

**ATTACHMENT F**  
**ADDENDUM TO GENERAL PLAN EIR**

***City of Pasadena  
2021-2029 Housing Element Update***

**Addendum  
to the  
Pasadena General Plan  
Environmental Impact Report**

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# Acronyms and Abbreviations

AB	Assembly Bill
BMP	Best Management Practice
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFS	Cubic Feet Per Second
City	City of Pasadena
CMP	Congestion Management Program
DSOD	Division of Safety of Dams
EIR	Environmental Impact Report
FAR	floor area ratio
FTA	Federal Transit Administration
GHG	greenhouse gas
GP EIR	2015 Pasadena General Plan Environmental Impact Report
HRA	health risk assessment
I-210	Interstate 210
IS	Initial Study
LEED	Leadership in Energy and Environmental Design
LTS	Less than Significant Impact
LTS-M	Less than Significant Impact with Mitigation
MERV	Maximum efficiency rating value
MMRP	Mitigation Monitoring and Reporting Program
NI	No Impact
O <sub>3</sub>	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OSHA	Occupational Safety and Health Administration
PFD	Pasadena Fire Department
PM <sub>2.5</sub>	fine particulate matter 2.5 microns or less in diameter
PM <sub>10</sub>	respirable particulate matter ten microns or less in diameter
PUSD	Pasadena Unified School District
PWP	Pasadena Department of Water and Power
RCRA	Resource Conservation and Recovery Act
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SOC	Statement of Overriding Considerations
S-U	significant and unavoidable impact
T-BACTs	best available control technologies for toxics
TACs	toxic air contaminants
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
VT	vehicles traveled

## **CHAPTER 1**

### **PURPOSE AND BACKGROUND**

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The City of Pasadena (City) has prepared this Addendum to the 2015 Pasadena General Plan Environmental Impact Report (GP EIR) (State Clearinghouse No. 2013091009) to address the potential environmental impacts associated with the 2021-2029 Housing Element Update (Housing Element Update, project, or proposed project). This Addendum is prepared in accordance with the California Environmental Quality Act of 1970 (CEQA) (Cal. Public Resources Code Section 21000, *et. seq.*, as amended) and its implementing guidelines (Cal. Code Regs., Title 14, Section 15000 *et. seq.*, 2016). This Addendum has been prepared and will be processed consistent with CEQA Guidelines (Cal. Code Regs., Title 14, Section 15162 and Section 15164).

In 2015, the City updated the Pasadena General Plan and prepared the GP EIR to analyze potential citywide impacts, broad policy alternatives, and programmatic mitigation measures associated with the update of the Pasadena General Plan and specific plan amendments. The changes focused on the Land Use and Mobility Elements and the Land Use Diagram. The update also included the consolidation of optional elements into required elements of the General Plan. The Land Use and Mobility Elements, together with the other General Plan elements, guide the overall physical development of the City through horizon year 2035. The GP EIR is a Program EIR as defined by CEQA Guidelines Section 15161, California Code of Regulations, Title 14, Division 6, Chapter 3 and prepared in compliance with CEQA Guidelines Section 15168. The Final GP EIR was certified and the findings, Statement of Overriding Considerations (SOC), and Mitigation Monitoring and Reporting Program (MMRP) adopted by the City Council on August 17, 2015 (Resolution No. 9451).

Per the GP EIR, future discretionary review may rely on analysis provided in the GP EIR for the purpose of tiering and/or streamlining. The purpose of tiering is to use the analysis of general matters contained in a broader EIR (such as the GP EIR) with later CEQA documents on narrower or more site specific projects (CEQA Guidelines Section 15152). Tiering serves to reduce repetitive analysis and provide subsequent site specific analysis at a time when it is meaningful. Tiering is common and appropriate when the sequence of analysis is from a General Plan EIR to a program of lesser scope, such as a Housing Element Update. Therefore, CEQA review required for the Housing Element Update may tier from the GP EIR pursuant to CEQA Guidelines Section 15152.

#### **1.1 APPLICABILITY AND USE OF AN ADDENDUM**

Per the GP EIR, CEQA review required for subsequent projects, including this update to the City's Housing Element, may tier from the GP EIR pursuant to CEQA Guidelines Section 15152. In addition, per CEQA Guidelines Section 15152(h), other methods to streamline the environmental review process also exist. These methods include the use of a Program EIR (i.e., GP EIR) for later activities (CEQA Guidelines Section 15168) and preparing an addendum (CEQA Guidelines Section 15164). Lead agencies have discretion regarding which method may apply and should be used.

Under the process described in CEQA Guidelines Section 15168(c), later activities in the program must be examined in the light of the Program EIR to determine whether an additional environmental document must be prepared. No additional documentation is required for

subsequent proposed actions (e.g., updating of the City's Housing Element) if the examination determines that the potential impacts were within the scope of the GP EIR, and subsequent proposed actions implement appropriate feasible mitigation measures identified in the MMRP that accompanies the Final EIR. Whether a later activity is within the scope of a Program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that a legal agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts and covered infrastructure as described in the Program EIR. If the agency finds that pursuant to CEQA Guidelines Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required.

The conditions in CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR are:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
  - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternative; or
  - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Pursuant to CEQA Guidelines Section 15164, the City, as the lead agency, has prepared this Addendum to confirm that none of the conditions identified in CEQA Guidelines Section 15162 and Public Resources Code Section 21166 have occurred. For a proposed project or implementing activity, CEQA Guidelines Section 15164 provides that an Addendum to a



previously certified Final EIR may be prepared if only minor technical changes or additions are necessary, or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred. The City must consider the whole of the data presented in the GP EIR with the information provided in this Addendum and the previously adopted MMRP.

## **1.2 FORMAT OF THIS ADDENDUM**

The previously certified GP EIR serves as the primary environmental compliance document for the project, and this Addendum provides minor changes and additions to the GP EIR. This Addendum should be considered with the full text of the previously certified GP EIR. All applicable mitigation measures from the GP EIR would be applicable to the proposed project and, therefore, are incorporated by reference into this Addendum. This Addendum relies on the use of an Environmental Checklist Form (Checklist), as suggested in Section 15063(d)(3) of the CEQA Guidelines. Per the CEQA Guidelines, an addendum does not need to be circulated for public review but can be included in or attached to the Final EIR prior to making a decision on the project.

## **1.3 SUMMARY OF FINDINGS**

Based upon the Checklist prepared for the proposed project and supporting responses (see Chapter 3), adoption of the Housing Element Update would not result in substantial changes requiring major revisions to the previously certified GP EIR. Further, the proposed project would not result in any new significant environmental impacts that were not discussed in the GP EIR or a substantial increase in the severity of previously identified significant impacts. No new mitigation measures are required for the proposed project. Since only minor changes and additions are required to the GP EIR, and none of the conditions described in Public Resources Code Section 21166 or CEQA Guidelines Section 15162(a-b) or Section 15163 requiring preparation of a subsequent or supplemental EIR have occurred, the City finds that the preparation of an Addendum to the GP EIR is the appropriate CEQA documentation for the proposed project and that the proposed project is within the scope of the GP EIR.

## **1.4 LEAD AGENCY AND DISCRETIONARY APPROVALS**

This Addendum and the previously certified GP EIR are intended to serve as the environmental documentation for the changes being proposed as part of the Housing Element Update. The City of Pasadena is the lead agency under CEQA and maintains authority to approve the Addendum for the adoption of the Housing Element Update. Discretionary approvals being sought as part of the Housing Element Update include the following:

- Acknowledge this Addendum to the GP EIR and that no subsequent CEQA document is required.
- Adopt the Housing Element Update.

## CHAPTER 2

### PROJECT DESCRIPTION

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#### 2.1 INTRODUCTION

On August 18, 2015, the City certified the Pasadena General Plan (GP) Final Environmental Impact Report (GP EIR). The GP EIR analyzed potential citywide impacts, broad policy alternatives, and programmatic mitigation measures. The GP EIR analyzed the update of the GP and specific plan amendments, which were limited to specific plan boundary changes and updated development caps within each of the City's eight specific plan areas. The changes focused on the Land Use and Mobility Elements and the Land Use Diagram. The update also included the consolidation of optional elements into required elements of the General Plan. The Land Use and Mobility Elements, together with the other General Plan elements, guide the overall physical development of the City through horizon year 2035.

The Housing Element is a mandated chapter of the Pasadena General Plan and addresses the production, maintenance, and improvement of housing, as well as ensuring equal access to housing for all persons. The Housing Element Update does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects will occur. The Housing Element Update is a policy document setting forth the City's plan to accommodate its share of regional housing needs, as determined by the Southern California Association of Governments (SCAG). This housing element covers an eight-year planning period from 2021 to 2029.

The detailed statutory requirements for preparing a housing element are contained in the California Government Code (Sections 65580–65589.8). In accordance with State law, the housing element must include: 1) an identification and analysis of its existing and projected housing needs; 2) an analysis of the various governmental and nongovernmental constraints to meeting that need; and 3) a series of goals, policies, and scheduled programs to further the development, improvement, and preservation of housing.

This housing element consists of two sections: Housing Framework and Appendices. The Housing Framework sets forth the housing concerns and issues in Pasadena, followed by the goals, policies, programs, and resources to address those issues. The Appendices support the Housing Framework and address specific statutory requirements as follows:

- Appendix A: Housing Needs. This includes an analysis of demographic, economic, social, and housing characteristics of Pasadena residents and an assessment of current and future housing needs in the community associated with population and employment growth and change.
- Appendix B: Constraints Analysis. This includes an analysis of potential governmental constraints that affect the development, maintenance, and improvement of housing for all income groups and people with disabilities, commensurate with the City's identified housing needs.
- Appendix C: Housing Resources. This includes an inventory of resources available to address the City's housing needs, including available land to accommodate new

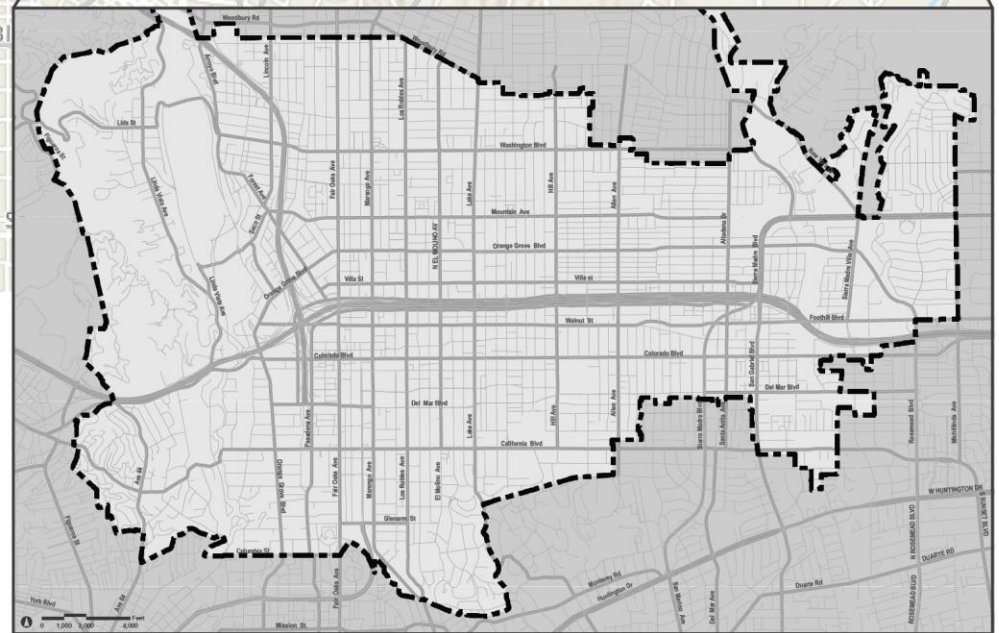
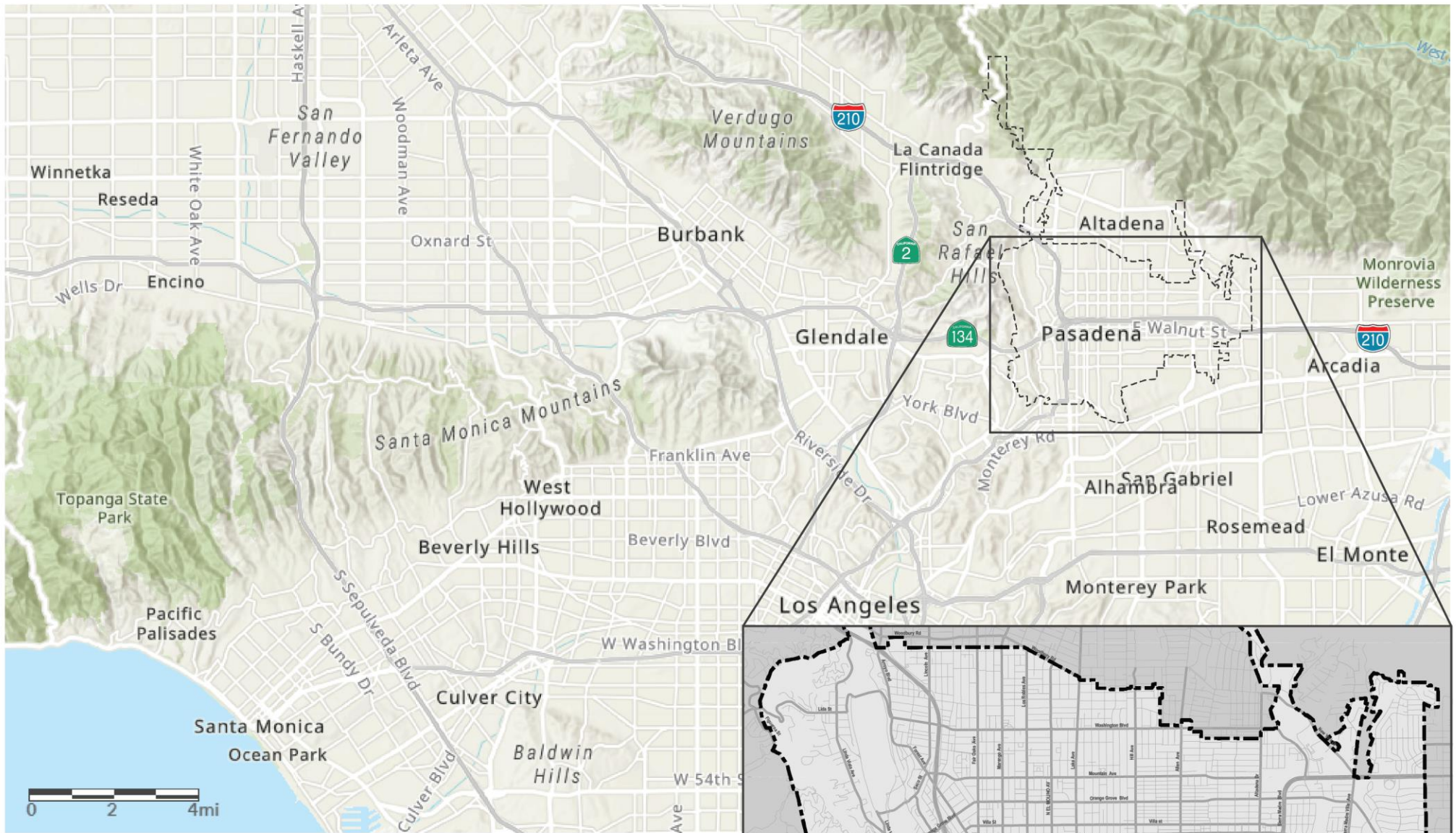
housing, financial resources to support program efforts, and administrative capacity to manage housing programs.

