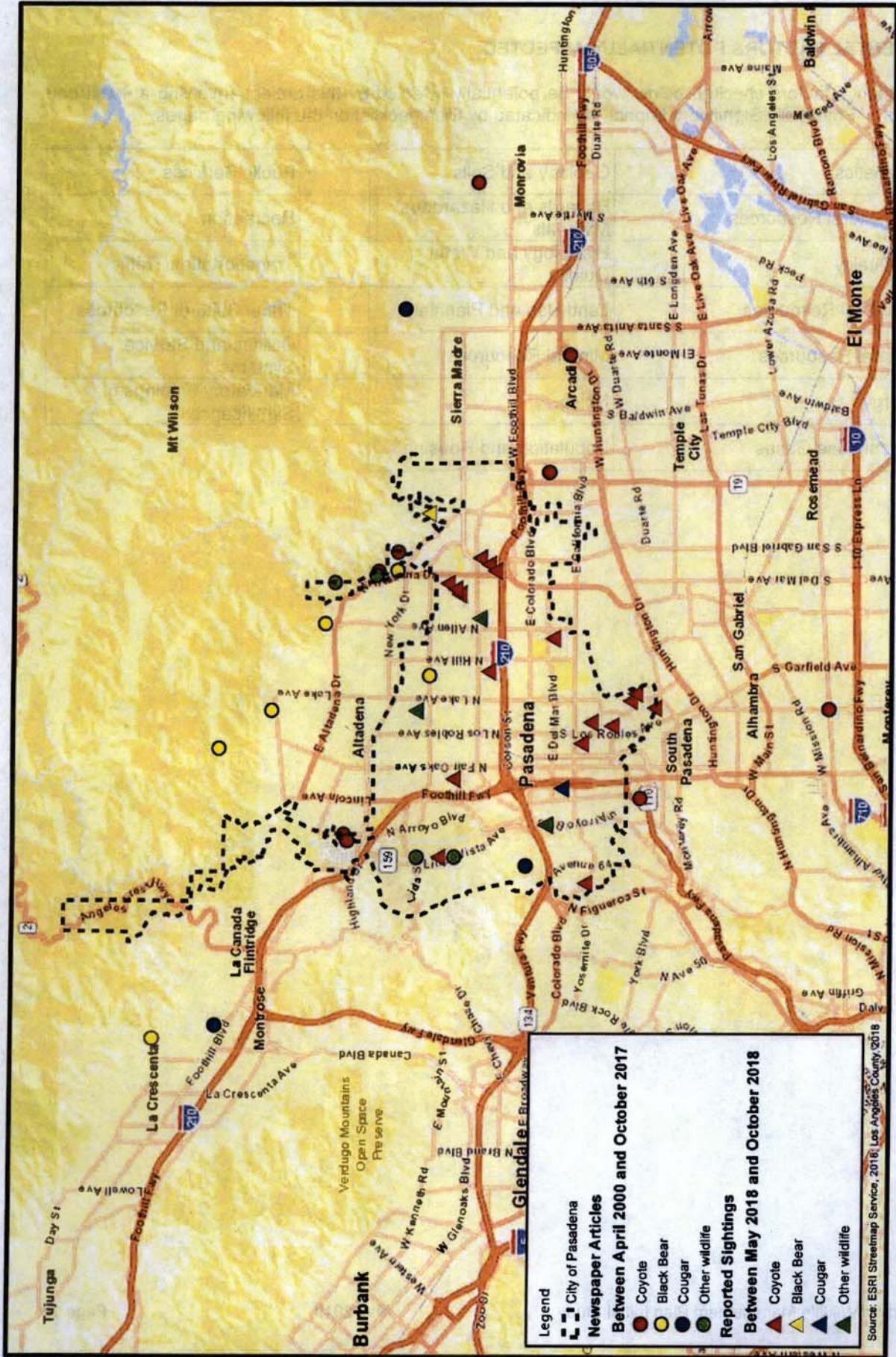


FIGURE 3
 Urban Wildlife Interactions and Sightings

Michael Baker
 INTERNATIONAL

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

DETERMINATION: (to be completed by the Lead Agency)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	X
I find that, although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment., but at least effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT (EIR) is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	

Madonna Marcelo
Prepared By

May 2, 2019
Date

Rachel Janbek
Reviewed By

May 7, 2019
Date

Madonna Marcelo
Printed Name

Rachel Janbek
Printed Name

John M. Bellas
Reviewed By

May 2, 2019
Date

John M. Bellas
Printed Name

Negative Declaration/Mitigated Negative Declaration adopted on: _____
Date

Adoption attested to by: _____
Signature Date

Printed name _____

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 21, "Earlier Analysis," may be cross-referenced).
- 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. See CEQA Guidelines Section 15063(c)(3)(D). Earlier analyses are discussed in Section 21 at the end of the checklist.
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures which were incorporated or refined from the earlier documents and the extent to which address site-specific conditions for the project.
 - 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significant.

SECTION II – ENVIRONMENTAL CHECKLIST FORM

1. BACKGROUND.

Date checklist submitted: May 2, 2019
Department requiring checklist: Department of Public Health
Case Manager: Rachel Janbek

2. ENVIRONMENTAL IMPACTS. (Explanations of all answers are required):

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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3. AESTHETICS. Would the project:

a. Have a substantial adverse effect on a scenic vista?

A scenic vista is generally defined as a vantage point with a broad and expansive view of a significant landscape feature (e.g., a mountain range, lake, or coastline) or of a significant historic or architectural feature (e.g., views of a historic structure). A scenic vista is a location that offers a high quality, harmonious, and visually interesting view. The EIR for the Pasadena General Plan provides the following description of the existing scenic features and visual resources in the City:

The City of Pasadena affords a variety of views of scenic landscapes and built environments. The San Gabriel Mountains, near the north City boundary, dominate the skyline from most of the City. The San Rafael Hills are along the western City boundary, and the Verdugo Mountains are further to the west. In addition, the Arroyo Seco corridor and Eaton Canyon traverse the western and eastern portions of the City, respectively. The City also offers scenic views of distinct architecture in the built environment, such as the Old Pasadena Historic District, Pasadena City Hall, Castle Green, St. Andrew Catholic Church bell tower, and Bungalow Heaven.⁹

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. The Proposed Project would not noticeably change the topography of any location within the City and would not result in the construction of any buildings or structures. Therefore, the Proposed Project would not cause any obstructions of scenic views within the City, including any views from a scenic vista. Thus, the Proposed Project would have no impact on a scenic vista.

⁹ Pasadena, City of, *General Plan Final Environmental Impact Report*, 2015.

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

The only designated state scenic highway in the City is the Angeles Crest Highway (State Highway 2), which is located north of Arroyo Seco Canyon in the northwest portion of the City.¹⁰ The segment of SR-110 (the Arroyo Seco Historic Parkway) from Colorado Boulevard in Pasadena to US-101 in downtown Los Angeles is identified as a National Scenic Byway by the Federal Highway Administration.¹¹ In addition, the segment of SR-110 from approximately Pasadena's southern City boundary to I-5 near downtown Los Angeles (between mileposts 31.9 and 25.7) is identified as a Historic Parkway (the Arroyo Seco Historic Parkway) in the California Scenic Highway Mapping System.¹² The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. Therefore, there would be no physical change within the viewshed of the Angeles Crest Highway or the Arroyo Seco Historic Parkway as a result of this Proposed Project. The Proposed Project would have no impacts to state scenic highways or scenic roadway corridors. Furthermore, the Proposed Project would not result in the destruction of any landmark eligible trees, stands of trees, rock outcroppings or natural features within a state highway recognized as having significant aesthetic value. No impacts to state scenic highways would occur.

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

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education about co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. As such, the physical impact of the Proposed Project is limited to setting temporary traps on an as-needed basis. As a result, there is no possibility for the Proposed Project to substantially degrade the existing visual character or quality of a site.

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

As previously stated, the Proposed Project has a minimal physical footprint, limited to setting temporary coyote traps on an as-needed basis. Further, the process of setting and managing traps would not introduce any new sources of light or glare affecting day or nighttime views. Similarly, the education and enforcement components of the Plan would not result in any new sources of light or glare. As a result, there is no possibility for the Proposed Project to create any new source of substantial light or glare.

¹⁰ California Department of Transportation, *California Scenic Highway Mapping System*, available at: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/, accessed August 22, 2018.

¹¹ U.S. Department of Transportation, Federal Highway Administration, *Arroyo SEco Historic Parkway – Route 110*, available at <https://www.fhwa.dot.gov/byways/byways/10246>, accessed January 11, 2019.

¹² California Department of Transportation, *California Scenic Highway Mapping System*, available at http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/, accessed August 2018

4. AGRICULTURE AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

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

The City is a developed urban area surrounded by hillsides to the north and northwest. The western portion of the City contains the Arroyo Seco, which is a naturalized area that runs from north to south through the City. The City contains no prime farmland, unique farmland, or farmland of statewide importance, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.¹³ As such, no impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur as a result of the Proposed Project.