- Appendix D: Program Evaluation. This includes an evaluation of current housing programs and accomplishments in addressing the housing needs identified in the 2014–2021 Housing Element.
- Appendix E: Community Inputs. This includes the input from community engagement initiatives conducted for this Housing Element Update. Although the City lacks resources to implement all initiatives in the Housing Element Update, this appendix is a resource to draw upon for creative housing solutions over a longer planning horizon.
- Appendix F: Affirmatively Furthering Fair Housing. State Housing Element law requires a thorough analysis of any patterns of discrimination in the provision of housing. The analysis in this section is coupled with programs in the Housing Plan to forward meaningful actions to address fair housing issues identified in the analysis.

The purpose of this Addendum to the GP EIR is to evaluate the environmental effects associated with the Housing Element Update and to determine whether these impacts are consistent with the evaluation presented in the GP EIR in compliance with CEQA (Public Resources Code Sections 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.).

## **2.2 PROJECT LOCATION**

The City of Pasadena is located in north-central Los Angeles County, at the base of the San Gabriel Mountains. Interstate 210 bisects the City east to west, and State Route 110 has its northern terminus at the City's southern boundary (Figure 1 shows the regional location and City boundary and Figure 2 shows the Housing Element Sites Inventory). The Housing Element Update applies to all properties within the City limits.

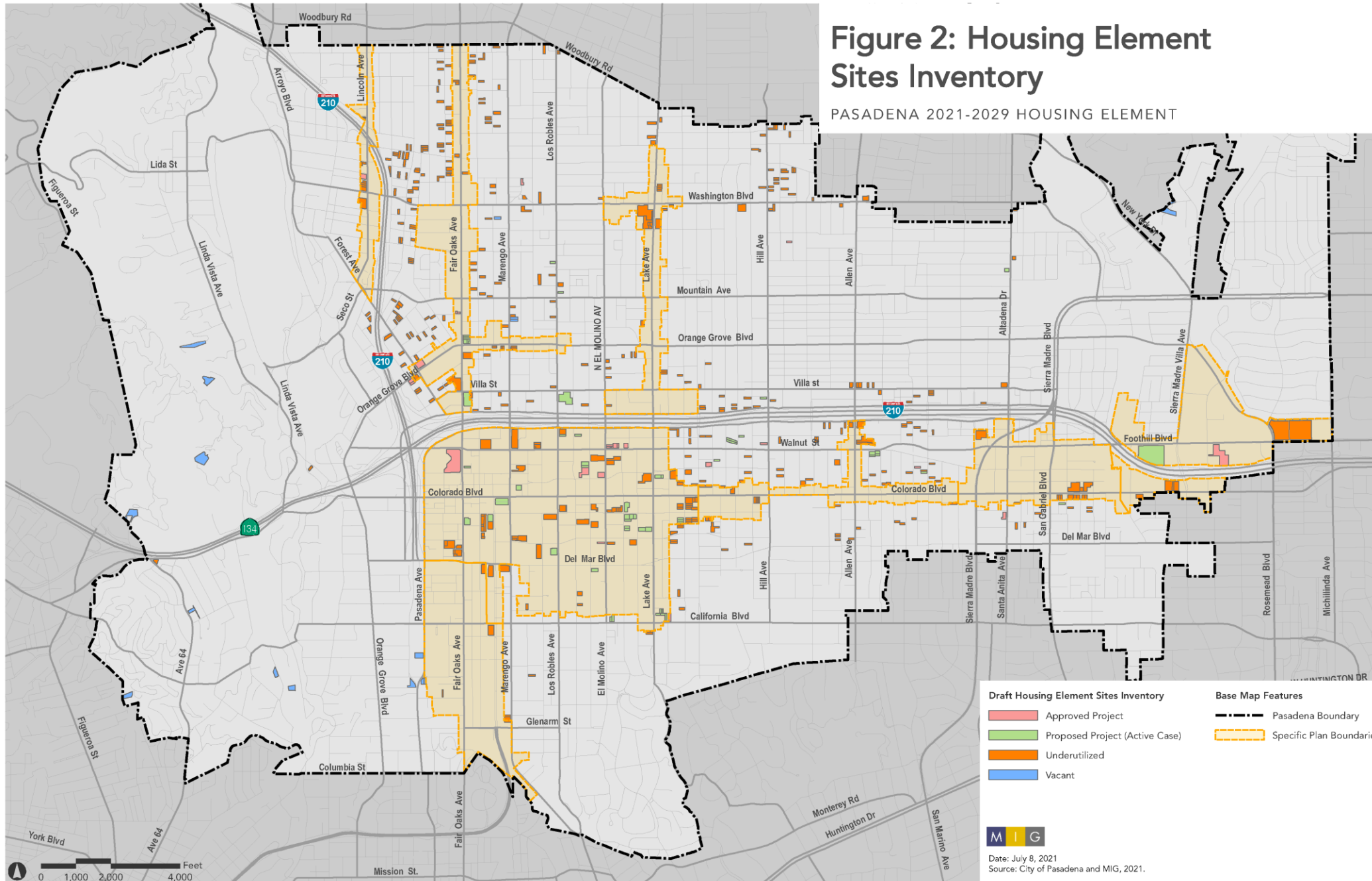


**Figure 1: City of Pasadena  
Regional Location Map**  
PASADENA 2021-2029 HOUSING ELEMENT



## Figure 2: Housing Element Sites Inventory

PASADENA 2021-2029 HOUSING ELEMENT



### Draft Housing Element Sites Inventory

- Approved Project
- Proposed Project (Active Case)
- Underutilized
- Vacant

### Base Map Features

- Pasadena Boundary
- Specific Plan Boundary



Date: July 8, 2021  
Source: City of Pasadena and MIG, 2021.

## 2.3 PROJECT OBJECTIVES

The objectives identified in the GP EIR include:

- **Objective 1:** Provide a new Land Use Element that targets growth to serve community needs and enhance the quality of life. Direct higher density development away from residential neighborhoods and into the Central District, Transit Villages, and Neighborhood Villages.
- **Objective 2:** Reduce vehicle miles traveled for the City and the region by providing a diverse housing stock, job opportunities, and exciting districts with commercial and recreational uses, and transit opportunities in the Central District, Transit Villages, and Neighborhood Villages.
- **Objective 3:** Ensure new development builds upon Pasadena's tradition of strong sense of place, great neighborhoods, gardens, plazas, parks, and trees.
- **Objective 4:** Preserve Pasadena's historic resources by ensuring that new development is compatible with and differentiated from existing historic resources.
- **Objective 5:** Achieve economic vitality and fiscal responsibility by providing jobs, services, revenues, and opportunities with a diverse economic base.
- **Objective 6:** Provide a General Plan that establishes the goals and policies to create a socially, economically, and environmentally sustainable community. Provide safe, well-designed, accessible, and human-scale residential and commercial areas where people of all ages can live, work, and play, including neighborhood parks, urban open spaces, and the equitable distribution of public and private recreational facilities.
- **Objective 7:** Create a cultural, scientific, corporate, entertainment, and educational center for the region. Provide long-term growth opportunities for existing institutions and foster a healthy economy to attract new cultural, scientific, corporate, entertainment, and educational institutions.
- **Objective 8:** Create mobility guidelines and multimodal metrics consistent with Senate Bill (SB) 743. Incorporate new goals, policies, and programs that balance multiple modes of transportation and meet the requirements of the Complete Streets Act.
- **Objective 9:** Reduce greenhouse gas emissions and encourage walking, biking, transit, and other alternatives to motor vehicles by creating strategies to encourage nonautomotive travel and protect residential neighborhoods consistent with Assembly Bill (AB) 32, SB 375, and SB 743.
- **Objective 10:** Reconcile General Plan buildout projections with regional and subregional estimates for growth creating consistency with the Southern California Association of Governments (SCAG).
- **Objective 11:** Incorporate housing sites identified in the adopted Housing Element with the Land Use Element.

Table 1 show the goals and policies included in the Housing Element Update:

<b>Table 1: Housing Element Update Goals and Policies</b>	
<b>Goal HE-1</b>	<b>Neighborhoods citywide with quality housing, parks and community services, infrastructure, and public services that maintain and enhance neighborhood quality, character, and residents' health.</b>
Policy HE-1.1	<b>Diversity of Neighborhoods.</b> Provide balanced mixes, densities, and forms of residential and mixed-use districts and neighborhoods.
Policy HE-1.2	<b>Property Conditions.</b> Help property owners maintain the quality of rental and ownership housing by ensuring compliance with City building codes and standards. Facilitate and promote the renovation, improvement, and rehabilitation of housing.
Policy HE-1.3	<b>Housing Design.</b> Require excellence in design of housing through use of materials and colors, building treatments, landscaping, open space, parking, and environmentally sensitive and sustainable building design.
Policy HE-1.4	<b>Historic Preservation.</b> Promote the preservation of historically and architecturally significant buildings and the quality of historic neighborhoods through the appropriate land use, design, and housing policies and practices
Policy HE-1.5	<b>Community Services.</b> Integrate and maintain the provision of schools, public safety, community centers, infrastructure, green spaces and parks, and other public amenities with the planning and development of housing.
Policy HE-1.6	<b>Green Spaces.</b> Preserve neighborhood and community parks, street trees, open spaces and recreational areas, hillsides, and other landscape amenities that support, define, and lend character to residential neighborhoods. For new development, ensure that residents have ready access to public parks and private open space.
Policy HE-1.7	<b>Neighborhood Safety.</b> Provide City services that contribute to the overall safety of neighborhoods in terms of traffic and circulation, crime prevention, and property conditions. Support the efforts of neighborhood groups to promote safe conditions in their neighborhoods.
Policy HE-1.8	<b>Healthful Housing.</b> Promote indoor air quality through a ban on smoking in apartments and condominiums and with construction materials that are sustainable, green, and not a detriment to indoor air quality.
<b>Goal HE-2</b>	<b>A balanced supply and diversity of rental and ownership housing suited to residents of varying lifestyle needs and income levels.</b>
Policy HE-2.1	<b>Housing Diversity.</b> Facilitate and encourage diversity in types, prices, ownership, and size of single-unit homes, apartments, homes, mixed-use and transit-oriented developments, work/live housing, and emerging housing types.
Policy HE-2.2	<b>Strategic Growth.</b> Direct new residential development into the Central District, transit villages, neighborhood villages, and along key corridors—neighborhoods where people can live and work, shop, and benefit from access to a rail and bus transit.
Policy HE-2.3	<b>Environmental Sustainability.</b> Encourage sustainable patterns of residential growth and preservation with respect to land use, building and site design, resource conservation, open space, and health considerations.
Policy HE-2.4	<b>Affordable Housing.</b> Facilitate a mix of household income and affordability levels in residential projects citywide, with an emphasis on ensuring integration of affordable housing into every neighborhood.
Policy HE-2.5	<b>Adaptive Reuse.</b> Support innovative strategies for the adaptive reuse of office, retail, hotels/motels, and industrial buildings, consistent with land use policy, to accommodate innovative housing types and productive use of underused buildings.
Policy HE-2.6	<b>Housing Incentives.</b> Facilitate the development of affordable housing through regulatory concessions, financial assistance, density bonuses, the inclusionary housing program, and other City and outside agency programs.

Policy HE-2.7	<b>Missing Middle.</b> Address the growing need for “missing middle” housing—rental and ownership homes affordable to the moderate-income workforce.
Policy HE-2.8	<b>Development Process.</b> Modify development processes to streamline and simplify the processing of entitlement permits, design review, building permits, and funding of affordable housing.
Policy HE-2.9	<b>Community Involvement.</b> Continue and support dialogue with builders, advocates, nonprofits, residents, finance industry, and other stakeholders to understand and address evolving housing needs of residents and the workforce.
Policy HE-2.10	<b>Overconcentration of Affordable Housing.</b> Ensure future development of housing distributes affordable units throughout the City and avoids overconcentration of affordable units.
<b>Goal HE-3</b>	<b>Increased opportunities for people to find and retain housing in Pasadena and to afford rental and ownership homes specific to their income and life stage status.</b>
Policy HE-3.1	<b>Financial Resources.</b> Pursue and maximize the use of State, federal, local, and private funds for the development, preservation, and rehabilitation of housing affordable to lower- and moderate-income households.
Policy HE-3.2	<b>Partnerships.</b> Pursue collaborative partnerships with nonprofit organizations, faith-based organizations, developers, business community, and State and federal agencies to develop, rehabilitate, preserve, and retain affordable housing.
Policy HE-3.3	<b>Homeownership Opportunities.</b> Increase homeownership opportunities for lower- and moderate-income residents, local employees, and essential workers through the provision of financial assistance (subject to funding availability and partnerships).
Policy HE-3.4	<b>Preservation of Affordable Housing.</b> Establish and seek to renew long-term affordability covenants for all City-assisted housing projects. Support the conservation of unassisted housing affordable to lower-income households.
Policy HE-3.5	<b>Homeownership Retention.</b> Create and maintain education and resources that enable residents to make informed decisions on home purchases and maintaining homeownership.
Policy HE-3.6	<b>Rental Assistance.</b> Support the provision of rental assistance for residents earning lower incomes, including persons with special needs consistent with City preference and priority categories and fair housing law.
Policy HE-3.7	<b>Workforce Housing.</b> Work with major employers, educational institutions, health care institutions, and other employers within Pasadena to facilitate and encourage the development of workforce housing opportunities.
Policy HE-3.8	<b>Housing Acquisition and Rehabilitation.</b> Promote the acquisition, rehabilitation, preservation, or purchase of affordability covenants on multi-family housing and the maximum extension of affordability controls.
Policy HE-3.9	<b>Neighborhood Stability.</b> Promote strategies that guard against neighborhood gentrification and facilitate the ability of long-time residents to remain in their neighborhoods as economic conditions change.
<b>Goal HE-4</b>	<b>Adequate housing opportunities and support services for seniors, people with disabilities, families with children, college students, and people in need of emergency, transitional, or supportive housing.</b>
Policy HE-4.1	<b>Senior Housing.</b> Support development and maintenance of affordable senior rental and ownership housing and supportive services that facilitate independence and the ability of seniors to remain in their homes and the community.
Policy HE-4.2	<b>Family Housing.</b> Facilitate and encourage the development of larger housing units for families with children, and the provision of support services such as childcare, after-school care, family development services, and health care.
Policy HE-4.3	<b>People with Disabilities.</b> Support the development of permanent, affordable, and accessible housing that allows people with disabilities to live independent lives.



Policy HE-4.4	<b>Service-Enriched Housing.</b> Support and assist organizations in the provision of support services and service-enriched housing for special needs groups, such as seniors, large families, people with disabilities, people experiencing homelessness, and those with medical conditions.
Policy HE-4.5	<b>Large Institutions.</b> Work with educational and health care institutions to update master plans and provide housing accommodations for students, faculty, and employees that reflect the housing needs and preferences of their respective institution.
Policy HE-4.6	<b>Homeless Housing and Services.</b> Provide support and financial assistance to community service organizations that provide housing opportunities and supportive services for people who are homeless or at risk of being homeless.
<b>Goal HE-5</b>	<b>A housing environment in which all people have equal access to the housing of their choice and are treated with dignity and respect in the neighborhoods in which they choose to live.</b>
Policy HE-5.1	<b>Fair Housing.</b> Support the enforcement of federal and State fair housing laws that prohibit discrimination in the sale, rental, and occupancy of housing on the bases of race, religion, color, ancestry, national origin, age, sex, sexual orientation, family type, handicap, minor children, or other protected status under State and federal law.
Policy HE-5.2	<b>Organizational Support.</b> Support organizations that can receive and investigate allegations of noncompliance with fair housing principles, monitor compliance with fair housing laws, and refer possible violations to enforcing agencies.
Policy HE-5.3	<b>Distributed Housing.</b> Work to ensure that housing for lower-income households is distributed throughout the City and that concentrations in particular neighborhoods and/or Council districts are explicitly avoided.
Policy HE-5.4	<b>Supportive Housing.</b> Promote a balanced geographical dispersal of assisted affordable housing developments and associated supportive social services for individuals and households throughout the community.
Policy HE-5.5	<b>Civic Engagement.</b> Provide the means for residents and neighborhood organizations to be proactive in identifying and addressing housing and neighborhood needs and seeking solutions in partnership with the City. Facilitate increased participation among traditionally underrepresented groups in the public decision-making process.

## 2.4 DESCRIPTION OF THE PROPOSED PROJECT

A Housing Element is one of the eight required General Plan elements. It addresses existing and future housing needs of persons of all income levels and provides policy guidance to decision-makers and City staff. The City is not required to construct housing to meet those needs, but it must create a regulatory environment that supports and encourages housing production and equal access to housing. The Housing Element Update does not specifically authorize the construction of any housing development, nor does it indicate where and when specific housing projects will occur. The Housing Element Update is a policy document setting forth the City's plan to accommodate its share of regional housing needs, as determined by the Southern California Association of Governments (SCAG). This Housing Element Update covers an eight-year planning period from 2021 to 2029.

State law requires that all housing elements address five key topics: 1) housing needs, 2) constraints to housing development, 3) housing resources, 4) affirmatively furthering fair housing, and 5) a housing plan. Article 10.6, Section 65580 – 65589.8, Chapter 3 of Division 1 of Title 7 of the California Government Code establishes the legal requirements for a housing element and encourages the provision of affordable and decent housing, in suitable living environments, in all communities, in working toward statewide goals. The 2021-2029 Housing

Element Update is the policy document that addresses current and projected housing needs consistent with State law.

### **Implementation Action Programs**

In addition to goals and policies (listed above), the Housing Element Update includes 24 implementation action programs to implement policy direction.

**PROGRAM #1: CODE ENFORCEMENT AND HOUSING INSPECTION.** Code enforcement and other efforts to improve the quality of housing are important tools to maintain home values and to protect residents' health, safety, and welfare. To achieve these goals, the City conducts several code enforcement and housing inspection programs.

- **Code Compliance.** Code compliance is a means to ensure that the quality of the City's commercial and residential neighborhoods is maintained. Code compliance staff enforces State and local regulations governing exterior building conditions, property maintenance, and interior conditions. Code compliance staff also works with neighborhood groups to address common concerns. For properties found in violation, eligible property owners are directed to nonprofit organizations and City rehabilitation loans and grants for assistance in resolving code violations and making repairs. The City has organized the Code Compliance Division to have officers assigned to specific areas of Pasadena, thus achieving faster abatement.
- **Emergency Enforcement.** The City maintains an inter- departmental effort called City Resources Against Substandard Housing (CRASH), chaired by the Code Compliance Manager. The CRASH team includes representatives from Health, Fire, Building, Humane Society, Police, and Code Enforcement. The CRASH team works to correct substandard buildings, eliminate blight, identify solutions to neighborhood crime, and provide emergency response and abatement for the worst properties. The program also encompasses an education component to train property owners in prevention of illegal activity. In addition, Health and Code Compliance staff regularly reassign complaints via the Pasadena Citizen Service Center for appropriate follow-up.
- **Maintenance Assistance to Homeowners.** The MASH program provides free services to low income, senior, or disabled homeowners unable to perform deferred maintenance on their owner-occupied, single-family homes. As a secondary function, the MASH program provides a unique program for providing on-the-job training for adults to gain the skills and work habits necessary to obtain a permanent job. MASH crews may also assist in times of emergencies, such as fire, storms, or earthquakes.
- **Occupancy Inspection.** This inspection is designed to ensure the quality and maintenance of single-family homes, duplexes, and condominiums. Whenever a change in occupancy of an eligible unit occurs, the property is inspected for compliance with City codes. Typical items inspected include electrical, plumbing, heating, structural conditions, and health and safety items. If a housing code violation is found, the property owner is notified of the violations and given a reasonable time to correct them. Upon correction of the violations, a certificate of inspection is issued. To streamline the program, the City has established an online self-certification process at: <https://www.cityofpasadena.net/planning/code-compliance/presale-program/>

- **Quadrennial Inspection.** This inspection is designed to ensure that apartments are decent, safe, and well maintained. All rental properties with three or more units are inspected at least once every four years. Typical items inspected include the same as an occupancy inspection. Property owners are notified if code violations exist and, upon remedy, are issued a certificate of compliance. This program continues to be an effective way to identify code violations as they occur, before they affect the condition of the building and quality of life experienced by tenants.
- **Lead-Based Paint Hazards.** The City's Public Health Department has a Childhood Lead Poisoning Prevention Program designed to prevent lead exposure and, when exposure occurs, to care for children with lead poisoning. Public health nurses provide case management for children and their families affected by lead poisoning. Environmental health specialists work with nurses to identify lead sources, provide advice on lead-safe painting and remodeling, enforce City ordinances for lead reduction, and provide information and assistance to care providers of children.

**PROGRAM #2: NORTHWEST PASADENA.** The City of Pasadena has long directed enhanced efforts at improving conditions in Northwest Pasadena, where a history of discriminatory real estate practices, followed by decades of underinvestment, created neighborhoods in need of focused attention. Through community building efforts and enhanced community participation, the City continues to make substantial investments in this area. Prior to the dissolution of redevelopment in California, funds were available for significant investment in housing. Without that resource, the City has had to use federal and State funding sources more creatively to improve the existing housing stock and bring new homes to the Northwest community. It should be noted that the CDBG Northwest Fund account was discontinued in 2015 due to overall reduction citywide on CDBG resources.

- **Community Building.** Pasadena supports for-profit, nonprofit, and faith-based organizations that are committed to implementing community-building efforts in Northwest Pasadena. These include, but are not limited to, Flintridge Center, Community Bible Church through its work at the Kings Village and Community Arms Apartment projects, and numerous other nonprofit and for-profit organizations. Other efforts include Neighbors Acting Together Helping All (NATHA), which has received three-year grants from the California Community Foundation.
- **Northwest Commission and Programs.** Working in conjunction with the Northwest Commission, the City's Northwest Program office works specifically to maintain a healthy business environment and facilitate housing maintenance and production. These include monitoring of capital improvement projects, improvements to park facilities and community centers, police department activities to address neighborhood safety, and ongoing liaison activities with neighborhoods associations.
- **Citywide Programs.** The many programs described in this element are used to assist households within Northwest Pasadena, from rental assistance to tenant protections to new affordable housing construction. The City will conduct focused outreach for these programs in Northwest Pasadena to increase residents' awareness of available resources.

**PROGRAM #3: HOUSING REHABILITATION.** Many housing units in Pasadena are 50 years or older; maintaining housing in good condition is a critical priority since existing units are often the most affordable type of housing. In addition to the programs described in Program

#1, the City offers several programs to encourage the maintenance, repair, and improvement of rental and ownership housing.

- **Municipal Assistance, Solutions, and Hiring (MASH).** The MASH program provides free services to low-income, senior, or disabled homeowners unable to perform deferred maintenance on their owner-occupied, single-family homes. As a secondary function, the MASH program provides a unique program for providing on-the-job training for adults to gain the skills and work habits necessary to obtain a permanent job. MASH crews may also assist in times of emergencies, such as fire, storms, or earthquakes.
- **Single-family Rehabilitation Loan.** The City works with Neighborhood Housing Services of Los Angeles County (NHS) to provide services. This program includes a single-family rehabilitation loan program, homebuyer and homeownership education, foreclosure counseling, and other neighborhood services formerly provided by the Pasadena NHS. These programs are offered citywide, although many of the activities are targeted for residents in the Northwest community. Three owner-occupied home rehabilitation projects were completed by the interdepartmental Under One Roof program between 2014 and 2020: 840 Manzanita Avenue, 3570 Cartwright Avenue, and 760 Elmira Street. NHS administers the HOME single-family rehabilitation program in Pasadena. The program is being marketed to identify projects.
- **Acquisition/Rehabilitation.** Pasadena implements multi-family and other housing acquisition and rehabilitation efforts as opportunities arise. However, initiation of a more strategic, proactive program can help fill a needed gap, serve to both upgrade older apartment properties and stabilize rents, and enhance City efforts to improve distressed neighborhoods. One project, 268 Waverly Drive, involved City purchase and rehabilitation of a Caltrans-owned single-family residence and construction of an ADU for City operation of rental Rapid Re-Housing.

Lack of a permanent source of funds limit the City's ability to compete with market rate investors to acquire residential buildings. However, the City used HOME funds to support a nonprofit housing developer's acquisition/rehabilitation and preservation of a 44-unit housing project (The Groves). Also, the City Council continues to consider committing inclusionary in-lieu fees to assist with acquisition/rehabilitation project

**PROGRAM #4: HISTORIC PRESERVATION.** The City's historic preservation program promotes the identification, evaluation, rehabilitation, adaptive use, and restoration of historic structures, neighborhoods, and other landmarks. With respect to housing, key activities directed at historic preservation objectives are as follows.

- **Historic Ordinance and Design Guidelines.** The Historic Preservation Ordinance implements the goals, policies, and programs of the General Plan and establishes the review authority of the Historic Preservation Commission and Design Commission. City codes require that properties within historic districts and individually designated historic properties be reviewed and approved prior to alteration or development. Pasadena's "Design Guidelines for Historic Districts" and the Secretary of the Interior's "Standards for Rehabilitation" help guide the review of historic properties. In March 2021, the City adopted changes to the Historic Preservation Ordinance. Details of the historic preservation programs, which promote the identification, evolution, rehabilitation, adaptive reuse, and restoration of historic structures, are advertised on

the City's website. Key revisions included in the 2021 update are: 1) the regulations now apply to all buildings 45 years of age or older and 2) for undesignated historic resources, a Certificate of Appropriateness is required for demolitions and major projects (as defined in the ordinance). The requirement to conduct an assessment to building 45 years of age or older can add up to 12 weeks to the entitlement process.

- **Historic Preservation Incentives.** The City offers incentives to promote the preservation of historic sites and structures. Incentives include reduction of building permit fees and construction tax, waiver of covered parking requirements in single-family landmark districts, modified City of Gardens standards, and variances for both adaptive reuse and relocation. The City's Mills Act program also allows owners of designated historic properties to reduce their property taxes in exchange for a contract with the City to maintain the property's historic character.

**PROGRAM #5: HOUSING DESIGN.** Pasadena implements design review of proposed projects to ensure that new development is of exemplary quality and appropriately integrated into the surrounding neighborhood context.

- **Design Review.** Pasadena requires excellence in architectural design that complements the scale and character of the City. Citywide design principles set the foundation, and City residential design guidelines provide clear examples of the quality and type of design recommended. Design guidelines work in tandem with development standards in the zoning code or appropriate specific plans.
- **Neighborhood Development Permit, Hillside Development Permit, and Single-Family Compatibility Permit.** The City has three types of permits that provide a means to ensure proposed new development fits within existing neighborhood context. The Neighborhood Development Permit is required for properties within the Lower Hastings Ranch neighborhood and is intended to preserve the scale and architectural style of this 1950s/1960s era neighborhood. The Hillside Development Permit is required for specific types of projects, including proposed subdivisions, new dwelling units or structures, any new square footage above the first story, and the addition of 500 square feet or greater to the first floor of an existing structure for properties that are within the HD and HD-SR overlay zones. The Single-Family Compatibility Permit applies only to properties within limited designated geographic areas for which applications for second building stories or upper-story additions; the regulations are intended to address concerns regarding "mansionization" in lower-scale single-family neighborhoods.
- **City of Gardens Standards.** The City of Gardens Standards apply to multi-family projects within RM districts, certain specific plan areas, and the CL and CO commercial districts. City of Gardens standards are an innovative set of zoning regulations aimed at creating more livable multi-family housing projects, encouraging designs that typify the garden character of earlier apartments and bungalow courts in Pasadena. These standards are also an integral way of encouraging the production of multi-family apartments and condominium projects of lasting quality.
- **Historic Review.** Because of the age, history, and rich fabric of Pasadena, many structures contain valuable and historic architectural features. The Pasadena Zoning code requires that properties within historic districts and individually designated historic properties must be reviewed and approved prior to alteration or development.

Pasadena's "Design Guidelines for Historic Districts" and the Secretary of the Interior's "Standards for Rehabilitation" help guide historic review. City staff carefully reviews such structures to ensure that historic features are preserved.

**PROGRAM #6: HOUSING SITES.** Since 1994, Pasadena's General Plan has explicitly directed new residential development into seven specific plan areas. The 2015 update of the Land Use Element confirmed this direction and more specifically, stated that growth would occur within the Central District, transit villages, and neighborhood villages and along selected corridors. This strategy is intended to allow for continued growth and development while reducing traffic congestion, improving air quality, providing housing, and stimulating economic development.

Beginning in 2017, the City initiated updates of the seven specific plans and creation of an eighth for Lamanda Park (comprising parts of the current East Colorado and East Pasadena Specific Plans). Adoption of all specific plans should conclude by the end of 2023. The 2015 General Plan established residential development caps within each specific plan area. However, affordable housing production is not included within the caps (except within the Fair Oaks/Orange Grove Specific Plan). Also, adoption of the Specific Plans will expand the overall residential capacity in Pasadena by increasing development densities in some areas and allowing residential uses on properties currently zoned exclusively for residential use. Notably, in this Housing Element the City commits to removing the development caps stated in the General Plan, and the Specific Plans will not identify caps.

The RHNA for 2021-2029 is 9,429 units divided among four household income categories. These housing planning targets can be addressed through a combination of housing production credits and available housing sites. As mentioned in Appendix C, adequate sites can be identified to accommodate the full RHNA at the four income levels. If, through the update process of the specific plans, additional housing capacity is created, this can be reflected in any subsequent Housing Element updates.

**PROGRAM #7: MIXED USE/TOD STRATEGY.** Pasadena housing growth strategy, as noted above, relies predominantly on mixed-use and transit-oriented development focused into specific plan areas, transit villages, and neighborhood villages, plus along key corridors. To implement the Land Use Element, the City has a mixed-use/transit-oriented development strategy described below.