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

The City has no land zoned for agricultural use other than commercial growing areas. Commercial Growing is permitted in CG (General Commercial), CL (Limited Commercial), and IG (General Industrial) zones and conditionally in RS (Residential Single-Family) and RM (Residential Multi-Family) districts. Commercial Growing is also permitted within certain specific plan areas. The City has no Williamson Act contract land, and the Proposed Project would not impact agricultural uses within the City. Therefore, no impacts would occur with regard to Williamson Act contract lands or agricultural zoning.

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

There are no timberland or Timberland Production zones within the City. Further, the Proposed Project does not have a physical footprint beyond setting traps to capture coyotes that are deemed to be threats to human health and safety; therefore, no impacts would occur to forestland or timberland resources.

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

As discussed, there is no forest land within the City. Further, the Proposed Project does not involve any land use conversions or physical impacts beyond limited disturbance resulting from setting and maintaining coyote traps. Therefore, the Proposed Project would not result in the conversion or loss of forest land, and no impacts would occur.

¹³ California Department of Conservation, *Los Angeles County Important Farmland*, 2016.

e. *Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?*

As discussed above, there is no known farmland in the City; therefore, the Proposed Project would not result in the conversion of farmland to a non-agricultural use, and no impacts would occur.¹⁴

5. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. *Conflict with or obstruct implementation of the applicable air quality plan?*

The City is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, as well as all of Orange County. The SCAB is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

The SCAQMD administers the Air Quality Management Plan (AQMP) for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recent adopted AQMP is the 2016 AQMP, which was adopted by the SCAQMD Governing Board on March 3, 2017.¹⁵ The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement.¹⁶

The purpose of a consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and, thus, if it would interfere with the region's ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook. The criteria are as follows:¹⁷

- Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

In general, projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). The Proposed Project consists of an urban wildlife management plan for the City, which would consist of public education activities focused on co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. As such, there are no anticipated activities that could result in the increase in the frequency or severity of existing air quality

¹⁴ California Department of Conservation, *Los Angeles County Important Farmland*, 2016.

¹⁵ South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan*, March 2017.

¹⁶ South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan*, March 2017.

¹⁷ South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

violations, cause new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP. In addition, there is no socioeconomic growth associated with the Proposed Project; therefore, the Proposed Project would not exceed the assumptions in the AQMP, and there would be no impact.

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

As discussed above, the City is located in the SCAB, which is considered nonattainment for certain criteria pollutants.^{18,19} The Proposed Project does not involve any construction activities and would not generate any emissions during Plan implementation. There is no potential for the Proposed Project to violate any air quality standard or contribute substantially to an existing or project air quality violation, and there would be no impact.

c. *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

As stated, the City is within the SCAB, which is considered nonattainment for certain criteria.^{20,21} As the Proposed Project's physical impact would be limited to setting temporary coyote traps on an as-needed basis, there would be no cumulatively considerable net increase of any criteria pollutant, and, therefore, no impact would occur.

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

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. Groups most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, places where sensitive receptors congregate and/or spend extended periods of time include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes. The Proposed Project would involve coyote removal on City-owned land, as well as in private residential areas, where the City has permission from property-owners to set traps or remove coyotes from private property. Additionally, if a problem coyote (defined as reaching threat Level Orange or Red) is present in the vicinity of a school, playground, or childcare center, the City would remove the problem coyote. While an agent of the City, such as the City-contracted, state-licensed animal trapper or the PHS, would be operating in the vicinity of locations where sensitive receptors congregate, the process of removing a coyote or of setting traps would not cause substantial pollutant concentrations to develop in the area. The only source of pollution concentrations as a result of the Proposed Project would continue to be from vehicle emissions during transit to and from the area where a problem coyote is thought to be, as well as the limited number of trips generated by any public meetings related

¹⁸ California Air Resources Board (CARB), *Area Designations Maps / State and National*, available at <https://www.arb.ca.gov/dcsig/adm/adm.htm>, accessed February 5, 2019.

¹⁹ United States Environmental Protection Agency (EPA), *Nonattainment Areas for Criteria Pollutants (Green Book)*, available at <https://www.epa.gov/green-book>, accessed February 5, 2019

²⁰ California Air Resources Board (CARB), *Area Designations Maps / State and National*, available at <https://www.arb.ca.gov/dcsig/adm/adm.htm>, accessed February 5, 2019.

²¹ United States Environmental Protection Agency (EPA), *Nonattainment Areas for Criteria Pollutants (Green Book)*, available at <https://www.epa.gov/green-book>, accessed February 5, 2019

to outreach and education. Given the limited, sporadic, and mobile nature of vehicle trips associated with coyote management, as well as the trips associated with the public meetings related to outreach and education, vehicular emissions would be negligible and would not cause any measurable increase in air pollutant concentrations. Therefore, the Proposed Project would not expose sensitive receptors to substantial pollutant concentration, and there would be no impact

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

Objectionable odors are typically associated with industrial projects and involve the use of chemicals, solvents, petroleum products, and other pungent elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The Proposed Project does not fit any category found within Figure 5-5 Land Uses Associated with Odor Complaints of the 1993 SCAQMD CEQA Air Quality Handbook.²² As a result, the Proposed Project is not anticipated to generate objectionable odors or affect any number of people. As such, there would be no impact from objectionable odors.

6. BIOLOGICAL RESOURCES.

This section focuses on the impacts to biological resources associated with the third component of the Plan (i.e., tiered response) as the first two components involving education and enforcement would not result in physical changes to the environment, particularly as related to biological resources. More specifically, the third component of the Plan would address human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. Impacts of the Proposed Project on the local coyote population are specifically addressed in Section 22, Mandatory Findings of Significance, of this Initial Study.

Would the project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

There is the potential for both federally and state listed species (threatened and endangered) to exist in the City. Numerous special status species have the potential to exist in the Pasadena area based on data from the U.S. Fish and Wildlife's (USFWS) Environmental Conservation Online System and the California Natural Diversity Database (CNDDDB) occurrence database.^{23,24} Such species include avian, mammalian, amphibian, and plant species.

The traps used to capture and remove coyotes through the proposed Plan would be non-lethal cage traps that would be placed and monitored by the City's contracted trapping company. The placement of the traps would target coyotes deemed to be a threat to public health and safety; however, in the unlikely event that a special status species is captured in a trap, the animal would be released in a timely manner. Further, traps would be placed directly on the ground and would not involve any grading or ground disturbance that would affect listed plants. Therefore, the Proposed Project would not directly impact any special status species and the impact on

²² SCAQMD (South Coast Air Quality Management District), *CEQA Air Quality Handbook*, 1993.

²³ U.S. Fish and Wildlife Environmental Conservation Online System (ECOS) database, available at <https://ecos.fws.gov/ipac/>, accessed August 15, 2018.

²⁴ California Department of Fish and Wildlife, *California Natural Diversity Database (CNDDDB)*, available at <https://www.wildlife.ca.gov/Data/CNDDDB>, accessed August 15, 2018.

species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or USFWS and habitat supporting such species, if any, would be less than significant.

Cougars are not listed as threatened or endangered; however, they have been designated as a Specially Protected Mammal in the State of California since 1990.²⁵ Although cougars have not been subject to hunting in California since 1972, little scientifically verified information is available regarding their state-wide abundance. The most recent available CDFW data (from 1996) estimate that 4,000 to 6,000 cougars reside in California; however, the Mountain Lion Foundation estimates that the statewide cougar population in California is closer to 3,100.²⁶ They thrive in the areas surrounding the Los Angeles basin, such as the Santa Monica Mountains, the Santa Ana Mountains, the Peninsular Range, and mountainous habitat in the Angeles National Forest.²⁷ The Plan does not include actions that would affect mountain lions.

- b. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Per the USFWS, there are no designated critical habitat areas within the City. Natural habitat areas within the City's boundaries are largely limited to the upper and lower portions of the Arroyo Seco, the City's western hillside area, and the unchannelized portion of Eaton Canyon. The Proposed Project is an urban wildlife management plan for the City, which would consist of public education focused on co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. As such, the physical impact of the Proposed Project is limited to setting and maintaining temporary, coyote traps on an as-needed basis. These traps would be placed directly on the ground and would not involve any grading or ground disturbance. Trapping would be in response to reports of coyotes that pose a risk to human health and safety. As shown in Figure 3, the areas where human and coyote interactions often occur are in urban and suburban areas abutting natural areas. The cage traps would not be placed within riparian or wetland habitats as they require being placed on dry land that is accessible to trappers. As such, trapping activities associated with implementation of the Plan would not have a substantial adverse effect on riparian or wetland habitats.

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

Wetlands, as defined by the U.S. Army Corps of Engineers (USACE), are lands that, during normal conditions, possess hydric soils, are dominated by wetland vegetation, and are inundated with water for a portion of the growing season. As identified on the USFWS' National Wetlands Inventory, existing wetlands in Pasadena are largely limited to the areas within and adjacent to the unchannelized portions of the Arroyo Seco and Eaton Wash and other surface water features (e.g., canyon drainages, golf course ponds, spreading basins, etc.).

²⁵ California Fish and Game Code, Division 4, Part 3, Chapter 10 (sections 4800-4810) Mountain Lions.

²⁶ Mountain Lion Foundation, *Mountain Lion Habitat in California*, available at <http://mountainlion.org/us/ca/-ca-habitat.asp>, accessed April 29, 2019.