- **Mixed-Use Development.** Mixed use is the key strategy to increase housing choices (including affordable housing), concentrate higher-density projects in specific plan areas, support economic activity, and improve neighborhood/district walkability. To achieve these benefits, the City has codified zoning standards that facilitate and encourage mixed-use projects—such as reducing the project area required for open space, providing flexibility in meeting that requirement, and allowing a larger building envelope.
- **Transit-Oriented Development.** Transit-oriented development, or TOD, closely coordinates land use and mobility planning, making it more convenient to travel throughout the community by transit and foot. Pasadena has embraced TOD planning since establishment of the Gold Line (now called the L Line) in the City in 2003. In 2005, Pasadena adopted TOD standards to encourage projects within a quarter-mile radius of light rail stations and throughout the greater Central District, which has three stations. Allowed densities are substantially higher within one-quarter mile of transit

stations. These incentives have resulted in numerous residential and mixed-use projects, including Westgate, Del Mar Station, 10 West Walnut, and numerous projects in East Pasadena near the Sierra Madre station.

**PROGRAM #8: INCLUSIONARY HOUSING.** The City's Inclusionary Housing Ordinance requires that residential and mixed-use projects of 10 or more units dedicate 20 percent of the units as affordable to very low-, low-, and moderate-income households. For rental housing, at least five percent must be rented to very low-income households, five percent to very low- or low-income, and 10 percent to very low-, low-, or moderate-income. As an alternative to constructing the inclusionary units, a developer may choose one of three options: 1) pay an in-lieu fee, 2) construct the required units on another site, or 3) donate another site for a portion or total number of units. If existing affordable units are displaced by a development project, the required inclusionary units must be provided on that site.

The City's inclusionary housing ordinance continues to be very effective, benefitting immensely from AB 1505, which eliminated restrictions on the application of inclusionary housing ordinances. From 2014 to 2020, 432 inclusionary affordable units were added (building permits issued, under construction, and completed), and \$14,283,090 in developer-paid in-lieu fees were added to the Inclusionary Housing Trust Fund. During 2020 alone, despite the COVID-19 pandemic, 135 inclusionary units had building permits issued, were under construction, or were issued occupancy permits.

The City updated the ordinance in 2019 to increase the inclusionary requirement from 15 to 20 percent, increase in-lieu fees, and provide a streamlined process for developers utilize concessions and incentives pursuant to State density bonus law through a local Affordable Housing Concession Menu.

**PROGRAM #9: REMOVAL OF CONSTRAINTS.** The Constraints chapter of this Housing Element identifies several conditions and practices that act to constrain housing development. By addressing these conditions and practices, the City can streamline development processes, thus allowing developers to get housing to market faster and less expensively.

- **Development Review.** City staff continues to examine how modifications to development review procedures and requirements— design review, permit processing, commission reviews, and other features— can be improved to streamline the process. In 2020, Pasadena implemented a new Land Management System to consolidate and streamline several processes, including use of an online plan check tool. In the future, further improvements may include broader by-right approval processes, streamlined environmental review, and tighter timeframes to comply with SB 330 (statutes of 2019). The City assesses the improvements in light of staffing loads, community expectations, service demands, and funding.
- **Development Fees.** Development fees largely are established based on nexus studies and the cost of providing municipal services and infrastructure to serve new development. The California legislature has focused on fees as significant cost driving up housing prices and proposed laws to control fees. The City sets its fees to reflect cost recovery, will continue to review fees on a regular basis (every two to three years), and will impose fees consistent with community expectations for services and facilities and in compliance with all state laws.

- **Short-Term Rentals.** Pasadena is a destination and vacation city, not just during the annual Rose Parade and Rose Bowl festivities but year-round. Some property owners look to profit from this circumstance by renting out their units for short-term vacation stays, thus removing homes from the ordinary rental market and potentially driving up prices to purchase properties because of the income potential. While Pasadena has a short-term rental ordinance, regulations may be revisited if the City finds that short-term rental activities are adversely impacting housing supply.
- **Residential Care Facilities.** With the passage of several State laws addressing transitional and supportive housing, the distinction between such housing and group homes has become blurred. The Pasadena Zoning Code (Municipal Code Title 17) subsumes the definition of group homes within that of “residential care facilities,” with the specific distinction that a residential care facility involves 24-hour nonmedical care. Residential care facilities for seven or more persons require a conditional use permit in residential and commercial zones, whereas transitional and supportive housing do not. The regulations will be revisited as part of the comprehensive Zoning Code update to ensure the distinctions are clear and all regulations comply with current State law. This will include addressing the need for any conditional use permit requirement to focus on life safety conditions of such facilities and not the persons being housed.
- **Development Caps.** The City's General Plan identifies development caps that limit the number of residential units and non-residential square footage permitted to be built within each Specific Plan area. The General Plan also allows the conversion of non-residential square footage to residential units. The City will establish the specific requirements for conversion to ensure housing is allowed to be developed in Specific Plan areas. Also, the City is committed to removing the caps set forth in the General Plan and will not include caps in the updated Specific Plans.
- **Emergency Housing.** Meeting the needs of Pasadena’s unhoused residents includes ensuring that emergency housing is available commensurate with identified need. Zoning regulations need to clearly identify where emergency housing can be established, and the development regulations need to be crafted in manner that allows such facilities to be readily established. State law is very specific regarding zoning regulations for emergency housing, including requiring Low Barrier Navigation Centers to be a by-right use in mixed-use and nonresidential zones.
- **Ongoing Evaluation.** Over time, potential constraints to the development, maintenance, and improvement of housing will arise due to changing conditions and local needs. These potential constraints may be related to municipal codes, environmental conditions, funding availability, or City processes. The City will respond to changing conditions as they arise and evaluate whether further adjustments to local government practices are needed to provide a welcoming environment for housing production.

**PROGRAM #10: REGULATORY INCENTIVES.** Because Pasadena is built out with well-established development patterns, housing incentives represent the key means to facilitate the construction of affordable and market-rate housing in targeted growth areas.

- **Density Bonus.** Pasadena implements a density bonus ordinance to incentivize the production of affordable housing. Because the ordinance, as of June 2021, has not been updated to reflect evolving State density bonus law, the City defaults to the



requirements of State law where the local ordinance conflicts. Given the effectiveness and flexibility of the City's concession menu ordinance, many developers opt instead to use the concession programs in that ordinance over density bonus provisions. The City, in a May 2021 memorandum, outlined the relationship between density bonus law and the inclusionary housing ordinance to assist the development community.

- **Parking Incentives.** Reductions in parking requirements are available to facilitate affordable, special needs, and transit-oriented housing. For example, tandem parking may fulfill up to 30 percent of the parking requirement in multi-family and mixed-use projects. Parking may be reduced to 0.5 space per unit for senior housing and 0.25 space for single room occupancy units. The City also requires a reduction in parking for transit-oriented development within one-quarter mile of a light rail station and in the Central District Transit-Oriented Area. However, through the public engagement process for the Housing Element, the public noted additional constraints imposed by Pasadena's parking regulations.
- **Minor Variances.** The City has created other flexible tools to facilitate new housing, such as the minor variance process. Eligible projects can receive the following minor variances: 1) yard setback requirements, with no limit on percentage of deviation; 2) size of landscape areas in multi-family districts (including City of Gardens projects); 3) fence/wall height, with no limit on percentage of deviation; 4) building heights; and 5) other development standards set forth in the municipal code.

**PROGRAM #11: ALTERNATIVE HOUSING OPPORTUNITIES.** Pasadena residential neighborhoods offer a diversity of housing types that vary in type, density, and vintage. The challenge in creating new housing opportunities is how to integrate new units into established and highly defined neighborhoods.

- **Accessory Dwelling Units.** Beginning in 2017, the State legislature passed a series of laws regulating accessory dwelling units, or ADUs, recognizing the ability of such housing to provide an ample source of smaller units considered affordable by design. These laws now largely pre-empt local regulations, and homeowners have the authority to construct a detached ADU as well as a junior ADU (essentially a rented room with an efficiency kitchen) in a single-family residence. Under certain conditions, extra space in multi-family dwellings can be converted to units. Rent from second units can help modest income and elderly homeowners remain in or continue affording their homes. As of June 2020, the City had not adopted a local ADU ordinance and thus relies upon the provisions of State law. In 2019-2020, Pasadena received 150 applications for ADUs. In 2020, the City's Housing Department initiated a pilot program to provide loans to qualifying property owners wishing to construct a new ADU or to legalize an existing ADU constructed without proper permits. Also in 2021, the City launched a joint ADU Technical Services project with SCAG, which includes a review of current ADU approval processes and any recommended improvements; potential prototype plans, together with development of other materials to encourage ADU production in Pasadena.
- **Religious Facilities with Affordable Housing Ordinance.** Pasadena is home to a multitude of properties owned by churches, mosques, temples, and other religious institutions. In 2022, the City started the process of investigating whether to allow housing development to occur on these properties. Local institutions and housing advocacy organizations have expressed enthusiasm over such a program.

- **Caltrans Houses.** For decades, the California Department of Transportation (Caltrans) has owned the homes located along the planned route for the I-710 freeway extension. With the State Legislature's action not to pursue the extension, plans continue to move forward for reuse of the Caltrans properties. Many of the large homes could readily be converted to supportive housing, and the City has already completed a demonstration project by purchasing and rehabilitating a unit, plus adding an ADU, with all units provided for lower-income households.

**PROGRAM #12: FINANCIAL ASSISTANCE.** The City provides financial assistance for developers of affordable housing to encourage the production of affordable housing. Assistance may include direct financial contributions, land assemblage/write-downs, and fee modifications or waivers.

- **City Assistance.** During 2014-2020, the City provided funding to assist in the rehabilitation, preservation, or development of 225 affordable units. Funding resources include the Inclusionary Housing Trust Fund, HOME, State, and federal funds. Eligible uses include new construction (rental and ownership), property acquisition, rehabilitation (rental and ownership), homebuyer assistance, special needs housing, and affordable housing preservation. When funds are available, the Housing Department issues Notices of Funding Availability (NOFAs) and requests for proposals to solicit competitive proposals. For example, in 2020 the City and nonprofit developer BRIDGE Housing entered into a development and loan agreement with \$4,992,683 in funding assistance for the new construction of a 70-unit permanent supportive housing complex for homeless seniors, located on the City-owned "Heritage Square South" site. In 2021, the City partnered with The California Statewide Communities Development Authority (a joint powers authority) to set aside 513 units in the Hudson and Westgate apartment developments for low- and moderate-income households.
- **Land Assemblage/Write-downs.** The City may also provide land write-downs to selected developers in the acquisition and disposition of housing sites and/or surplus properties for the construction or rehabilitation of affordable housing units. Typically, developers acquire and assemble lots before submitting an application for development and City funding. Subject to the availability of funding, the City will continue to seek property acquisition opportunities, consider land write-downs and other creative land subsidies, and assemble sites for affordable housing.
- **Fee Reduction.** Developers of affordable housing are not required to request fee waivers or reductions. Projects with affordable units automatically qualify for fee reductions, which are accounted for at the time of building permit issuance. Affordable projects receive fee reductions of up to \$25,000 per unit, with a cap of \$125,000 per project. Fee modifications are increased progressively for projects that provide a higher percentage of affordable units and deeper income targets. The fee modification also includes a reduced residential impact fee and traffic impact fee for affordable housing. From 2014 to 2019, 17 projects received over \$7 million total in impact fee reductions and fee waivers by providing affordable housing.

**PROGRAM #13: HOMEBUYERS ASSISTANCE PROGRAMS.** Pasadena has traditionally offered several homeownership programs to increase the number of affordable housing opportunities. Though the loss of redevelopment funding has significantly curtailed these efforts, the City will be pursuing additional funding to restore past program efforts.

- **Homebuyer Education.** The City contracts with Neighborhood Housing Services of Los Angeles County (NHS) to provide homebuyers' education and counseling to lower-income renters to purchase housing. Program services also include credit counseling, financial prequalification, referrals, and limited financial assistance to first-time homebuyers. NHS also employs certified foreclosure counselors who work with homeowners and lenders in the home mortgage lending process.
- **Homeownership Assistance.** Because the State loan assistance limits under the CalHome program are insufficient to bridge the financing gap between market sale prices and low-income affordability given the high cost of housing in Pasadena, this program does not work locally. However, CalHome assistance may be helpful to provide deeper income affordability in for-sale housing projects that already require low-income units (e.g., projects subject to density bonus or inclusionary requirements). Thus, developers of such projects may opt to apply to the State for CalHome funds. Also, in 2021 the State awarded Pasadena approximately \$5.6M in Permanent Local Housing Allocation funds through 2026, a portion of which will be used to provide workforce housing down payment assistance loans to homebuyers.

**PROGRAM #14: RENTAL HOUSING ASSISTANCE.** The Housing Department is the federally designated agency for implementing rental assistance programs for income-eligible households, as well eligible families experiencing homelessness, individuals, and persons with special needs. During the COVID-19 pandemic of 2020-2021, temporary rental assistance and rental forgiveness programs at the federal, State, and local level provided safety nets for residents who lost their jobs during the economic shutdown. Those programs are not anticipated to continue during this sixth cycle Housing Element and therefore are not discussed here as programs to be carried through 2029.

- **Housing Choice Vouchers.** The Housing Department issues approximately 1,285 vouchers annually to income-eligible Pasadena residents. The City's priority and preference system for allocating vouchers adhere to the following order: residency, working, disability, veteran, involuntary displacement, and substandard housing.
- **Special Needs.** Pasadena administers vouchers for special needs groups. These include persons living with HIV/AIDS and their families under the Housing Opportunities for Persons with Aids (HOPWA) program. Vouchers are also issued to non-elderly disabled (NED) people under two programs: NED #1 must be selected from the Section 8 waiting list and meet the definition of non-elderly disabled households, and NED #2 provides rental assistance to very low-income people. Federal funds are also allocated for the Continuum of Care (CoC) program.
- **Rapid Rehousing.** The City continues to receive Los Angeles County Measure H funding for rapid rehousing of single adults as well as homelessness prevention for individuals. This funding is contracted out to local, non-profit homeless service providers. In late 2021, the City submitted a new grant application for \$103,667 in Measure H funds. Additionally, the City has allocated \$1.2 million of Emergency Solutions Grant (ESG-CV) funding made available through the CARES Act for rapid rehousing activities. In fiscal year 2022, the City expects to receive Homeless Housing, Assistance, and Prevention Round 2 grant funding from the State of California which will be allocated toward additional rapid rehousing activities. In 2021, the City approved two projects that will provide housing for homeless individuals and seniors: a Salvation Army development and Heritage Square South in Northwest Pasadena.

- **Case Management.** Case management for rental assistance is supported with Los Angeles Measure H funding. This initiative helps rental assistance participants who had previously experienced homelessness to assist them to remain in good standing with the rental assistance program.
- **Rent Stabilization.** In 2019, the California Governor signed AB 1482, which capped rent increases statewide through December 31, 2030. Rent increases are tied to increases in the consumer price index. Given that the legislation applies equally throughout the State, it does not reflect unique conditions in more expensive housing markets like Pasadena's.

**PROGRAM #15: AFFORDABLE HOUSING PRESERVATION.** The City of Pasadena has an expansive inventory of deed-restricted affordable housing and a smaller inventory of market-rate affordable projects. Preserving existing affordable housing, both market rate and government deed-restricted projects, are important goals.

- **Deed-Restricted Affordable Housing.** Pasadena has approximately 3,000 publicly assisted multi-family units that are deed restricted as affordable to lower-income households (owner and rental). Approximately 243 of the covenanted units will come up for renewal by 2031. Properties owned by non-profit entities with an affordable housing mission are less at risk than properties owned by for-profit entities. About half of the units cited above are owned by profit-motivated organizations; most of these units consist of covenanted units within a market-rate multi-family housing development. The City monitors the status of these projects and reaches out to owners to determine ways to preserve the units as affordable. The City proactively monitor the list of at-risk properties, explore funding sources to keep the affordable units as affordable, present options for developers building new projects to preserve at-risk units, and ensure tenants are properly notified of impending conversions as required by State law. For example, in June 2021, the City closed on the transaction to rehabilitate and preserve the 114-unit La Villa Lake senior rental housing complex at 1070 N. Lake Avenue.
- **Market Rate Affordable Housing.** Pasadena helps to preserve market rate housing affordable to lower-income households through acquisition and rehabilitation (Program #3), historic preservation (Program #4), and funding assistance (Program #11). Developers can fulfill their inclusionary housing ordinance obligations by acquiring, rehabilitating, and preserving existing market rate units as affordable housing. Since this is a complex issue, an objective to study options for preserving non-deed-restricted affordable housing and tenant protections is included as an action for this Housing Element.

**PROGRAM #16: HOUSING FOR PEOPLE WITH DISABILITIES.** Pasadena encourages the development of housing suitable for people with disabilities (including developmental disabilities) and funds supportive services to address their needs.

- **Building Design.** The Americans with Disabilities Act (ADA) mandates certain requirements for multi-family housing units to be accessible to people with disabilities. There are also techniques for improving the accessibility of housing through the adoption of principles of "universal design," "visitability," or "barrier free" housing. Features typically include zero-step entrances, wide doorways that can accommodate wheelchairs, and other key features.

- **Reasonable Accommodation.** Pasadena's housing stock was predominantly built before ADA requirements and may not be as accessible as new units. Therefore, the City's municipal code establishes a process for requesting and granting reasonable modifications to zoning, development regulations, building codes, and land use to allow for the fullest access to housing. The City will continue to implement this process to improve access to housing for people with disabilities.
- **Housing Opportunities.** Expanding housing opportunities for people with disabilities (including developmental disabilities) is a necessary step toward achieving Pasadena's housing vision. The City supports the construction of housing and group quarters suitable for people with disabilities. The City allocates vouchers (Program #15) for people with disabilities to live in housing in an integrated setting with other nondisabled people. The City uses federal and state grants, as well as county and local tax revenue, to provide services and permanent housing for the unhoused population, a significant percentage of whom have disabilities. Notably, \$3.15 million of Continuum of Care funding received from the U.S. Department of Housing and Urban Development (HUD) is utilized for the provision of permanent supportive housing to people with a disabling condition.

**PROGRAM #17: HOUSING FOR SENIORS.** Pasadena continues to have a sizable senior population. Many retirement communities have been built in the City since Pasadena was established.

- **Housing Facilities.** Pasadena offers more than 1,200 units of senior housing, the majority of which are deed-restricted affordable to low-income seniors through covenants. In addition, more than 500 housing choice vouchers are allocated to seniors to rent housing in the community. The production of senior housing is also encouraged in multi-family districts, where provisions for parking reductions, density bonus incentives, and fee reductions apply. The City actively seeks partners to preserve affordable senior housing, such as the arrangement with the Retirement Housing Foundation to rehabilitate and preserve the 150-unit Concord senior housing development and the 70-unit Heritage Square rental project for older residents.
- **Life Care Facilities.** As the baby boomer population continues to age and grow, senior housing providers are expanding their housing facilities and services to include "life-care" housing opportunities, ranging from independent and semi-independent to assisted-living housing. The concept is to allow seniors who no longer reside in single-family homes to age in place without having to move to a completely different community or building as their health needs change. To that end, Pasadena works with life-care facility providers and developers to facilitate the construction of senior life-care facilities.
- **At-Risk Seniors.** A significant percentage of grant funding and local dollars spent on homeless services, including Continuum of Care and Emergency Solutions Grant program funding, provide housing and supportive services to seniors. In June 2020, the City and BRIDGE Housing entered into a development and loan agreement for the new construction of a 70-unit permanent supportive housing complex for homeless seniors, located on the City-owned "Heritage Square South" site.
- **Senior Services.** Pasadena seniors benefit from supportive services that enable them to live at home as independently as possible. The City funds organizations that provide

meal and nutrition, recreation, health care, and service programs. Many programs operate from Pasadena's Senior Center. The City's transit line offers subsidized low-cost public transit for seniors. The City also implements its MASH program, which provides free home maintenance, repairs, and property maintenance for eligible seniors.

- **Shared Housing.** Existing housing units can help meet seniors' needs through shared housing programs. Seniors who remain mobile and wish to remain in their single-family homes but may not have the financial resources for maintenance can look for other seniors or younger roommates to reduce living costs. This model can achieve many objectives simultaneously —allow seniors to live independently, provide them with companionship and support with daily care/assistance with tasks, create affordable housing options for students, and encourage intergenerational interactions.

**PROGRAM #18: FAMILY, YOUTH, AND STUDENT HOUSING.** The City of Pasadena implements several programs to assist in developing and providing housing for families, including families with children, emancipated foster-care youth, and college-age persons.

- **Development of Housing for Families.** During the public outreach for this Housing Element, many participants identified the lack of affordable housing for families with children. Residents noted the difficulty of finding three-bedroom or larger apartments and houses that provide the space needed for larger families in particular. Because most new housing production in Pasadena consists of multi-family housing, opportunities to create units with three-plus bedrooms are limited unless incentives or subsidies are provided (as the City has done for the Marv's Place and Summit Grove projects).
- **Housing for Emancipated Youth.** Emancipating youth refers to youth "aging out" of the foster care system, as well as a broader group of youth becoming independent adults before the age of 18. About 1,500 foster youth age out of the Los Angeles County child welfare system each year. Most have nowhere to turn for jobs, housing, education, or support. Studies show that this population is at higher risk of homelessness. The City historically has not provided programs targeted to emancipated foster youth as other programs for affordable apartments and supportive housing help address their needs. The goal is to ensure these youth have access to the information that can help them find appropriate services.
- **Student Housing.** Pasadena is home to Caltech, Fuller Theological Seminary, ArtCenter of Design, Pasadena City College, and other small private colleges that collectively enroll more than 45,000 students. The exceptionally large number of educational institutions in Pasadena creates a high demand for apartments and affordable housing for faculty and students. While Fuller Theological Seminary is moving toward a predominant online presence, ArtCenter has expanded to a second campus on South Raymond Avenue and has plans to provide housing. Pasadena City College supports the educational aspirations for about 29,000 students every year, and statewide data show that as high as 17 percent of these students face housing challenges. The City will continue to work with the private institutions to prepare and update Master Plans to provide additional housing opportunities. Pasadena City College's land use decisions are not subject to City regulation, but Pasadena supports efforts to allow housing on College lands to meet a significant student housing need.

**PROGRAM #19: HOMELESS SERVICES.** Pasadena employs a multi-faceted approach to addressing homelessness, as set forth in its Ten-Year Strategy to End Homelessness. As noted in the 2020 Pasadena Homeless Count, “although we continue to battle complex societal factors that are compounded by long-standing structural inequities, an increasing number of people are successfully getting connected to services and housing.”

- **Continuum of Care.** Pasadena has traditionally implemented a Continuum of Care (CoC) approach to addressing homelessness. A network of service agencies has emerged to address the needs of Pasadena’s homeless population: The Pasadena Partnership to End Homelessness. The Pasadena Partnership is the primary entity in Pasadena focused on meeting the housing and service needs of people experiencing homelessness. As a CoC designee, the Pasadena Partnership receives funding from HUD for its programs. The City’s Housing Department is a collaborative applicant for the CoC funding.
- **Rapid Re-housing/Transition.** Pasadena supplements the CoC system with a Rapid Re-housing Approach, as described in Program #15. This highly successful model provides an option for placing individuals and families experiencing homelessness immediately into permanent housing with supportive services. Rapid re-housing participants are provided with short-term interventions such as deposit assistance; short-term rent subsidies; and stabilization services including case management, budgeting assistance, and assistance to increase income.
- **Motel/Hotel Conversions.** Pasadena has many motels that have the potential to be converted to affordable housing. In 2018, the City passed a hotel/motel conversion ordinance to make it easier to convert existing hotels and motels to affordable housing.
- **Supportive Services.** Pasadena continues to support agencies that provide supportive services to people experiencing homelessness. Services are provided by a network of organizations (nonprofit, local government, for-profit, etc.) addressing both chronic and temporary homeless conditions people of all ages and backgrounds face, with the key goals of providing transitional and permanent housing. This assistance may include food services, job training, mental health, substance abuse recovery, referral services, and other services that enable people to transition to live full and productive lives.

**PROGRAM #20: FAIR HOUSING.** Pasadena’s fair housing program supports its vision of a socially and economically diverse community by facilitating the provision of housing opportunities for all persons, regardless of their status. Pasadena’s efforts to affirmatively further fair housing law are detailed below. Many of the programs involve work of the Human Rights Center through its contract with the City.

- **Fair Housing Services.** Pasadena contracts with nonprofit agencies to promote the enforcement of fair and equal housing opportunity laws. These agencies provide counseling and referrals, landlord and tenant dispute resolution, discrimination and complaint processing, education, outreach, training, technical assistance, advocacy, and relocation assistance. The City implements its Housing Mediation Ordinance, which oversees landlord-tenant disputes.
- **Fair Housing Impediments.** Fair housing concerns have varied over the past decades concurrent with case law, improved awareness, and contemporary

challenges. In accordance with federal and State fair housing law, the City regularly prepares an Analysis of Impediments to Fair Housing Choice that identifies potential impediments and offers a menu of strategies to address them. The City will continue to work with its fair housing provider to affirmatively address identified impediments.

- **Monitoring.** Contracting with non-profit housing organizations, the City will continue fair housing testing every two years starting in 2022. Specifically, upon release of 2020 Census data, random testing will be conducted that reflects the City's changing demographics and emerging fair housing trends. Ensure fair housing testing is conducted in Northwest Pasadena with disproportionate housing needs and displacement risks.
- **Tenant Protection Ordinance.** The City requires property owners to pay relocation assistance for tenants who are involuntarily displaced from housing when the tenant is not at fault. Relocation assistance is required if: 1) the unit is slated for demolition; 2) the building must be vacated due to health and safety violations; or 3) the landlord seeks to remove the unit permanently from the rental market. Tenant protections are also enforceable in the case of condominium conversions. In 2019, updates to the ordinance strengthened tenant protections. The City will strengthen protection efforts as follows:
  - With additional City funding, the Housing Department will continue to provide tenant protections counseling and legal services.
  - Continue implementing the Housing Mediation Ordinance, which oversees landlord-tenant disputes.
  - "Renoviction": By the end of 2022, complete amendments to administrative regulations in the existing Tenant Protection Ordinance (TPO) to close loopholes associated with landlord evictions of tenants for unit improvements.
- **Landlord Education.** The Housing Department supports landlord education through funding to non-profit organizations and partners with the HRC to conduct fair housing workshops and informational flyers. Through the contract, the City will expand outreach and education of the State's Source of Income Protection laws (SB 329 and SB 222) defining public assistance, including housing choice vouchers as legitimate source of income for housing. Also, the City will develop materials regarding source of income protection for distribution to rental property owners, including property owners with ADUs and property owners seeking building permits for small rental complexes such as duplex and triplex developments.
- **Tenant and Homeowner Education.** The City will target dissemination of Fair Housing Outreach information and notices of available services and workshops in Northwest neighborhoods identified with disproportionate housing needs and displacement risks.
- **Unhoused Individuals and Families.** The City will engage Mental Health Advocacy Services to provide fair housing training for homeless services providers who assist with housing locator services.



- **Expanding Housing Opportunities.** A key goal of fair housing is to create opportunities for people to find housing of all types in all neighborhoods. Actions to achieve this goal include:
  - Continue the Second Unit Accessory Dwelling Unit (ADU) Pilot Program to provide easy financing to construct an ADU in exchange for leasing the unit to a Section 8 housing choice voucher holder for seven years. Other options include bringing an unpermitted ADU (e.g., garage conversions) up to code for low- to moderate-income households. The goal is to achieve 20 ADUs over eight years.
  - Initiate a program in 2022 to produce pre-approved ADU building plans to help reduce the cost to property owners of processing building permits and getting a project more quickly to construction.
  - Monitor and review all ADU programs for effectiveness to ensure ADU production and affordability goals are being achieved. As necessary, adjust the incentives to facilitate production.
  - Continue to implement the 2021 modifications to the Local Preference Ordinance for affordable housing (rental or ownership) developed with City subsidy or under the Inclusionary Housing/Density Bonus Ordinances. The modifications created a new priority category and of a new set-aside designed to address displacement (Over-Housed Priority and Former Resident Set-Aside (20 percent of available units).
  - Increase visibility of the <http://pasadenahousingsearch.com> website by publishing an article for the website annually in the City's Pasadena-in-Focus newsletter, which is sent to all Pasadena residents.
  - Work with SocialServe.com (the developer of the <http://pasadenahousingsearch.com> website) to include areas of opportunity as a search feature.
  - In 2021, as part of its Missing Middle policy to address the growing need for "missing middle" housing—rental units affordable to the moderate-income workforce—the City entered a of a Public Benefit Agreement with the California Statewide Communities Development Authority for the acquisition of existing apartment projects Westgate Apartments Phase II and III (340 units) and The Hudson, with 173 units. The City will consider additional projects if opportunities arise during the planning period, with the goals of acquiring 900 total units.
  - Beginning in 2022, promote the City's reduced residential impact fee from \$20,000 to \$3,000 if the developer builds workforce units. Currently, this reduction is not being widely utilized. Promote this incentive during pre-application and initial project reviews.

**PROGRAM #21: EDUCATION AND MONITORING.** Education and monitoring activities are an essential process for evaluating and refining housing programs. The City has three primary

activities geared toward monitoring progress and engaging and educating decision makers and the community about housing policies and programs.

- **Monitoring Program.** For reporting purposes of federal funding programs, Pasadena prepares the required Consolidated Annual Performance Evaluation Report (CAPER) for federal programs. As required by State law, the City prepares the Annual Housing Element Progress report for HCD. The City maintains a tracking program for the specific plans to ensure conformance with General Plan policies regarding development caps (which do not apply to affordable housing production and which the City has committed to removing). Per State law, a similar program will be required to track no-net-loss provisions regarding housing inventory sites identified for affordable housing production.
- **Community/Commission Education.** Housing policy and programs, State and federal mandates, funding sources, and entitlement processes can be confusing to people unfamiliar with their application. To enhance and inform the decision-making process for housing matters and to help the public navigate seemingly complex processes, the City will implement more formal education programs about housing production and policy. Targeted audiences will include elected and appointed City officials, affected City staff, and the public who use and benefit from housing programs and entitlement processes.