²⁷ Ernest HB, Vickers TW, Morrison SA, Buchalski MR, Boyce WM, *Fractured Genetic Connectivity Threatens a Southern California (puma concolor) Population*, *PLoS ONE*, 9(10), 2014.

Wetland types/features within these areas include freshwater emergent wetland, freshwater ponds, and freshwater forested/scrub wetland.²⁸ The southeastern portion of the City is characterized by homes with large estates, often providing welcoming habitat to coyotes (e.g., fruit trees and rodent habitat). As a result, coyote encounters often occur in this area. While wetland habitat exists in the vicinity of where coyote trapping and removal may occur, the only physical impacts that would result from the Proposed Project involve those resulting from setting traps. This physical impact is expected to be minimal as the traps would be in place for a short amount of time and would be placed directly on the ground without the use of stakes to secure the trap in place. Traps would not be placed within wetland habitats because the traps need to be placed on firm, dry ground to avoid confining a trapped animal in standing water. Further, wetland habitats are not as accessible to trappers placing and checking the traps. Therefore, the Proposed Project would not result in have a substantial adverse effect on or encroach into federally protected wetlands, and there would be no impact.

d. *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

There are no planned physical land alterations or permanent structures associated with the Proposed Project; the only physical impacts would occur during coyote trapping and removal, which is done on a case-by-case basis. The traps would be in place until the target animal has been removed from the area. This means that the threat of interference with movement of native resident or migratory fish or wildlife by coyote trapping and removal is very small given the temporary nature of the trapping efforts, the limited number of traps set on an annual basis, and the small footprint of the traps themselves. As such, the impacts to movement of native, resident, or migratory fish or wildlife species, as well as impacts to established wildlife corridors, would be less than significant.

e. *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

The City of Pasadena's Ordinance No. 6896, City Trees and Tree Protection Ordinance, as amended by Ordinance No. 7184, codified in Chapter 8.52 of the Pasadena Municipal Code, aims to protect the tree canopy in the City. Specifically, the ordinance protects six different types of trees: public, landmark, landmark eligible, specimen, mature, and native trees.

The process of setting traps and removing problem coyotes that are deemed to be a threat to human health and safety would not impact any trees. Therefore, the Proposed Project would not conflict with local policies or ordinances protecting biological resources.

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

There are no adopted Habitat Conservation or Natural Community Conservation Plans established for the City. There are also no approved local, regional or state habitat conservation plans with which this Proposed Project

²⁸ U.S. Fish and Wildlife Service, *National Wetland Inventory*, available at <https://www.fws.gov/wetlands/>, accessed August 15, 2018.

could conflict.²⁹ Therefore, no impacts on an approved local, regional, or State habitat conservation plan would occur as a result of implementation of the Plan.

7. CULTURAL RESOURCES. Would the project:

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

Section 15064.5 of the CEQA Guidelines defines a historical resource as (1) a resource that is listed in, or determined to be eligible by the State Historic Resources Commission for listing in, the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

The Proposed Project consists of an urban wildlife management plan for the City, which would consist of public education activities focused on co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. Physically, the proposed Plan would be limited to the setting traps and removing problem coyotes that are deemed to be a threat to human health; the education and enforcement components of the Plan would not result in physical changes to any property in Pasadena. As described in the Project Description, the trapping activities would be conducted using cage traps placed on the ground surface. The physical footprint of these traps is minimal as the traps sit on the ground surface and do not require stakes or other subsurface disturbance. Given the limited physical footprint of the proposed Plan and the temporary and reversible nature of the involved traps, the Proposed Project would not cause an adverse change in significance of a historical resource defined in Section 15064.5 of the CEQA Guidelines. Therefore, there would be no impact to historical resources.

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

Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history."

As noted above, physically, the proposed Plan would be limited to the setting traps and removing problem coyotes that are deemed to be a threat to human health; the education and enforcement components of the Plan would not result in any physical changes to the environment. As described in Section 7.a.), the traps would have a small physical footprint, with the traps sitting atop the ground and requiring no digging or subsurface work. Therefore, the act of setting traps and removing problem coyotes would not impact the significance of an archaeological resource defined in Section 15064.5(a)(3)(D) of the CEQA Guidelines.

²⁹ California Department of Fish and Wildlife, *California Regional Conservation Plans* (HCP and NCCP), available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, 2017.

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

A large portion of the City is underlain by alluvium eroded from the San Gabriel Mountains to the north. Alluvial deposits in the City range from the Holocene and Pleistocene ages, including Quaternary Old Alluvial Deposits. Although Quaternary Old Alluvial Deposits in general have the potential to yield fossils, the paleontological sensitivity in the developed portion of the City is considered low due to the proximity to the mountains to the north. Since the older Quaternary alluvial sediments are close to the sediment source, the uppermost layers of these deposits are likely too coarse-grained to preserve fossils. Small portions of the City extend north into the foothills of the San Gabriel Mountains and extend west into the hills west of the Arroyo Seco, where deposits are from the Mesozoic age and potentially older.³⁰

The physical impact of the Proposed Project is limited to setting and maintaining temporary coyote traps on an as-needed basis; the education and enforcement components of the Plan would not result in any physical changes to the environment. No grading would be required as implementation of the Plan would involve cage traps, which are placed on the ground and do not require subsurface disturbance. The act of setting and maintaining the trap, which has a small physical footprint and is in place for a limited amount of time, would not directly or indirectly destroy a unique paleontological resource or a unique geologic feature. Therefore, there would be no impact to paleontological resources.

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

The physical impact of the Proposed Project is limited to setting and maintaining temporary coyote traps on an as-needed basis; the education and enforcement components of the Plan would not result in any physical changes to the environment. No grading would be required as the involved traps are cages that sit at the surface. As previously described, the physical footprint of the traps would be small, and the traps are typically placed for a short amount of time. The act of setting and maintaining a coyote trap would not disturb any human remains. In addition, the proposed Plan would not conflict with or obstruct the implementation of California Health and Safety Code Section 7050.5, which requires the County Coroner to make findings as to the origin and disposition of any discovered human remains pursuant to Public Resources Code Section 5097.98. Therefore, the proposed Plan would not disturb any human remains.

8. **ENERGY.** Would the proposal:

a. *Conflict with adopted energy conservation plans?*

The Pasadena Municipal Code (PMC), Title 13, Chapter 13.08 Energy Use Conservation provides conservation requirements for property and business owners when using outdoor and indoor lighting, air conditioning, and other appliances. Further, the City has a Green Building Program, which requires development to comply with the amended 2016 edition of the California Green Building Standards Code (PMC Section 14.04.500) and the 2016 California Energy Code. As the Proposed Project would not include development of any permanent structures or involve lighting or air conditioning, these energy conservation requirements are not applicable. Further, the Proposed Project would not interfere with the City's energy saving programs, such as the Home Improvement Program and the Pasadena Department of Water and Power's Rebate programs. As a result,

³⁰ California Geological Survey, *Geological Compilation of Quaternary Surficial Deposits in Southern California. Los Angeles 30' x 60' Quadrangle*, 2012.

implementation of the Plan would not conflict with any City-adopted energy conservation plan, and there is no impact in relation to energy conservation.

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

The Proposed Project would result in the short-term consumption of petroleum-based energy products to power the vehicles used to transport CDFW staff or the City's state-permitted, contracted trapper to and from coyote removal sites, as well as the limited number of trips generated by outreach and education activities, such as public meetings or technical assistance site visits. The level of consumption attributable to the Proposed Project would not create a high enough demand to require the development of new energy sources or result in a significant reduction in available supplies. While it is expected for the urban coyote population in and around Pasadena to increase and decrease over time, the number of site visits by trapping officials or outreach professionals is not expected to substantially increase in the future. As a result, the amount of petroleum-based energy products used to power vehicles transporting agents of CDFW or the City's state-permitted, contracted trapper for the Proposed Project, as well as those associated with the limited number of trips generated by any outreach and education activities, would be less than significant.

9. GEOLOGY AND SOILS. Would the project:

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

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

Fault rupture is caused by the actual breakage of the ground surface overlying a fault as a result of seismic activity. This can range in offsets from less than one inch to up to 20 feet, depending on the fault and earthquake magnitude. Under the Alquist-Priolo Earthquake Fault Zone Act, the California State Geologist identifies areas in the State that are at risk from surface fault rupture. The main purpose of the Act is to prevent construction of buildings used for human occupancy where traces of active faults are evident on the Earth's surface. Active faults are those that have moved at least once in the last 11,000 years and are considered capable of generating earthquakes in the future.³¹ These zones are known as Alquist-Priolo Earthquake Fault Zones. Impacts resulting from fault rupture generally occur within the immediate vicinity overlying the fault. The zones vary in width, but average about one-quarter mile across.

According to the Safety Element (2002) of the City's General Plan, the San Andreas Fault is an active fault that controls seismic hazard in Southern California. This fault is located approximately 21 miles north of Pasadena and is identified by the Safety Element as having the highest probability of causing an earthquake. In the immediate area, the main faults include the Sierra Madre fault, which extends across the City's northern boundary, the Raymond fault, which extends into the City's southern and eastern boundaries, and the Eagle Rock fault, which extends across the southwestern portion of the City. The County of Los Angeles and the City of Pasadena are both affected by Alquist-Priolo Earthquake Fault Zones. The City of Pasadena is contained within four U.S. Geological Survey (USGS) topographic map quadrangles. The Los Angeles and the Mt. Wilson USGS Quadrangles were mapped for earthquake fault zones under the Act in 1977. The Pasadena and Condor

³¹ Pasadena, City of, *General Plan Safety Element*, August 2002.