**PROGRAM #22: NEIGHBORHOOD AND COMMUNITY PRESERVATION.** Several neighborhoods in Pasadena have home values that have stayed lower than the local median prices due to underinvestment in community infrastructure, historic real estate practices that prevented people of color from buying or renting homes in particular districts, and poorly performing local public schools, among other factors. Like other Pasadena neighborhoods, the lower-income areas contain houses with historic character and local shopping districts that people can walk to. They are culturally rich neighborhoods where families have lived for generations.

With home prices so high in most of the City, homebuyers and institutional investors see the value in the historically undervalued areas and are buying houses at seemingly bargain prices. They may be purchasing properties now rented as affordable units, rehabilitating the home, and “flipping” them to be bought or rented at higher prices. This practice often forces long-term residents to move. Also, however, long-term residents who own the homes are benefitting from increased home values and can build generational wealth formerly not possible. The process of gentrification creates tensions, and those residents who are adversely affected see a loss not just of their home but their neighborhood.

As of 2021, Pasadena did not have any programs specifically to address the adverse impacts of gentrification. However, the City has adopted strategies and programs to address residents’ concerns, such as expanding the middle-income housing supply and providing opportunities for renters to purchase the units they live in. Through the public engagement process for this Housing Element, residents and neighborhood advocates asked for additional actions to allow long-term residents to remain in their neighborhoods of choice.

**PROGRAM #23: ZONING CODE UPDATES.** Beginning in 2017, the California legislature passed several laws aimed at increasing housing production of all types, particularly housing for lower-income and special needs households. To implement the legislation, Pasadena will need to amend its zoning ordinance to address current density bonus regulations, laws

applicable to ADUs, low-barrier navigation centers, supportive housing as a by-right use, and application review processes for projects using streamlined approvals pursuant to SB 35 and SB 330. In the absence of tailored local zoning regulations, State law applies.

**PROGRAM 24: RESOURCE CONSERVATION.** Pasadena encourages sustainable development that reduces energy conservation, protects the environment, and facilitates production of affordable housing. In 2018, the City adopted a Climate Action Plan (CAP) which establishes several strategies applicable to residential development. Notably, the CAP includes a consistency checklist which City staff uses in project review to determine ability of project design features to reduce greenhouse gas emissions.

- **Building Codes.** Pasadena implements the California Green Building Standards Code (CalGreen) to promote sustainable building design and construction practices. Although CalGreen's mandatory provisions apply only to new construction and rehabilitation, the City extends these requirements to additions and alterations. Additional requirements, as permitted under State law, also apply to the residential and mixed-use development.
- **Solar Incentives.** Pasadena Solar Initiative (PSI) promotes the expansion of renewable solar power use locally. Through rebates, additional incentives and education, the PSI aimed to facilitate the generation of 14 megawatts of solar power by 2017. Through these incentives, the City has already facilitated the installation of 380 solar units in residential structures in Pasadena.
- **Water and Sewer Services.** The 2015 General Plan EIR concluded that adequate water supplies are available to meet the projected level of growth, with which this Housing Element conforms. However, statewide drought conditions associated with climate change can be expected to strain water supply. As required by State law, the City has policies in place (City Council resolution #8621) to grant priority for service allocations to proposed projects that include low-income housing. Sewer service capacity continues to be adequate.

### **Regional Housing Needs Assessment Allocation**

Several factors influence the demand for housing in Pasadena, including population growth, the cost of housing, and housing needs of "special needs groups" that include the elderly, large families, female-headed households, households with a physically or developmentally disabled person, farm workers, and the homeless. The 2021-2029 Housing Element Update examines the housing needs of different groups of people based on demographic metrics that include owners versus renters, lower-income households, overcrowded households, elderly households, special needs groups, and homeless persons.

California housing element law requires that each city and county develop local housing programs designed to meet its "fair share" of housing needs for all income groups, based on projected population growth. The California Department of Housing and Community Development (HCD), Housing Policy Division develops Regional Housing Needs Assessments (RHNA) for each region of the State represented by councils of governments. In Southern California, Southern California Association of Governments (SCAG) determines the housing allocation for its member cities and Counties. SCAG has assigned the City of Pasadena a RHNA allocation of 9,429 housing units for the 2021-2029 planning period, divided among the household income categories as shown in Table 2.

<b>Table 2: City of Pasadena Regional Housing Needs Assessment Allocation</b>		
<b>Income Group</b>	<b>Total Allocation (DU)</b>	<b>Income Group Percent</b>
Extremely Low/ Very Low	2,747	29%
Low	1,662	18%
Moderate	1,565	16%
Above Moderate	3,455	37%
<b>Total</b>	<b>9,429</b>	<b>100%</b>
Source: SCAG 2021		

Housing units that have been approved or proposed but not yet built or that are under construction as of June 2021 may be credited toward the RHNA. Table 3 (RHNA Credits and Remaining Need) identifies RHNA credits and the remaining housing need to be accommodated by land use policy and zoning regulations.

<b>Table 3: RHNA Credits and Remaining Need</b>					
	<b>Ex./Very Low Income (0-50% AMI)</b>	<b>Low Income (50-80% AMI)</b>	<b>Moderate Income (80- 120% AMI)</b>	<b>Above Moderate Income (120%+ AMI)</b>	<b>Total</b>
<b>APPROVED PROJECTS</b>					
Outside of Specific Plan areas	28	8	50	102	188
Within Specific Plan areas	43	13	14	1,025	1,095
<i>subtotal</i>	<i>71</i>	<i>21</i>	<i>64</i>	<i>1,127</i>	<i>1,283</i>
<b>PROPOSED PROJECTS</b>					
Outside of Specific Plan areas	72	30	2	118	222
Within Specific Plan areas	186	59	465	1,690	2,400
<i>subtotal</i>	<i>258</i>	<i>89</i>	<i>467</i>	<i>1,808</i>	<i>2,622</i>
<b>Total</b>	<b>329</b>	<b>110</b>	<b>531</b>	<b>2,935</b>	<b>3,905</b>
<b>RHNA</b>	<b>2,747</b>	<b>1,662</b>	<b>1,565</b>	<b>3,455</b>	<b>9,429</b>
<b>Remaining RHNA</b>	<b>2,418</b>	<b>1,552</b>	<b>1,034</b>	<b>520</b>	<b>5,524</b>

State law requires that jurisdictions demonstrate in the Housing Element Update that land inventory is available and adequate to accommodate the RHNA. The City of Pasadena has determined that the inventory of vacant and underutilized residential and mixed-use sites and the estimated production of accessory dwelling units during the planning period are sufficient to accommodate the remaining RHNA of 5,524 units. Sites currently available and appropriate to accommodate a portion of the RHNA are categorized and summarized in Table 4. Figure 2 shows the site inventory locations.

**Table 4: RHNA/Sites Inventory Summary**

Site Type	Affordability Level				Total
	EL/VL Income (0-50% AMI)	Low Income (50-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (120%+ AMI)	
Approved Projects	71	21	64	1,127	1,283
Proposed Projects	258	89	467	1,808	2,622
Sites Available		3,564	1,538	1,402	6,504
ADUs		481	15	210	706
<b>Total Sites</b>		<b>4,484</b>	<b>2,084</b>	<b>4,547</b>	<b>11,115</b>
2021-2029 RHNA	2,747	1,662	1,565	3,455	9,429
RHNA status (- shortfall/+ surplus)		+75	+519	+1,092	+1,686

## 2.5 RELATIONSHIP TO GENERAL PLAN EIR

The 2015 General Plan Update focused on the Land Use and Mobility Elements and Land Use Diagram. The General Plan Update also included the consolidation of optional elements (cultural and recreational, historic and cultural, public facilities, scenic highways, social development, and economic development) into the required elements of the General Plan. The Land Use and Mobility Elements, together with the other General Plan elements, guide the overall physical development and circulation of the entire City through horizon year 2035. Figure 3-5 of the General Plan EIR (GP EIR) - Proposed General Plan Land Use Diagram - shows how land uses would be distributed with the General Plan Update.

The 2015 General Plan assumed a horizon year of 2035 and established a buildout scenario for evaluation in the EIR. Impacts associated with implementation of the 2015 General Plan were evaluated in a Draft and Final General Plan EIR (GP EIR). The GP EIR evaluated the construction of 12,312 net new dwelling units, which were expected to be constructed incrementally through 2035, with most of the City's growth occurring in specific plan areas. As described in the GP EIR, Pasadena had 59,641 housing units in 2013. Per City of Pasadena records, between 2014 and 2020, the City has issued 2,103 certificates of occupancy for residential dwellings.<sup>1</sup> Taking these numbers into consideration, there are approximately 10,209 units remaining in the buildout scenario evaluated in the GP EIR.

It should be noted that the City Council, when adopting the General Plan Update, did adopt a Refined Project, with different development characteristics than were evaluated in the Draft EIR. However, the Final EIR noted that Refined Project would not result in a new significant impact or a substantial increase in the severity of an impact already disclosed in the EIR and that revisions to the EIR, or recirculation of the EIR, were not necessary.

Beginning in 2017, the City initiated updates of the seven specific plans and creation of an eighth for Lamanda Park (comprising parts of the current East Colorado and East Pasadena Specific Plans). Adoption of all specific plans should conclude by the end of 2023. The 2015

<sup>1</sup> City of Pasadena, 2021. Energov System Report, Bld. Permits Issued in Range: 1/1/2021 - 6/30/2021, September 3.

General Plan established residential development caps within each specific plan area. However, affordable housing production is not included within the caps (except within the Fair Oaks/Orange Grove Specific Plan). Also, adoption of the Specific Plans will expand the overall residential capacity in Pasadena by increasing development densities in some areas and allowing residential uses on properties currently zoned exclusively for residential use. Notably, in this Housing Element the City commits to removing the development caps stated in the General Plan, and the Specific Plans will not identify caps.

As described above, SCAG has assigned the City of Pasadena a RHNA allocation of 9,429 housing units for the 2021-2029 planning period, which is within the remaining GP EIR buildout projection of approximately 10,209 dwelling units. As such, the buildout associated with the RHNA allocation could be accommodated by the buildout scenario evaluated within the GP EIR.

Additionally, of the potential units included in the Housing Element Update, approximately 706 units are identified as Accessory Dwelling Units (ADUs). Since adoption of the 2015 General Plan Update, ADU regulations within the State have changed significantly; currently ADUs that are consistent with City standards and State law are now allowed by right with a building permit. The projections analyzed within the GP EIR likely did not anticipate legislative changes which facilitated the increase in ADU development.

Further, it should be noted that sites included in the site inventory could accommodate 11,115 units, which is 1,686 more units than required under the City's RHNA. The City included the identification of these additional parcels to show the ability of the City to meet the requirements and to provide additional flexibility; this EIR Addendum evaluates the potential impacts associated with implementing the Housing Element Update to meet the RHNA allocation (9,429 units), but not the development of all 11,115 potential sites identified in Table 4, above.

## CHAPTER 3

### EVALUATION OF ENVIRONMENTAL IMPACTS

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The following evaluation assesses the environmental impacts of the proposed Housing Element Update in relation to the analysis provided in the GP EIR. Determinations are made as to whether the proposed project would result in new significant impacts or substantially more severe effects, which would trigger the need for a Subsequent or Supplemental EIR.

For each threshold identified below, the following questions are addressed and discussed in the narrative for each issue:

- What is the Housing Element Update impact conclusion?

For each impact identified below, a level of significance of the impact is provided. While criteria for determining significant impacts are unique to each issue area, the environmental analysis applies a uniform classification of the impacts based on the following definitions consistent with CEQA and its implementing CEQA Guidelines:

- **No Impact (NI)** – A designation of no impact is given when no changes in the environment would occur.
  - **Less than Significant Impact (LTS)** – A less than significant impact would cause no substantial adverse change in the environment.
  - **Less than Significant Impact with Mitigation (LTS-M)** – A less than significant impact with mitigation incorporated avoids substantial adverse impacts on the environment with adherence to identified mitigation measures. For those issue areas where the impact of the Housing Element update would be less than significant with the incorporation of the same mitigation measure(s) identified in the GP EIR, the impact is identified as **LTS-M (GP)**. The number of the mitigation measure from the MMRP of the 2015 General Plan are referenced and summarized in Chapter 4.
  - **Significant and Unavoidable Impact (S-U)** – A significant unavoidable impact would cause a substantial adverse effect on the environment, and no feasible mitigation measures would be available to reduce the impact to a less than significant level.
- What is the GP EIR impact conclusion? The issues that were found to be either less than significant or were found to have no impact in the Initial Study prepared for the General Plan Update, and were therefore excluded from further analysis in the GP EIR, are identified with (IS) after the impact conclusion.
  - Does the Housing Element Update involve new significant impacts or substantially more severe impacts than those analyzed in the GP EIR?
  - Are there any new or changed circumstances involving new significant impacts or substantially more severe impacts than those analyzed in the GP EIR?

- Is there any new information of substantial importance that was not and could not have been known at the time of certification of the GP EIR that rises to the level of requiring new analysis or verification?
- Are any new mitigation measures required for the Housing Element Update?



Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>I. AESTHETICS.</b> <i>Would the project:</i>						
a) Have a substantial adverse effect on a scenic vista?	<b>LTS</b>	LTS	No	No	No	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<b>LTS</b>	LTS (IS)	No	No	No	No
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<b>LTS</b>	LTS	No	No	No	No
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<b>LTS</b>	LTS	No	No	No	No
<b>Discussion:</b>  The GP EIR concluded that implementation of the General Plan Update would result in less than significant environmental impacts to aesthetics. Parcels in all areas of the City and its sphere of influence have unused development intensity where new development or redevelopment could occur, changing the visual appearance of their respective neighborhoods. While buildout of the General Plan would visibly alter the neighborhood by allowing new residential and commercial uses on industrial and vacant parcels, thus introducing new						

structures, the GP EIR found that this increased development would not result in a significant aesthetic impact. The overall visual appearance and character of neighborhoods is expected to remain intact and no major obstructions of scenic views are anticipated. For these reasons, and because policies in the General Plan Update and applicable City specific plans and design guidelines focus heavily on land use compatibility and context-sensitive design, the GP EIR concluded no significant impacts to the aesthetic character, quality, or scenic views of the City are anticipated.

As discussed in the GP EIR Initial Study (Initial Study), the General Plan Update would change some land use designations within Specific Plan areas in the City. State Route (SR-2) is a state scenic highway and traverses the northernmost leg of the City that extends along the border of the Angeles National Forest. This area is designated for open space on the City's existing and proposed Land Use map and the General Plan Update would not result in any change or development in this area. As a result, the General Plan Update would not damage scenic resources visible from that highway.