Peak USGS Quadrangles have not yet been mapped per the Act. These Alquist-Priolo maps show only one fault zone in or adjacent to the City, the Raymond (Hill) Fault Alquist-Priolo Earthquake Fault Zone. This fault is located primarily south of City limits; however, the southernmost portions of the City lie within the fault's mapped fault zone. In addition, the Safety Element (2002) of the City's General Plan identifies the following three additional zones of potential fault rupture in the City³²:

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

While the Proposed Project would take place within the seismically active region of Southern California, it would not involve a physical footprint beyond the temporary placement of coyote traps; the education and enforcement components of the Plan would not result in any physical changes related to geology and soils. Given that the Proposed Project does not involve habitable structures or grading, the Proposed Project would not expose people or structures to any threats associated with the above-described fault zones, and there would be no impact related to fault rupture.

ii. *Strong seismic ground shaking?*

As with most locations in Southern California, the Project Site is susceptible to seismic ground shaking emanating from causative faults during an earthquake. Seismic activity along the San Andreas, Raymond, Eagle Rock, and Sierra Madre faults, or on any other of the numerous faults within the Southern California area, could affect the Proposed Project and would be considered during Project design.

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

However, the Proposed Project would not exacerbate the risk of earthquake damage from strong seismic ground shaking because the Proposed Project does not involve any grading or the placement of permanent structures for human habitation. Therefore, the Proposed Project would result in no impacts due to strong seismic ground shaking.

³² Pasadena, City of, *General Plan Safety Element, Technical Background Report*, August 2002.

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

Liquefaction typically occurs when near-surface saturated, clean, fine-grained, loose sands are subject to intense ground shaking causing the water that fills the pores to increase in pressure. This causes the soil to lose strength and behave as a liquid.³³ The potential for liquefaction depends on the magnitude of ground shaking, groundwater conditions, the relative density of the soils, and the age of site-specific geologic units. Seismic-induced liquefaction occurs when a saturated, granular deposit of low relative density is subject to extreme shaking and loses strength or stiffness due to increased pore water pressure. The consequences of liquefaction are typically characterized by settlement, uplift of structures, and increases in the lateral pressure of buried structures. If building foundations are not designed properly, the effects of severe liquefaction during seismic conditions may result in structural failure, leading to substantial structural damage and injury or loss of life.

While portions of the City are within liquefaction zones,³⁴ the Proposed Project would not exacerbate the risks of seismic related ground failure or liquefaction. The proposed Plan would not involve a physical footprint beyond the temporary placement of coyote traps; the education and enforcement components of the Plan would not result in any physical changes related to geology and soils. Therefore, the Proposed Project not expose people or structures to any threats associated with ground failure, and there would be no impact related to liquefaction.

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

While portions of the City are within landslide hazard zones,³⁵ the Proposed Project would not exacerbate the risks of landslides. The proposed Plan would not involve a physical footprint beyond the temporary placement of coyote traps; the education and enforcement components of the Plan would not result in any physical changes related to geology and soils. Therefore, the Proposed Project not expose people or structures to any threats associated with ground failure, and there would be no impact related to landslides.

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

The physical impact of the Proposed Project would be limited to setting and maintaining temporary coyote traps on an as-needed basis and would not involve grading; the education and enforcement components of the Plan would not result in any physical changes related to geology and soils. As described in the Project Description, the physical footprint of the traps would be limited to placement of cage traps on the ground surface. The act of setting and maintaining the trap would not result in a substantial soil erosion or loss of topsoil; therefore, there would be no impact related to soil erosion or the loss of topsoil.

³³ Pasadena, City of, *General Plan Safety Element*, August 2002.

³⁴ Pasadena, City of, *General Plan Safety Element, Technical Background Report*, August 2002.

³⁵ Pasadena, City of, *General Plan Safety Element, Technical Background Report*, August 2002.

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

The City rests primarily on an alluvial plain. To the north, the San Gabriel Mountains are relatively new in geological time. These mountains run generally east-west and have the San Andreas Fault on the north and the Sierra Madre Fault to the south. The action of these two faults, in conjunction with the north-south compression of the San Andreas tectonic plate, is pushing up the San Gabriel Mountains. This uplifting combined with erosion has helped form the alluvial plain. As shown on Plate 2-4 of the Technical Background Report to the Safety Element (2002) of the City's General Plan, the majority of the City lies on the flat portion of the alluvial fan, which is expected to be stable.³⁶

The physical impact of the Proposed Project would be limited to setting and maintaining temporary coyote traps on an as-needed basis and would not involve grading; the education and enforcement components of the Plan would not result in any physical changes related to geology and soils. The act of setting and maintaining the trap, which has a minimal superficial footprint and is in place for a limited amount of time, would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. As a result, there would be no impact related to unstable soils.

- d. *Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?*

The majority of the City is underlain by alluvial material from the San Gabriel Mountains.³⁷ This soil consists primarily of sand and gravel and is in the low to moderate range for expansion potential. The physical aspect of setting traps, which would include placing cage traps directly on the ground, would neither exacerbate nor be subject to the risks of expansive soils; the education and enforcement components of the Plan would not result in any physical changes related to geology and soils. As such, there would be no impact related to expansive soils.

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

The Proposed Project would not create any new structures requiring use of septic tanks or waste water disposal systems. Therefore, soil suitability for septic tanks or alternative wastewater disposal systems is not applicable to the Proposed Project, and no impact would occur.

³⁶ Pasadena, City of, *General Plan Safety Element, Technical Background Report*, August 2002.

³⁷ Pasadena, City of, *General Plan Safety Element*, August 2002.

10. GREENHOUSE GAS EMISSIONS. Would the project:

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

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHG). Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), ozone, methane (CH₄), and nitrous oxide (N₂O). GHGs are emitted by both natural processes and human activities. In response to growing scientific and political concern with global climate change, California has adopted a series of laws and corresponding plans to reduce emissions of GHGs. The Proposed Project would produce a limited amount of GHGs when the City contracted, state-licensed animal trapping company, or trappers from the CDFW travel to the site of a reported aggressive or habituated coyote, as well as those trips generated by any outreach and education activities, such as public meetings. As this travel would be expected to be infrequent and would be limited to light vehicles already required to adhere to State and federal emissions laws, the production of GHG through this Proposed Project would be less than significant.

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

Statewide, California has adopted multiple regulations for the purpose of reducing GHG emissions. AB 32 was enacted in 2006 to reduce statewide GHG emissions to 1990 levels by 2020. In 2016, Senate Bill (SB) 32 extended this commitment by raising the GHG emissions reduction target to 40 percent below 1990 levels by 2030. Executive Order S-3-05 provides the State-wide target to reduce emissions to 80 percent below 1990 levels by 2050.

In 2018, the City adopted a Climate Action Plan (CAP) to analyze GHG emissions at a programmatic level within the City; to outline a strategy to reduce and mitigate municipal, as well as community-wide GHG emission; and to demonstrate the City's commitment to achieving state-wide emissions reduction targets. This CAP is a qualified GHG reduction plan consistent with CEQA Guidelines Section 15183.5. The City also adopted a Green City Action Plan in 2006, which is a comprehensive environmental action plan that guides the City towards sustainability and which will accelerate the City's environmental commitment. The Green City Action Plan contains a wide range of initiatives that form a strategy towards fulfilling the ambitions of the United Nations Urban Environmental Accords of 2005, which acknowledges the environmental challenges and opportunities facing urban areas across the globe.

The Proposed Project would not involve the construction of any structures or result in significant GHG emissions. As a result, the Proposed Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions, and there would be no impact related to GHG emissions.

11. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

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

There are no construction activities associated with the Proposed Project; therefore, there would not be any construction- or grading-related transport, use, or disposal of hazardous materials that could create a significant hazard to the public. The education and enforcement components of the Plan would not result in the use of hazardous materials. In the event that a coyote is determined to be a threat to human health and safety, the Plan provides a tiered response plan displaying how the City would act in the event of human and coyote interactions of varying severity. If the tiered response plan in the Plan results in the City's decision to remove the animal, the CDFW or the City's contracted trapping agency would locate, remove, and dispose of the coyote. Disposal of the animal carcass would be done in accordance with California Code of Regulations, Title 14, Section 679, Possession of Wildlife and Wildlife Rehabilitation, which states that licensed agencies involved in trapping and rehabilitating wildlife must have a documented animal intake process, euthanasia protocol, and plans for carcass disposal approved by CDFW. Since there are no construction activities, and the transport of coyote carcasses will be done in accordance with California Code of Regulations Title 14, there would be no impact related to the routine transport, use or disposal of hazardous materials.

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

The Proposed Project would not create a hazard through upset or accident conditions involving hazardous materials. There are no uses or storage of hazardous materials associated with the Proposed Project. Therefore, there is no hazard to the public or the environment through reasonably foreseeable upset and accident conditions, which could release hazardous material. There would be no impact related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

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

There are no uses, storage, emissions, or handling of hazardous materials associated with the Proposed Project. Therefore, there would be no hazard related to hazardous emissions or handling of hazardous materials within one-quarter mile of an existing or proposed school.

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

There are two sites within the City of Pasadena listed the State of California Hazardous Waste and Substances Sites List published by the California Department of Toxic Substances Control (DTSC)³⁸. These include the Jet Propulsion Laboratory Federal Superfund site and the Naval Information Research Foundation State Response site. Trapping of problem coyotes that are deemed to be a threat to human health and safety would only occur on public land, unless the City is provided permission to trap on private property. Setting the traps would involve placing cages directly on the ground surface, resulting in no ground disturbance. As such, trapping activities would not disturb any existing hazardous material below the ground surface. Further, as human-coyote interactions often occur in or near residential areas, trapping on non-residential, hazardous materials sites would not be likely. As such, no impacts would occur as a result of the Proposed Project.

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

The nearest airport to Pasadena is the San Gabriel Valley Airport, in El Monte, CA, which is approximately four miles southwest of the Pasadena city limits. The Hollywood Burbank Airport (legally, the Bob Hope Airport) in Burbank, California, is approximately nine miles from the western edge of the City. Therefore, activities associated with the Proposed Project occurring within the City would not result in a safety hazard for people residing or working near an airport. No impact would occur.

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

There are three privately owned heliports in Pasadena at the Huntington Hospital, the California Institute of Technology, and the Pasadena Police Department. However, there are no private airstrips within the City. Therefore, the activities associated with the Proposed Project would not result in a safety hazard for people residing or working in the vicinity of a private airstrip, and no impact would occur.

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

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

³⁸ California Department of Toxic Substances Control (DTSC), *State of California Hazardous Waste and Substances Site List*, available at https://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm, accessed August 17, 2018.

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.³⁹ 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. In case of a disaster, the Pasadena Fire Department is responsible for implementing the plan, and the Pasadena Police Department devises evacuation routes based on the specific circumstance of the emergency.

There would be no construction associated with the Proposed Project, and, therefore, there would be no permanent or temporary physical barriers on any existing public streets or evacuation routes. As such, the Proposed Project would not interfere with any adopted emergency response plan or evacuation plan, and no impact would occur.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

As shown on Plate P-2 of the Safety Element of the City's General Plan, portions of Pasadena that are designated as very high or moderate fire hazard zones include: areas west of the Arroyo Seco, the eastern slopes of the Arroyo Seco, the upper reaches of both the Arroyo Seco and Eaton Canyon, Hastings Ranch and Kinneloa Mesa areas in the northeast portion of the City, and areas to the south near the Oak Knoll neighborhood area.⁴⁰ These areas are typically less densely developed and contain potential habitat and prey species for the animals identified in the City's Plan. The Proposed Project would create a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety (e.g., when the animals exhibit signs of illness, aggression, or habituation). Since these areas of very high and moderate fire hazard exist at the transition between urban development and less-developed natural areas, it is likely that trapping problem coyotes may be required in these areas. The Proposed Project does not involve any activities that would exacerbate wildfire risks. The Proposed Project would not develop any permanent structures in these areas or expose any people to significant risk of loss associated with wildland fires through the process of setting the coyote traps. As such, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wild land fires, and no wildland fire impacts would occur as a result of the proposed project.

12. HYDROLOGY AND WATER QUALITY. Would the project:

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

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. It does not involve the discharge of water or wastewater and, thus, would not violate any water quality or waste discharge requirements. The project would have no impact water quality.

³⁹ Pasadena, City of, *Emergency Operations Plan*, 2011.

⁴⁰ Pasadena, City of, *General Plan Safety Element*, August 2002.

- b. *Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?*

The Proposed Project would not involve the use of groundwater or the withdrawal of groundwater. As such, the Proposed Project would have no impact related to groundwater supplies.

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

The Proposed Project would not result in land modification. Trapping and removal of coyotes that are deemed to be hazards to human health and safety would be conducted with cage traps placed directly on the ground. Further, the Proposed Project would not lead to indirect modification of land through the approval of policies that may encourage land disturbance. Therefore, the Proposed Project would not alter any drainage patterns, streams, or rivers and would not result in erosion or siltation on- or off-site. As such, the Proposed Project would have no impact related to erosion or siltation.

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

Please see response to Section 12.c) of this Initial Study. The Proposed Project would not result in land modification. Therefore, it would not alter the drainage pattern of a site or area and would not increase the rate or amount of surface runoff. There would be no impact related to surface runoff.

- e. *Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

The Proposed Project would not involve the creation of runoff and, thus, would not cause an exceedance of the capacity of any existing or planned drainage system. The Proposed Project would have no impact related to stormwater runoff.

- f. *Otherwise substantially degrade water quality?*

The Proposed Project would not involve any actions that would either directly permit or indirectly encourage the use or discharge of water or the alteration of land. The Proposed Project would not involve the use of any chemicals or substances that could either be directly or accidentally released into the water stream. Therefore, the Proposed Project would have no impact related to the degradation of water quality.

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

The Proposed Project would not involve the construction or placement of any housing and, therefore, would have no impact as it relates to placing housing within a 100-year flood hazard area.

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

The Proposed Project would not involve the construction or placement of any structures and, therefore, would have no impact in relation to placing a structure within a 100-year flood zone that would impede or redirect flood flows.

- i. *Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?*

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. Project implementation would not involve the permanent placement of people or structures that would be exposed to significant risk of loss involving flooding or exacerbate any flooding risks. Thus, the Proposed Project would have no impact related to flooding.

- j. *Inundation by seiche, tsunami, or mudflow?*

The Proposed Project would not involve any permanent change to the physical environment. Therefore, the Proposed Project would not introduce any new population in an area subject to inundation by seiche, tsunami, or mudflow. As such, the Proposed Project would have no impact related to inundation.

13. LAND USE AND PLANNING. Would the project:

- a. *Physically divide an existing community?*

The physical division of an established community is typically associated with construction of a linear feature, such as a divided highway, or removal of a means of access, such as a local road or bridge, which would impair mobility within an existing community or between a community and an outlying area. The Proposed Project would not result in the construction of any structures or the alteration of land that could result in such a physical division. Thus, the Proposed Project would have no impact.

- b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

The City of Pasadena's General Plan, Open Space and Conservation Element identifies areas as "wild open space", which are defined as being completely undeveloped (apart from some trails) and used for wildlife habitat and conservation.⁴¹ The Open Space and Conservation Element further identifies goals and objectives related to wildlife, native plants, and the urban forest. The Proposed Project directly supports two of these goals and objectives, which are: "balance urban wildlife and habitat with public health and safety," and "reduce attractive nuisances for wildlife."⁴² There are no other plans or policies that are applicable to the management of urban wildlife, and, therefore, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and there would be no impact.

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

There are no adopted Habitat Conservation or Natural Community Conservation Plans within the City. There are also no approved local, regional or state habitat conservation plans within the City.⁴³ As a result, the Proposed Project would not conflict with any applicable habitat conservation plans or natural community conservation plans, and there would be no impact.

14. MINERAL RESOURCES. Would the project:

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

Mining activities in California are regulated by the Surface Mining and Reclamation Act of 1975 (SMARA). SMARA provides for the reclamation of mined lands and directs the State Geologist to classify and map mineral resources to show where economically significant mineral deposits occur or are likely to occur. Areas known as Mineral Resource Zones (MRZ) are classified according to the presence or absence of significant deposits. The majority of the City is within MRZ-3, which are areas of undetermined mineral significance, with limited areas along the Arroyo Seco, and Eaton Wash within MRZ-2, which are areas underlain by mineral deposits where geologic data indicate that significant measured, or indicated, resources are present.⁴⁴

The Proposed Project would include temporary placement of cage traps directly on the ground surface; the education and enforcement components of the Plan would not result in any physical changes to the environment. This minimal physical footprint would not result in the excavation or loss of any mineral resources that would be of value to the region and the residents of the State. As such, the Proposed Project would have no impact.

⁴¹ Pasadena, City of, *General Plan, Open Space and Conservation Element*, 2012.

⁴² Pasadena, City of, *General Plan, Open Space and Conservation Element*, p 27, 2012.

⁴³ California Department of Fish and Wildlife, Conservation Planning Division, *California Regional Conservation Plans (NCCP, HCP)*, 2017.

⁴⁴ California Geological Survey, *Generalized Aggregate Resource Classification Map, Plate 3*, available at ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartIII/Plate_3-1.pdf, accessed August 17, 2018.

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

As stated in Section 14.a) of this Initial Study, the Proposed Project would include temporary, limited land modification, which would occur when setting traps to impound coyotes determined to be a threat to public safety; the education and enforcement components of the Plan would not result in any physical changes to the environment. As such, the Proposed Project would not include placement of permanent structures or a permanent use/occupation of any site. Therefore, the Proposed Project would not result in the loss of availability of a locally-important mineral resource recovery site.

15. NOISE. Will the result in:

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

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. Project implementation would not involve or otherwise permit noise generating activities, and the proposed Plan does not contain policies that encourage an increase in noise generating activities. Thus, the Proposed Project would have no impact as it relates to exposing persons to or the generation of noise levels in excess of standards established in the Pasadena General Plan or Noise Restrictions Ordinance.