Additionally, a portion of the SR-110—from Colorado Boulevard in central Pasadena to US 101 in downtown Los Angeles—is designated a National Scenic Byway (USDOT 2011) and State Historic Parkway (Caltrans 2007). The General Plan Update would result in land use changes and intensification of development in its specific plan areas. However, these areas are currently built out, and the removal of significant trees, rock outcroppings, or any historic buildings would be inconsistent with this General Plan Update. The City has an extensive tree protection ordinance and adopted measures to protect public trees, landmark trees, native trees and specimen trees. Removal of landmark, native and specimen trees are prohibited unless specific procedures are followed and findings are made and approved by the City. The Initial Study concluded that implementation of the General Plan Update would not substantially damage scenic resources along this byway; impacts would be less than significant.

City is largely built out, the lighting and glare associated with improvements and structures of future development projects would not substantially increase nighttime light within the City. New development or redevelopment would also be required to comply with standards outlined in the Pasadena Municipal Code that address light and glare (Section 17.40.080). Additionally, the Design Guidelines and Municipal Code contain lighting standards that would be applicable to development activity associated with future development that would be accommodated by the General Plan. The GP EIR found this potential impact to be less than significant.

The RHNA allocation described within the Housing Element Update, and development of the number of units identified by the RHNA (9,429 units) would be consistent with the amount of residential development analyzed within the GP EIR. Future residential development associated with implementation of the Housing Element Update would have the effect of incrementally changing the visual character of individual parcels. Future development on the Inventory Sites identified within the Housing Element Update would be subject to applicable General Plan policies and zoning regulations related to height, mass and scale, architectural style, materials, landscaping, and a variety of other standards that would ensure future housing development is consistent with the visual character intended for the area. The Housing Element Update does not include changes to any General Plan land use or zoning designations of any parcel. Impacts due to changes to visual character or quality would be less than significant with implementation of existing regulations and no mitigation measures are required.

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.

Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>II. AGRICULTURAL RESOURCES.</b> <i>Would the project:</i>						
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?	<b>NI</b>	NI (IS)	No	No	No	No
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<b>NI</b>	NI (IS)	No	No	No	No
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 for Timberland Production (as defined by Government Code Section 51104[g])?	<b>NI</b>	NI (IS)	No	No	No	No
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<b>NI</b>	NI (IS)	No	No	No	No

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?	NI	NI (IS)	No	No	No	No
<p><b>Discussion:</b></p> <p>Impacts to agriculture and forestry resources were addressed in the 2015 General Plan EIR Initial Study (Initial Study). As described in the Initial Study, there is no farmland of any category mapped within the City of Pasadena, and the General Plan Update would not convert mapped farmland to nonagricultural use. The zoning code permits commercial growing in designated zoning districts; however, the Initial Study stated that the General Plan Update did not alter uses permitted by the zoning code. The Initial Study also stated that there are no Williamson Act contracts in the City, nor is any part of the City designated as timberland, forest land, or farmland; as such these types of lands would not be converted to another use. The Initial Study concluded there would be no impacts on agriculture and forestry resources.</p> <p>The Housing Element Update does not re-zone or re-designate any parcel within the City from agricultural uses or zones to other uses. In addition, the project does not propose any specific development that would result in the conversion of farmland to non-agricultural use; Inventory Sites identified within the Housing Element Update are located within urban areas. There are no parts of the City designated as timberland, forest land, or farmland; as such, implementation of the Housing Element Update would not result in a conversion of these land uses to another use. Development associated with implementation of the Housing Element Update would not result in the conversion of any agricultural or forest land to non-agricultural or non-forest uses; no impact would occur.</p> <p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>III. AIR QUALITY.</b> <i>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:</i>						
a) Conflict with or obstruct implementation of the applicable air quality plan?	<b>S-U</b>	S-U	No	No	No	No
b) Violate any air quality standard or contribute to an existing or projected air quality violation?	<b>S-U</b>	S-U	No	No	No	No
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?	<b>S-U</b>	S-U	No	No	No	No
d) Expose sensitive receptors to substantial pollutant concentrations?	<b>LTS-M(GP)</b>	LTS-M	No	No	No	No
e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<b>LTS-M(GP)</b>	LTS-M	No	No	No	No

**Discussion:**

The GP EIR found that the General Plan Update would not be consistent with the South Coast Air Quality Management District (SCAQMD) air quality management plan (AQMP) because air pollutant emissions associated with buildout of the General Plan would cumulatively contribute to the nonattainment designations in the South Coast Air Basin (SoCAB). Furthermore, buildout of the General Plan Update would exceed population and employment estimates for the City of Pasadena and therefore those emissions were not included in the regional emissions inventory for the SoCAB used at the time. The Land Use Diagram of the General Plan would increase density and mixed-use development, which would be consistent with regional goals of improving transportation and land-use planning. In addition, the policies of the General Plan would help minimize air pollutant emissions. However, because this additional growth would generate emissions that would cumulatively contribute to the nonattainment designations, the General Plan Update was considered inconsistent with the AQMP, and the GP EIR identified this as a significant impact.

The GP EIR noted that construction activities associated with the Land Use Plan would occur over the buildout horizon of the General Plan Update, which would cause short-term emissions of criteria air pollutants. Information regarding specific development projects, soil types, and the locations of receptors would be needed in order to quantify the level of impact associated with construction activity. Due to the scale of development activity associated with buildout of the Land Use Plan, emissions would likely exceed the SCAQMD regional significance thresholds. Even with implementation of GP EIR Mitigation Measures 2-1, the GP EIR identified this impact as significant and unavoidable.

Buildout in accordance with the General Plan Update would generate long-term emissions that would exceed SCAQMD's regional significance thresholds and cumulatively contribute to the nonattainment designations of the SoCAB. GP EIR Mitigation Measure 2-2, in addition to the goals and policies of the General Plan Update, would reduce air pollutant emissions to the extent feasible. The measures and policies covering topics such as expansion of the pedestrian and bicycle networks, installation of electric vehicle charging stations, and development and implementation of land use policies that promote public and active transit would also reduce criteria air pollutants within the City. However, due to the magnitude of emissions generated by residential, office, commercial, industrial, and warehousing land uses, the GP EIR identified this as a significant unavoidable impact.

Buildout of the General Plan Update could expose sensitive receptors to substantial concentrations of criteria air pollutants and toxic air contaminants. Review of projects by SCAQMD for permitted sources of air toxics (e.g., industrial facilities, dry cleaners, and gasoline dispensing facilities) would ensure that health risks are minimized. GP EIR Mitigation Measure 2-3 would ensure mobile sources of Toxic Air Contaminants (TACs) not covered under SCAQMD permits are considered during subsequent project-level environmental review. Development of individual projects would be required to achieve the incremental risk thresholds established by SCAQMD, and TACs would be less than significant. While implementation of GP EIR Mitigation Measure 2-1 could reduce impacts, localized emissions of criteria air pollutants could exceed the SCAQMD significance thresholds because of the scale of development activity associated with theoretical buildout of the General Plan. In accordance with the SCAQMD methodology, the GP EIR identified the impact associated with criteria air pollutants as significant and unavoidable.

As described in the GP EIR, if new sensitive receptors were sited within 500 feet of I-210 or SR-134 or within the California Air Resources Board (CARB) siting recommendations of other stationary sources, they may be exposed to significant concentrations of air pollutants. Residential land uses could also be near or adjacent to areas designated for commercial and industrial uses and to existing permitted sources. Air quality impacts from placement of sensitive uses near major pollutant sources are considered significant. GP EIR Mitigation Measure 2-4 would ensure that placement of sensitive receptors near major sources of air pollutants would achieve the incremental risk thresholds; with implementation of GP EIR Mitigation Measures 2-4, the GP EIR found this impact to be less than significant.

As described in the GP EIR, industrial land uses associated with the General Plan Update may generate potentially significant odor impacts to a substantial number of people, but implementation of GP EIR Mitigation Measure 2-5 would ensure that odor impacts are minimized and facilities would comply with SCAQMD Rule 402 resulting in a less than significant impact.

The RHNA allocation described in the Housing Element Update, and development of the number of units identified by the RHNA allocation (9,429 units), would be consistent with the amount of residential development analyzed within the GP EIR. Future housing developed in accordance with the goals and policies of the Housing Element Update would have the effect of contributing incrementally to the mobile, energy, and area sources that cumulatively contribute to criteria pollutant levels and associated air pollution in the Basin. Development of future housing would be subject to environmental review pursuant to CEQA upon application for entitlement permits. Projects found to be not exempt from CEQA would be subject to analysis and mitigation, if required. GP EIR Mitigation Measures 2-1 through 2-5 would also be applicable to the development associated with implementation of the Housing Element Update.

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur, nor would the significant unavoidable impacts identified in the GP EIR be worsened. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.



Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>IV. BIOLOGICAL RESOURCES</b> <i>Would the project:</i>						
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 Wildlife or U.S. Fish and Wildlife Service?	<b>LTS-M(GP)</b>	LTS-M	No	No	No	No
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<b>LTS-M(GP)</b>	LTS-M	No	No	No	No
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling,	<b>LTS-M(GP)</b>	LTS-M	No	No	No	No

hydrological interruption, or other means?						
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?	<b>LTS</b>	LTS (IS)	No	No	No	No
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<b>NI</b>	NI (IS)	No	No	No	No
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<b>NI</b>	NI (IS)	No	No	No	No

**Discussion:**

As described in the General Plan EIR, the General Plan Update would not result in land use changes that convert open space to other development uses; however, buildout would allow for development in several areas with vacant residential parcels in the City. These include parcels zoned low-density residential in the San Rafael Hills and tract of land at the northwest of the intersection of Crestford Drive and Florecita Drive, shown on Figure 5.3-2 of the GP EIR, Sensitive Areas Designated for Development. These areas have patches of sage scrub, sagebrush, and chaparral habitats, as well as oak and walnut woodlands, partly on steep slopes. Sensitive plant communities in the region also consist of coastal scrub and riparian oak woodlands. The CNDDB does not include records of sensitive species from these areas, which could be due to the absence of focused surveys in the area. Sensitive species that may now occur in these parcels could be impacted directly or indirectly by buildout of the General Plan Update.

The GP EIR identified four areas where sensitive natural habitats occur to varying degrees, including Arroyo Seco, Eaton Canyon Corridor, Hastings Canyon, and the San Rafael Hills. The land use designation for Arroyo Seco, Eaton Canyon, and Hastings Canyon is Open Space- Parks in the General Plan; no changes were proposed in the boundaries of the Parks land use designation in these areas. Therefore, consistent with the General Plan Update, impacts to sensitive biological resources in these areas was not anticipated.

The GP EIR found that Arroyo Seco, Eaton Canyon, and Hastings Canyon all contain jurisdictional waters, and that the San Rafael Hills contain riparian and/or wetland habitat. No land use changes were proposed in these areas; however, the GP EIR stated that future development of vacant parcels or redevelopment in this area could impact waters.

The GP EIR concluded that buildout of the General Plan Update could have potentially significant impacts to sensitive species, sensitive natural communities, and jurisdictional waters and/or wetlands. GP EIR Mitigation Measures 3-1 through 3-6 would ensure that a qualified biologist would be involved in the assessment, mitigation, and monitoring of all projects occurring on land where impacts to biological resources could be potentially significant; with implementation of the identified mitigation measures, these potential impacts would be considered less than significant.

The Initial Study found that development projects would be required to comply with Chapter 17.44 (Landscaping) of the City's Zoning Code, and the Migratory Bird Treaty Act (MBTA), as applicable. As such, the General Plan Update's impact on overland wildlife movement and migration would be less than significant and the General Plan Update would not conflict with the City's tree protection ordinance. Additionally, the Initial Study prepared for the GP EIR indicated that there are no adopted habitat conservation or natural community conservation plans within the City and, as such, concluded that no impacts to such plans would result from the General Plan Update.

The RHNA allocation described in the Housing Element Update, and development of the number of units identified by the RHNA allocation (9,429 units), would be consistent with the amount of residential development analyzed within the GP EIR. Any future development would be required to comply with existing regulations to protect waterways, wetlands, riparian habitat, and water quality during construction and operation of the developments. Additionally, biological resources mitigation measures identified in the GP EIR would be applicable to development on Inventory Sites that could have biological resources. Similar to the General Plan Update, development associated with implementation of the Housing Element Update would be required to comply with the City's Master Street Tree Plan, Chapter 17.44 (Landscaping) of the City's Zoning Code, and the Migratory Bird Treaty Act (MBTA), as applicable. Therefore, development associated with implementation of the Housing Element Update would not conflict with the City's tree protection ordinance and impacts to wildlife movement and migration would be less than significant. Additionally, as indicated in the Initial Study, there are no adopted habitat conservation or natural community conservation plans within the City; therefore, the proposed Housing Element Update would not result in impacts to any such plans.

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.

Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>V. CULTURAL RESOURCES</b> <i>Would the project:</i>						
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	<b>LTS-M(GP)</b>	LTS-M	No	No	No	No
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	<b>LTS-M(GP)</b>	LTS-M	No	No	No	No
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<b>LTS-M(GP)</b>	LTS-M	No	No	No	No
d) Disturb any human remains, including those interred outside of formal cemeteries?	<b>LTS</b>	LTS	No	No	No	No
<b>Discussion:</b>  The GP EIR found that while the General Plan Update did not propose the alteration or demolition of any historic landmarks, any development under buildout of the General Plan Update could potentially impact a historic resource, as the GP EIR notes there are approximately 7,440 historical resources throughout the City. The GP EIR states that the likelihood of encountering and impacting a historical resource is greater within a historic neighborhood and that future projects under the buildout of the General Plan Update can avoid significantly impacting historical resources by adhering to the Pasadena Municipal Code 17.61.030 design review, to state and						

federal regulations, and to the policies of the City's Land Use Element, including Policy LU 8.5, Scale and Character of New Construction in Designated Landmark and Historic Districts. Additionally, GP EIR Mitigation Measure 9-4, which is discussed in Section XIII, would ensure that vibrations from construction activity would not impact architectural structures of historical significance. Pasadena Municipal Code Section 17.62.090 identifies specific procedures and findings required prior to demolition of a designated historic resource or new construction in a landmark or historic district.

As described in the GP EIR, due to the limited number of archaeological resources documented and the built out nature of the City, impacts to archaeological resources are anticipated to be low. However, development or redevelopment may occur where deep excavations may unearth previously undisturbed areas. Impacts to archaeological resources can be reduced to a less than significant level upon implementation of GP EIR Mitigation Measure 4-1, which would halt construction upon discovery of an archaeological resource and require consultation with a registered archaeologist before proceeding with development.

The GP EIR lists the Topanga Formation as an area sensitive to paleontological resources and states that implementation of GP EIR Mitigation Measure 4-2, which would enlist the service of a registered paleontologist prior to any grading activity in the vicinity of this area, as a sufficient measure to reduce the impact to a less than significant level.

The GP EIR concluded that grading activities are not expected to disturb human remains. Should human remains be discovered, California Health and Safety Code Section 7050.5 requires that if human remains are discovered within the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation and made recommendations to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact the Native American Heritage Commission. Public Resources Code Section 5097.98 mandates the process to be followed in the event of a discovery of any human remains. These regulations ensure that any remains encountered during grading activities would not be disturbed.