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

The Proposed Project would not involve the construction or operation of any structures or vibration generating facilities. Physical activities are limited to setting and monitoring traps and the interactions between the trappers and/or wildlife professionals and coyotes; the education and enforcement components of the Plan would not result in any physical changes to the environment. As such, the Proposed Project would have no impact as it relates to exposing persons to or generating excessive groundborne vibration.

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

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. Any noise related to the Proposed Project would be limited to setting wildlife traps and any interactions between trappers and urban wildlife, as well as to those limited trips generated by any public meetings related to outreach and education. The Proposed Project would not permit or encourage any noise generating activities. No permanent increase in ambient noise would occur with implementation of the Plan, and there would be no noise impact.

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

As stated, any noise related to the Proposed Project would be limited to setting wildlife traps and any interactions between trappers and urban wildlife, as well as to those limited trips generated by any public meetings related to outreach and education. The Proposed Project would not permit or encourage any noise generating activities. No perceptible temporary or periodic increase in ambient noise would occur with implementation of the Plan, and noise impact would be less than significant.

- e. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The City is not within an airport land use plan, and the nearest commercial airport to Pasadena is the Hollywood Burbank Airport (legally the Bob Hope Airport), which is approximately nine miles from the nearest City boundary line. The San Gabriel Valley Airport, a public use general aviation airport located in El Monte, is approximately four miles to the southeast of the City boundary. The Proposed Project would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. Therefore, the Proposed Project would not involve the exposure of people to excessive noise levels, and the Proposed Project would have no impact related to airport noise.

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

There are no private airstrips within the Pasadena City boundaries.⁴⁵ As stated in Section 11.f) and Section 15.e) of this Initial Study, the Proposed Project would involve temporary placement of traps to capture coyotes determined to be threats to public safety. As such, the Proposed Project would not place people in the vicinity of a private airstrip, and the Proposed Project would have no impact related to airstrip noise.

16. POPULATION AND HOUSING. Would the project:

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

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would

⁴⁵ Toll Free Airline, *Los Angeles County Public and Private Airports*, available at <http://www.tollfreeairline.com/california/losangeles.htm>, accessed August 15, 2018.

include trapping and removal of coyotes deemed to pose a threat to public health and safety. The Proposed Project would not involve any activities or permit any activities that would directly or indirectly induce population growth in the area. As such, the Proposed Project would have no impact related to population growth.

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

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. The physical impact of the Proposed Project would be limited to setting traps to remove an habituated or aggressive coyote(s), as described in the Project Description; the education and enforcement components of the Plan would not result in any physical changes to the environment. Therefore, the Proposed Project would not involve any actions that displace housing, and the Project would have no impact related to displacement.

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

As stated above, the physical impact of the Proposed Project would be limited to setting and maintaining temporary, wildlife traps on an as-needed basis to capture coyotes that are determined to be threats to public safety; the education and enforcement components of the Plan would not result in any physical changes to the environment. Therefore, the Proposed Project would not involve any actions that displace people, and the Project would have no impact related to displacement.

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

a. *Fire Protection?*

Impacts to fire protection services are typically associated with an increase in population, service area, or unique development. The Proposed Project would not increase the population, extend the service area boundaries, or introduce any new or unique development. The Proposed Project would not encourage activities that would require the need for fire protection services. In the unlikely event that activities, such as trapping or teaching residents how to haze coyotes result in physical harm, there may be an individual need for paramedic/fire services. If such a situation should occur, it would be an isolated individual incident and would not pose a unique emergency requiring special equipment or staff. These calls can be accommodated by the existing stations and response teams. As a result, impacts to fire protection services would be less than significant.

b. *Libraries?*

The Proposed Project would not involve any activities that would increase Pasadena's population and generate a need for additional library services. However, the Proposed Project would include public outreach and education; thus, there may be a limited demand for library services if public meetings utilize library space. Public outreach and education events associated with the Proposed Project would be infrequent. Further, public meetings are anticipated to be accommodated by the existing library facilities around Pasadena; therefore, the Proposed Project would not result in any one City library branch being burdened due to the use of public meeting space. Therefore, impacts to libraries would be less than significant.

c. *Parks?*

The Proposed Project would not increase population that would correspondingly create a demand for additional park services or programs, and the Proposed Project would not involve the construction of any new parks. However, having a solidified policy that defines agency roles and the education of the public on proper response in the event of an encounter with wildlife would provide for safer park experiences. The proposed Plan and the policies contained within do not promote the use of parks and would have no impact on acceptable or established parkland acres per population ratios. Therefore, the Proposed Project would have no impact related to parks.

d. *Police Protection?*

Through the public outreach and education components of the proposed Plan, the public would become aware of the protocol for alerting the proper agencies in the event of incident or interaction with urban wildlife. This may in fact lessen the need for the Pasadena Police Department to respond to calls concerning persons having interactions with urban wildlife. Overall, the proposed Plan is not anticipated to result in an increased need for police services, and no new or physically altered police facilities would be required to maintain acceptable police protection. Therefore, no impact to police protection services would occur.

e. *Schools?*

The Proposed Project would not involve any activities that would induce population growth in Pasadena or increase student enrollment numbers within area schools. Therefore, the Proposed Project would not generate the need for construction of new school facilities. School facilities, such as gyms or cafeterias, may provide meeting space for public outreach efforts; thus, similar to libraries, the public outreach component may require the use of school facilities for public meetings. These events are expected to occur separate of school instructional hours and would only occur in schools when they can be accommodated by the existing school facilities. Thus, there would be no impact to schools.

f. *Other public facilities?*

As described in Sections 17.a) through 17.e) of this Initial Study, the Proposed Project would not induce population growth or burden existing public service systems such that construction of additional public service facilities would be required. As such, no other public facilities would be impacted by Project implementation.

18. RECREATION.

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

The Proposed Project would not increase the City's population or increase the programming or recreational opportunities at any parks to the point that physical deterioration would occur. Any increase in park usage, such as outreach events or coyote hazing tutorials, would be infrequent and would have a negligible effect on the physical deterioration of park facilities given the current level of park usage and the City's existing park maintenance programs. Therefore, the impact would be less than significant.

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

The Proposed Project would not involve construction or expansion of recreational facilities, and, as such, no physical effect on the environment would occur.

19. TRANSPORTATION/TRAFFIC. Would the project:

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

The Proposed Project does not involve activities that would generate vehicle trips, except for the occasional trips to set and monitor wildlife traps and of the trips generated by any public meetings that may be included as part of the outreach and education components of the Plan. Any trips related to setting and monitoring traps would be nominal (e.g., one inbound trip and one outbound trip for each visit, with visits occurring approximately once per day for the temporary duration the trap is in place). Any public meetings would be single events and would not contribute to permanent or regular increases in daily traffic. Given the limited number and temporary nature of any vehicular trips generated by the proposed Plan, the Proposed Project would not conflict with any applicable plans, ordinances, and policies regarding performance of the transportation system. The Proposed Project would have no impact related to transportation.

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

The only vehicle trips resulting from the Proposed Project would be from staff of the CDFW, PHS, or the City-contracted trapping company traveling to and from areas where problem coyotes have been reported, as well as any trips generated through the public outreach and education efforts by the City. These activities would not result in permanent or regular increases in the number of trips at Pasadena area intersections. Therefore, the Proposed Project would not 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. The Proposed Project would have no impact related to traffic congestion.

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

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. The Proposed Project would not involve any actions that would alter air traffic patterns, and, as such, the Proposed Project would have no impact related to air traffic patterns.

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

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. As such, the physical impact of the Proposed Project would be limited to setting and maintaining temporary, wildlife traps on an as-needed basis; the education and enforcement components of the Plan would not result in any physical changes to the environment. The Proposed Project would not introduce any design features. Therefore, the Proposed Project would have no impact related to a design hazard.

- e. *Result in inadequate emergency access?*

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. As such, the physical impact of the Proposed Project would be limited to setting and maintaining temporary, coyote traps on an as-needed basis; the education and enforcement components of the Plan would not result in any physical

changes to the environment. The Proposed Project would not introduce any obstacles that would hinder emergency access throughout the City, and, as such, the Proposed Project would have no impact related to emergency access.

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

The Proposed Project would not introduce significant new sources of traffic; either on roadways or on alternative transportation routes or facilities, that would conflict with adopted plans, policies, or programs regarding transit, bicycle, or pedestrian facilities. The Proposed Project would have no impact in relation to this issue.

20. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, place, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American Tribe, and that is:

- a. *Listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).*

The physical impact of the Proposed Project would be limited to setting and maintaining temporary, wildlife traps on public land (or private land if permission is granted). The traps would not result in any ground disturbance as they are placed directly on the ground and are not secured with stakes. Therefore, the physical footprint of the Proposed Project would be minimal and would not involve any activities that would disturb or alter or encourage any actions that would otherwise have the potential affect a tribal cultural resource that is listed or eligible for listing on the California or local register. The Proposed Project would have no impact on tribal cultural resources.

- b. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant in accordance with criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.*

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. As stated in the Project Information section of this Initial Study, one tribe, the Gabrieleño Band of Mission Indians – Kizh Nation, requested to be notified of projects within the City of Pasadena. In accordance with AB 52, the City sent a letter to the Kizh Nation on January 8, 2019, notifying them of the Proposed Project. The Tribe responded to the City on January 17, 2019, requesting consultation. Consultation between the City and the Kizh Nation occurred and was completed on April 24, 2019. The Kizh Nation concurred that because the Proposed Project would not involve physical ground disturbance other than the placement of traps directly on the ground (without the use of stakes), the Proposed Project would have no impact on tribal cultural resources, and no mitigation measures would be necessary.⁴⁶

⁴⁶ Gabrieleño Band of Mission Indians – Kizh Nation, E-mail Correspondence to Mr. Brent Maue and Ms. Cynthia Ramos Regarding AB52 Consultation – Urban Wildlife Management Plan_Pasadena, April 24, 2019.

21. UTILITIES AND SERVICE SYSTEMS. Would the project:

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

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. The Proposed Project would not result in the generation of wastewater or discharges into the sewer system. As a result, on the Proposed Project would not cause an exceedance of the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board. There would be no impact related to wastewater treatment.

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

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. Implementation of the Proposed Project would not result in the use of water or the generation of wastewater. Thus, the Proposed Project would not result in the need for the construction of new or expanded water or wastewater treatment facilities, and the Project would have no impact related to water or wastewater treatment facilities.

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

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. Project implementation would not involve any land alterations and would not cause an increase in impervious surfaces. As a result, the Proposed Project would not result in an increase the amount or velocity of stormwater runoff. Therefore, the Proposed Project would not require or result in the construction of new or expanded storm water drainage facilities, and no impact would occur.

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

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. Project

implementation would not require the use of water and, thus, would not affect the water supply; therefore, the Proposed Project would have no impact related to water supply.

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

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. The Proposed Project would not generate wastewater or require wastewater services. As such, the Proposed Project would have no impact related to wastewater treatment.

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

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. As stated in the Project Description, in the event that an animal is determined to pose a threat to human health and safety and is, therefore, trapped, removed, and disposed of, all waste would be disposed of in accordance with California state agencies, such as the CDFW, California Department of Food and Agriculture, and the CalEPA, as well as the California Code of Regulations Title 14. CalEPA identifies four methods for disposing of animal carcasses through the CalEPA Emergency Animal Disposal Guidance, which include rendering, landfilling, burial, and composting. Based on the CalEPA Guidance, landfilling would be the best environmental solution for activities, such as the Proposed Project, since animal rendering is a treatment primarily reserved for livestock carcasses.⁴⁷ According to the County of Los Angeles Countywide Integrated Waste Management Plan 2016 Annual Report, the County of Los Angeles has a permitted landfill capacity of over 103 million tons.^{48,49} As coyote removal activities within the City of Pasadena has only resulted in the removal of four coyotes between 2013 and 2018, and because coyote removal is not anticipated to substantially increase beyond historical levels, the amount of waste in the form of animal carcasses anticipated to be generated by the Proposed Project can be accommodated by the existing permitted capacity of the area's landfills. Impacts are less than significant.

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

The Proposed Project is an urban wildlife management plan for the City, which would consist of public education around co-existing with wildlife; enforcement of existing laws prohibiting wildlife feeding; and a tiered

⁴⁷ California Veterinary Compliance Assistance, *California: Carcass Disposal State Regulations*, Website, available at <http://www.vetca.org/lacd/ca-lacd.php> and accessed on March 11, 2019.

⁴⁸ County of Los Angeles, Department of Public Works, *County Integrated Waste Management Plan; 2016 Annual Report*, September 2017.

⁴⁹ The statistic "103 million tons of capacity" refers to remaining disposal capacity of Class III landfill facilities within Los Angeles County at the end of 2016, representing the most recent available data.

classification and response system for addressing human-coyote interactions within the City, which would include trapping and removal of coyotes deemed to pose a threat to public health and safety. The Proposed Project would, to a limited extent, involve removal of biological waste after wild animals are euthanized. As stated in Section 21.f) of this Initial Study, all waste would be disposed of in accordance with California state agency regulations, such as those promulgated by the CDFW, CalEPA, and California Department of Food and Agriculture. Further, as stated in Section 21.f) of this Initial Study, animal carcass disposal that would be required during implementation of the Proposed Project would not substantially impact the capacity of Los Angeles County landfills. Therefore, adherence to the above-mentioned State Agency regulations regarding solid (biological) waste disposal, would ensure that the Proposed Project would have no impact related to any solid waste regulations.

22. MANDATORY FINDINGS OF SIGNIFICANCE.

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

The Proposed UWMP describes the City's three-pronged strategy for managing wildlife within City boundaries, which consists of:

1. public education designed around co-existence with wildlife;
2. enforcement of laws and regulations prohibiting the feeding of wildlife; and
3. ensuring public safety by implementing appropriate, tiered responses to wildlife and human interactions.

The wildlife species covered by the proposed Plan include coyotes (*canis latrans*), American black bear (*ursus americanus*), cougar (*puma concolor*), as well as on smaller mammal species such as opossums, raccoons, skunks, bobcats, and bats, which can carry zoonotic diseases that can be a threat to human health. All of the above-mentioned mammals other than coyotes would be the focus of an outreach and education campaign focusing on how to minimize the probability of human-wildlife interactions and what to do in the case of an animal encounter or sighting. The Plan's third component, described above, includes the trapping and removal of coyotes that are deemed by the City to be a threat to human health and safety (using the tiered, response system described in the Project Description). As such, there would be no direct physical impact to the populations of the above-listed species populations other than coyotes as a result of this Proposed Project.

Regarding coyotes, without tracking and updated inventories in the area, it is not possible to know the exact size of the coyote population within and around Pasadena. Coyote habitat is common in rural and suburban environments; however, as described in the discussion of Existing Conditions in Section 9, Description of Project above, coyotes reside in densely urban environments as well. A radio collar study was conducted by the National Park Service, tracking urban coyotes in Los Angeles, in which it was observed that individual coyotes occupied densely populated areas, such as the Westlake and Silverlake neighborhoods of Los Angeles, rather than occupying nearby large open spaces. The study's authors also observed one coyote approach an intersection in the early morning hours, check both ways for vehicular traffic, then proceed to cross the street safely, which suggests that coyotes are fully integrating into urban environments.⁵⁰

⁵⁰ Brown, J., *Coyotes in the City: Results from a pilot study of GPS-collared coyotes in Downtown Los Angeles*, Lecture presented at Vertebrate Pest Conference, Urban Coyote Symposium, Newport Beach, CA, available at http://www.vpconference.org/Urban_Coyote_Symposium/, accessed August 15, 2018.

Coyote home ranges and territories primarily depend on the availability of food and water, as well as whether the coyote is paired with a mate (a "resident" coyote) or is not paired with a mate (a "transient" coyote). In natural habitats, coyotes typically have home ranges of 10 square kilometers (km²) for resident coyotes and up to 84 km² for transient coyotes.⁵¹ Similar findings of research conducted in the late 1980s in rural southeastern Colorado found home ranges of 11 km² for resident coyotes and up to 106 km² for transient coyotes.⁵² Coyotes that occupy urban environments often have smaller home ranges and territories; however, home ranges are heavily influenced by resource availability. Researchers found that resident coyote home ranges in urban environments varied between 2.27 km² and 6.04 km², while transient coyotes in urban environments had home ranges averaging 24.8 km².⁵³ This is influenced by food and water supplies found in urban environments. Food resources can be direct, such as feeding on human food waste and trash, or indirect, such as feeding on rodents and small mammals subsisting on human food and trash.

Coyotes typically live in small family groups but hunt alone or in pairs. This often gives the impression that coyotes do not have packs as they can be seen alone. Breeding pairs of coyotes mate and establish a den between January and April.⁵⁴ Common areas for dens include well-drained sites dug into the ground, usually within 0.5 mile of a water source and with some vegetative ground-cover.⁵⁵ These dens are only used in the pup-rearing phase, which lasts between May and August. Due to the vulnerability of pups during these months, coyotes can be aggressive toward perceived threats in close proximity to their den sites. If human contact is made near a coyote den, coyote pups are often moved to another den location, suggesting that coyotes have multiple den sites and that they are resilient to human interaction.⁵⁶

Following pup-rearing, juvenile coyotes become more independent and enter a phase of the life cycle called dispersal (between September and December), where they can either remain with their family groups, or they can venture out on their own. It is in the pup-rearing and dispersal portions of the year (between May and December), when the greatest number of human interactions with Coyotes occur.⁵⁷

Effect of management strategies on coyote population size

Lone, transient coyotes move in narrow, undefended zones that exist between pack territories searching for an open habitat to occupy or group to join. It is largely because of these transient coyotes, that local coyote eradication programs do not have a significant impact on population size. This is because if adequate resources are available in an area (i.e., food, water, habitat), and a group of territorial coyotes is removed, then transient coyotes or neighboring groups of territorial coyotes will fill the undefended area.

In a study conducted by the U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service on coyote populations on the Piñon Canyon Maneuver Site military installation in Southeastern Colorado, researchers found that lethal control measures on the coyote population did not have a sustained impact. This study found that the coyote populations were reduced by 44 to 61 percent and 51 to 75 percent in the two years

⁵¹ Kamler, J., Ballard, W., Lemons, P., Gilliland, R., and Mote, K., *Home Range and Habitat Use of Coyotes in an Area of Native Prairie, Farmland, and CRP Field*, *The American Midland Naturalist*, 153 (2), 396-404, 2005.

⁵² Gese, E., Rongstad, O., and Mytton, W., *Home Range and Habitat Use of Coyotes in Southeastern Colorado*, *The Journal of Wildlife Management*, 52 (4), 640-646, 1988.

⁵³ Gehrt, S., Anchor, C., and White, L., *Home Range and Landscape Use of Coyotes in a Metropolitan Landscape: Conflict or Coexistence?* *Journal of Mammalogy*, 90 (5), 1045-1057, 2009.

⁵⁴ Way, J., Auger, P., Ortega, I., and Strauss, E., *Eastern Coyote Denning Behavior in an Anthropogenic Environment*, *Northeast Wildlife*, (56), 18-30, 2001.

⁵⁵ Way, J., Auger, P., Ortega, I., and Strauss, E., *Eastern Coyote Denning Behavior in an Anthropogenic Environment*, *Northeast Wildlife*, (56), 18-30, 2001.

⁵⁶ Way, J., Auger, P., Ortega, I., and Strauss, E., *Eastern Coyote Denning Behavior in an Anthropogenic Environment*, *Northeast Wildlife*, (56), 18-30, 2001.

⁵⁷ Quinn, N., *An Examination of Citizen-Provided Coyote Reports: Temporal and Spatial Patterns and Their Implications for Management of Human-Coyote Conflicts*, Lecture presented at Vertebrate Pest Conference, Urban Coyote Symposium, Newport Beach, CA March 9, 2016.

that active management took place in the late 1980s.⁵⁸ The study author states that “[A]s expected, annual survival rates declined significantly for coyotes in the removal area compared to coyotes in the non-removal area.... However, both pack size and density rebounded to pre-removal levels within 8 months post-removal.” When accounting for changes in prey abundance, as well as coyote density, the size of coyote litters was significantly related to total prey abundance per coyote. In short, this data from the USDA suggests that prey abundance has a stronger impact on the population size of coyotes than does population management practices.

In the Los Angeles area, predator control programs targeting coyotes have existed since the 1930s when the Los Angeles County Board of Supervisors started a bounty program for coyotes after concerns that coyotes were negatively impacting the region’s poultry, livestock, and live game. The program was deemed ineffective, despite resulting in over 650 coyotes taken in an 8-month period.⁵⁹ Other active management programs existed in the following decades, such as a program that removed 500 coyotes and bobcats in 1955, and 73 coyotes between 1959 and 1961. Researchers conservatively estimated that a total of at least 2,700 coyotes were taken in the Los Angeles area from 1961 to 1971.⁶⁰ Following the fatal coyote attack of a young girl in Glendale in 1981, the Los Angeles County Agricultural Commissioner’s Office trapped and killed 55 coyotes over 80 days.⁶¹ Given the number of human and coyote interactions that are continuing to occur in Pasadena and surrounding areas, these past efforts did not reduce the population of coyotes in the greater Los Angeles area to a non-sustaining level, despite removing a large number of individuals from the population.

The Proposed Project is not an active management program aimed at reducing the coyote population but, instead, would result in the occasional removal of a coyote when one is reported as aggressive, habituated, or ill and could pose a threat to public safety. Historically, wildlife management in the greater Pasadena area has led to removal of 35 coyotes by the PHS over the last six years. Of these 35 coyotes euthanized between 2013 and 2018, only four coyotes have been removed from within the City. Given the history of coyote management programs in the Los Angeles area and the fact that coyote populations still thrive in the area despite removal of large numbers of coyote individuals, the occasional removal of coyote individuals through implementation of the proposed Plan would not cause the population of coyotes to drop below self-sustaining levels. As described in Section 4.a) through Section 4.d), the Proposed Project would not result in any ground disturbance and would therefore not impact fish or wildlife habitat or threaten to eliminate a plant or animal community. Further, as described in Section 5.a) through Section 5.c), the Proposed Project would not result in the elimination of important examples of the major periods of California history or prehistory. As such, implementation of the proposed Plan would have a less-than-significant impact, related to substantially reducing the habitat of a fish or wildlife species, causing a fish or wildlife population to drop below self-sustaining levels, threatening to eliminate a plant or animal community, reducing the range of a rare or endangered animal or plant, or elimination of important examples of the major periods of California history or prehistory.

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

The Proposed Project is a plan to guide City staff and the public in addressing urban wildlife issues within the City. Specifically, the Plan would describe the City’s strategy to manage wildlife, including creating public

⁵⁸ Gese, E.M., *Demographic and Spatial Responses of Coyotes to Changes in Food and Exploitation*, Proceedings of the 11th Wildlife Damage Management Conference, (D.L. Nolte, K.A. Fagerstone, Eds), 2005.

⁵⁹ Gill, D.A., *Coyote and the urban man: A geographical analysis of the relationship between the coyote and man in Los Angeles*, M.A. Thesis, University of California, Los Angeles, CA, 1965.

⁶⁰ Gill, D.A., and Bonnett, P., *Nature in the Urban Landscape: A Study of City Ecosystems*, York Press Inc., Baltimore, 1973.

⁶¹ Gill, D.A., *Coyote and the urban man: A geographical analysis of the relationship between the coyote and man in Los Angeles*, M.A. Thesis, University of California, Los Angeles, CA, 1965.

education programs designed around co-existence with wildlife, enforcing existing state and local laws prohibiting feeding of wildlife, and implementing a tiered response program aimed at removing and euthanizing, where necessary, coyotes that are deemed to be a threat to human health and safety. As stated in the Project Description, the PHS has been serving as the City Poundmaster for decades, removing and treating or (in necessary cases) euthanizing wildlife that is sick or injured. Historically, the PHS has removed 35 coyotes from the greater Pasadena area between 2013 and 2018. Four of these animals were removed from within the City's municipal boundary.

As described in Section 23.a) of this Initial Study, coyote populations are resilient in that population dynamics are more strongly influenced by prey populations than by direct population management efforts. The Proposed Project is not a population management effort; rather, the only coyotes that will be removed are those that are determined to be a threat to human health and safety. Further, there are no foreseeable projects within the City that would pose a direct threat to coyote populations. As a result, the Proposed Project would not have a considerable contribution to any significant cumulative impact. Thus, the Proposed Project's cumulative impacts are less than significant.

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

The Proposed Project is a plan to guide City staff and the public in addressing urban wildlife issues in the City. Based on the analysis in this Initial Study, the environmental impacts of the proposed Plan would be limited to less-than-significant effects related to GHG emissions, ambient noise levels, public services, utilities and service systems, recreation, and biological resources. Given the nature and magnitude of these impacts, none of these environmental effects would cause a substantial adverse effect on human beings and the Proposed Project would have no impact. Further, as identified by the analysis of the other issue areas in this Initial Study, the Proposed Project would not result in environmental affects which would cause substantial adverse effects on human beings, either directly or indirectly.

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Brent Schleck – Assistant Environmental Planner
Kara Palm – Environmental Planner

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**City of Pasadena
Environmental Health Services Division
1845 North Fair Oaks Avenue
Pasadena, California 91103**

PROPOSED NEGATIVE DECLARATION

PROJECT TITLE: City of Pasadena Urban Wildlife Management Plan

PROJECT APPLICANT: City of Pasadena

PROJECT CONTACT PERSON: Rachel Janbek, Environmental Health Services Division Manager

ADDRESS: Environmental Health Services Division, 1845 North Fair Oaks Avenue, Pasadena, CA 91103

TELEPHONE: (626) 744-6067.

PROJECT LOCATION:

The proposed project applies citywide and would encompass all areas within the City of Pasadena (Los Angeles County) and would encompass all areas within the City limits.

PROJECT DESCRIPTION:

The City of Pasadena Public Health Department is proposing to adopt a plan providing guidance for City staff in addressing wildlife concerns within the City. The proposed Pasadena Urban Wildlife Management Plan (Plan) describes the following three-pronged strategy for managing wildlife within City boundaries: 1) public education designed around co-existence with wildlife; 2) enforcement of laws and regulations prohibiting the feeding of wildlife; and 3) ensuring public safety by implementing appropriate, tiered responses to coyotes and human interactions. The first two components of the Plan (i.e., education and law enforcement) address black bears, cougars (i.e., mountain lions), coyotes, and other mammals (e.g., opossums, racoons, skunks, bobcats, and bats) frequently found around the City. Through the education component of the plan, the City would provide members of the community with information about decreasing attractants around properties, increasing pet safety, creating reasonable expectations of appropriate wildlife behavior, and reshaping wildlife behavior (i.e., hazing). Through the enforcement component of the Plan, the City would provide the public with information about current State and local laws that address problem wildlife, as well as which entity would be enforcing these laws in the City. The third component of the Plan would provide a transparent, tiered response describing how the City would respond to different scenarios of human and coyote interactions. The City's responses would range from providing information to residents about hazing to trapping and removing aggressive or habituated coyotes.