Implementation of the Housing Element Update is not anticipated to result in significant cultural resources impacts. As noted above, that potential development would avoid significantly impacting historical resources by adhering to the Pasadena Municipal Code 17.61.030 design review, to state and federal regulations, and to the policies of the City's Land Use Element, including Policy LU 8.5, Scale and Character of New Construction in Designated Landmark and Historic Districts. Additionally, GP EIR Mitigation Measure 9-4, which is discussed in Section XIII, would ensure that vibrations from construction activity would not impact architectural structures of historical significance. Pasadena Municipal Code Section 17.62.090 identifies specific procedures and findings required prior to demolition of a designated historic resource or new construction in a landmark or historic district. Therefore, implementation of the Housing Element Update is not expected to significantly impact historic resources.

If archaeological resources are discovered during construction of any project associated with implementation of the Housing Element Update, GP EIR Mitigation Measure 4-1 would ensure the impact level would be less than significant. The GP EIR lists the Topanga Formation as an area sensitive to paleontological resources; should development occur within this area, implementation of GP EIR

Mitigation Measure 4-2 would measure to reduce the impact to a less than significant level. Disturbance of human remains is not expected, and adherence to existing regulations would reduce this potential impact to a less than significant level.

The current CEQA Guidelines Appendix G checklist also includes assessment criteria for potential impacts to tribal cultural resources. Tribal cultural resources are defined in Public Resources Code section 21074 as either a site, 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. These types of resources were analyzed in the GP EIR and Native American consultation was conducted. The GP EIR concluded that the results of the Native American consultation did not result in new information or unknown impacts, but that while there are no known sacred lands within the City, the potential to uncover archaeological resources during grading remains. GP EIR Mitigation Measure 4-1 would be applicable if any archaeological resources, including tribal cultural resources, are discovered during construction, reducing the impact level to less than significant.

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.

Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>VI. ENERGY</b> <i>Would the project:</i>						
a) Conflict with adopted energy conservation plans?	<b>LTS</b>	LTS (IS)	No	No	No	No
b) Use non-renewable resources in a wasteful and inefficient manner?	<b>LTS</b>	LTS (IS)	No	No	No	No
<p><b>Discussion:</b></p> <p>As described in the Initial Study, buildout of the General Plan Update would result in greater intensification and new development. However, new development and redevelopment in accordance with the General Plan Update would be designed to comply with the performance levels of the City's Green Building Standards Code (14.04.504), the City's Green Action Plan, and the Open Space and Conservation Element of the adopted General Plan, which would reduce energy consumption compared to the existing buildings. All new buildings would be required to achieve at least a 15 percent increase in energy efficiency compared to the 2008 Building and Energy Efficiency Standards. Development associated with the General Plan Update would comply with adopted energy conservation plans and the Initial Study described these impacts as less than significant.</p> <p>Construction activities would also use energy and resources. As described in the Initial Study, future development would be consistent with the City's Green Building Standards Code, Green City Action Plan, and adopted General Plan Conservation and Open Space Element. The City of Pasadena has adopted an amended 2010 California Green Building Standards Code (CAL Green) (City of Pasadena Municipal Code, Chapter 14.04, Green Building Standards Code, Section 14.04.504). The adoption of the code promotes energy conservation by mandating certain building requirements that are currently voluntary under CALGreen requirements. In addition, The City developed an Action Plan (2006) to create a more sustainable City capable of meeting growing demand and reducing impacts to natural resources. Since new development would be concentrated in developed urban areas it would tie into the existing</p>						

infrastructure from mains, lines, and substations in the area. New development and redevelopment would be required to comply with the requirements of the City's Green Building Standards, which result in a 15 to 30 percent increase in building energy efficiency compared to the 2008 Building and Energy Efficiency Standards. Consistency of the above programs and regulatory requirements would ensure that future development under the General Plan Update would not use non-renewable resources in a wasteful and inefficient manner. These potential impacts were considered less than significant.

The RHNA allocation described in the Housing Element Update, and development of the number of units identified by the RHNA allocation (9,429 units), would be consistent with the amount of residential development analyzed within the GP EIR. All development would need to comply with City's Green Building Standards Code (14.04.504), the City's Green Action Plan, and the Open Space and Conservation Element. As with implementation of the General Plan Update, the Housing Element Update would not conflict with an adopted conservation plan or resources in a wasteful or inefficient manner; these potential impacts would be considered less than significant.

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.



Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>VII. GEOLOGY AND SOILS</b> <i>Would the project:</i>						
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 California Geological Survey Special Publication 42.	<b>LTS</b>	LTS (IS)	No	No	No	No
ii. Strong seismic ground shaking?	<b>LTS</b>	LTS (IS)	No	No	No	No
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?	<b>LTS</b>	LTS (IS)	No	No	No	No

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?	<b>LTS</b>	LTS (IS)	No	No	No	No
b) Result in substantial soil erosion or the loss of topsoil?	<b>LTS</b>	LTS (IS)	No	No	No	No
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?	<b>LTS</b>	LTS (IS)	No	No	No	No
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?	<b>LTS</b>	LTS (IS)	No	No	No	No
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?	<b>NI</b>	NI (IS)	No	No	No	No

**Discussion:**

Geology and soils were addressed in the Initial Study prepared for the GP EIR, which found that impacts to this topic would be less than significant. As described in the Initial Study, one Alquist-Priolo earthquake fault zone passes through the City, along the Raymond Fault, in two places in the City near the south City boundary. In addition, as shown in the General Plan Safety Element, two active faults and one possible active fault are mapped in the City: an active strand of the Sierra Madre Fault passes through the northwest part of the City north of Devil's Gate Reservoir; the Raymond Fault passes through the southernmost part of the City; and a possibly active strand of the Sierra Madre Fault passes through the north-central and northwestern parts of the City near and north of Washington Boulevard. During seismic activity, active faults could experience surface rupture. Any future development projects pursuant to the General Plan Update would be required to comply with all applicable Building and Safety division requirements. Further, the City's Building Code (Pasadena Municipal Code, Title 14) requires future development to submit an engineering geology report and soils

engineering report to identify and mitigate geology conditions and hazards. Compliance with the CBC and City Building Code would ensure impacts would be less than significant.

Development under the General Plan Update would expose new structures and residents in Pasadena to seismic ground shaking. Future development would be designed and built in compliance with the California Building Code (CBC). The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground motion with specified probability of occurring at the site or in the area. Compliance with the CBC and City Building Code would ensure impacts would be less than significant.

As noted in the Initial Study, there are zones of required investigation for liquefaction in the western and northwestern parts of the City near the Arroyo Seco; near the southwest corner of the City in the San Rafael Hills; and in the northeastern part of the City near Eaton Canyon and Hastings Canyon, as mapped in the General Plan Safety Element. Each project developed pursuant to the General Plan Update would be required to have a site-specific geotechnical investigation conducted. The geotechnical investigations for each respective project would evaluate liquefaction potential at the affected project sites and provide any needed recommendations for minimizing hazards from liquefaction and other seismic ground failure. In addition, development must also comply with seismic safety regulations in the CBC and City of Pasadena Building Code. Compliance with the CBC and City Building Code would ensure impacts would be less than significant.

The Initial Study concluded that natural water erosion potential of soils in Pasadena is low, unless these soils are disturbed during the wet season. Erosion can be dramatically accelerated by soil disturbance and soil exposure by construction activities if effective soil erosion measures are not used. Water erosion during construction of projects developed in accordance with the General Plan Update would be minimized by limiting construction to dry weather, covering exposed excavated dirt during periods of rain, and protecting excavated areas from flooding with temporary berms. Soil erosion after construction would be controlled by implementation of approved landscape and irrigation plans. The City of Pasadena requires, as a standard condition of approval, that these plans be submitted to the Zoning Administrator and Design staff for review and approval prior to the issuance of building permits for each project. Additionally, any project which involves more than 250 cubic yards of cut or fill grading would have an erosion and sediment transport control plan as part of the applicant's grading plan, as a standard condition of approval by the City of Pasadena. The grading plan must be approved by the Building Official and the Public Works Department prior to the issuance of any building permits. The Initial Study found this potential impact would be considered less than significant.

As described in the 2015 General Plan Update Initial Study, there are known areas in Pasadena with unstable soils that could result in on- or offsite landslides, lateral spreading, liquefaction, or collapse. Development proposing structures for human occupancy would be required to have a geotechnical investigation conducted per CBC and the City's Building Code. The geotechnical investigation would include site-specific assessment of hazards from subsidence and collapsible soils. Each project would be required to comply with recommendations in the geotechnical investigation report for that project ensuring that impacts are less than significant.

The Initial Study describes that expansive soils may be present within Pasadena, and development may be proposed and/or located on expansive soils. However, projects built in accordance with the General Plan Update would be required to comply with applicable Building and Safety regulations and the CBC. The geotechnical investigation would be prepared and include site-specific assessment of hazards from the potential for expansive soils. Each project would be required to comply with recommendations in the geotechnical investigation report for that project; the Initial Study concluded that expansive soils impacts would be less than significant.

There are existing sewers serving the entire urbanized portions of the City of Pasadena. Projects developed in accordance with the General Plan Update would include sewer laterals and would not rely on septic tanks or other alternative wastewater disposal systems. No impact would occur.

Development associated with implementation of the Housing Element Update would fall within the same City boundaries as were analyzed within the Initial Study, and would be subject to similar risks and associated potential impacts related to geology and soils. The Housing Element Update would not cause new or more significant impacts beyond those analyzed in the Initial Study. Additionally, development associated with implementation of the Housing Element Update would be required to adhere to the regulations, policies, and standards pertaining to geology and soils impacts, both during construction and operation, including the preparation of project-specific geotechnical investigations for individual development projects.

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.

Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>VIII. GREENHOUSE GAS EMISSIONS</b> <i>Would the project:</i>						
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<b>S-U</b>	S-U	No	No	No	No
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<b>LTS</b>	LTS	No	No	No	No
<b>Discussion:</b>  As described in the GP EIR, buildout of the General Plan Update would result in a substantial increase in GHG emissions compared to existing conditions. Additionally, community-wide GHG emissions would not meet the long-term GHG reductions goal under Executive Order S-03 -05. The climate action plan/GHG reduction plan required by GP EIR Mitigation Measure 5-1 would ensure that GHG emissions from buildout of the General Plan Update would be minimized. However, at the time the General Plan EIR was certified, there was not certainty that the climate action plan required by GP EIR Mitigation Measure 5-1 would attain the AB 32 targets. Also, additional statewide measures would be necessary to reduce GHG emissions under the General Plan Update to meet the long-term GHG reduction goals under Executive Order S-03 -05, which identifies a GHG reduction target of 80 percent from 1990 levels by year 2050. At the time of adoption of the General Plan, there was no plan past 2020 that demonstrated attainment of the long-term GHG reduction goal established under Executive Order S-03-05. As identified by the California Council on Science and Technology, the						

state cannot meet the 2050 goal without major advances in technology (CCST 2012). Since no additional statewide measures were currently available, the GP EIR identified this impact as significant and unavoidable.

The GP EIR found that the General Plan Update would not conflict with the CARB Scoping Plan or the Southern California Association of Governments' (SCAG) 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

The RHNA allocation described in the Housing Element Update, and development of the number of units identified by the RHNA allocation (9,429 units), would be consistent with the amount of residential development analyzed within the GP EIR. Any new development would be subject to the policies of the City's current Climate Action Plan, which was adopted in 2018 to fulfill the requirements under GP EIR Mitigation Measure 5-1, as well as any additional climate action/GHG reduction plans established locally, state-wide, or federally at the time.

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur, nor would the significant unavoidable impacts identified in the GP EIR be worsened. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.

Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>IX. HAZARDS AND HAZARDOUS MATERIALS</b> <i>Would the project:</i>						
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<b>LTS</b>	LTS	No	No	No	No
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?	<b>LTS</b>	LTS	No	No	No	No
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<b>LTS</b>	LTS	No	No	No	No
d) Be located on a site that 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?	<b>LTS</b>	LTS	No	No	No	No

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?	<b>NI</b>	NI (IS)	No	No	No	No
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?	<b>LTS</b>	LTS (IS)	No	No	No	No
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<b>LTS</b>	LTS	No	No	No	No
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?	<b>LTS</b>	LTS	No	No	No	No

**Discussion:**

As described in the GP EIR, development in accordance with the General Plan Update would result in infill development and intensification of land uses within the City. During construction, new development pursuant to the General Plan Update would involve the use of hazardous materials, such as fuels, lubricants, paints, solvents, and greases in construction equipment and coatings used in construction. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short-term in nature and would be required to conform to existing laws and regulations.

The City of Pasadena has ordinances regulating hazardous materials management in accordance with state law: Municipal Code Title 8, Chapter 8.80, Handling and Disclosure of Hazardous Materials. As noted in the GP EIR, the General Plan Update contains policies and programs to ensure compliance with federal, state, and local regulations relating to hazardous waste production, use, storage, transport, or disposal of hazardous materials so that impacts to the environment and sensitive land uses are mitigated. General Plan Policy H-1.3 states that new proposed facilities involved in the production, use, storage, transport, or disposal of hazardous materials will be a safe distance from existing sensitive land uses; conversely, new sensitive facilities will not be allowed near existing sites that use, store, or generate hazardous materials. Additionally, the use, storage, transport, and disposal of hazardous materials by residents



and commercial businesses would be required to comply with existing regulations of several agencies, including California Department of Toxic Substances Control (DTSC), the EPA, Cal/OSHA, Pasadena Fire Department (PFD), and Los Angeles County Fire Department (LACoFD). Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur.

As described in the GP EIR, land use changes associated with implementation of the General Plan Update may result in impacts related to the emission or handling of hazardous materials near schools. For new school sites that receive state funding or for existing school sites with new construction, the DTSC oversees school site approval for potential hazards in soil at the site or from potential hazardous waste impact from nearby parcels. The California Department of Education oversees the evaluation of air quality hazards within a quarter mile of permitted and nonpermitted hazardous emission sources to new and expanding school sites.

An environmental database search conducted for the General Plan Update identified 881 separate hazardous materials sites in a 0.25-mile-buffer zone surrounding the City. As described in the GP EIR, due to the fact that there are sites undergoing investigation and/or remediation within the City, impacts from hazardous substance contamination on or adjacent to specific project developments in the City may occur. Future development in accordance with implementation of the General Plan Update may be impacted by hazardous substance contamination remaining from historical operations on a particular site. However, properties contaminated by hazardous substances are regulated at the federal, state, and local levels and are subject to compliance with stringent laws and regulations for investigation and remediation. For example, compliance with the CERCLA, RCRA, California Code of Regulations, Title 22, and related requirements would remedy any potential impacts caused by hazardous substance contamination. Therefore, impacts resulting from buildout of the General Plan Update would be less than significant upon compliance with existing laws and regulations. Furthermore, Policy LU 3.5, Hazardous Uses, is proposed to prohibit or control land uses that pose potential health and environmental hazards to Pasadena's neighborhoods and districts. The GP EIR concluded that compliance with state law would ensure that impacts of General Plan buildout from listed hazardous materials sites would be less than significant.

The Initial Study identified that the nearest public use airports are El Monte Airport in the City of El Monte, 4 miles to the southeast, and Bob Hope Airport in Burbank, 9.2 miles northwest of the City boundary. No portion of the City is within an airport land use plan or within two miles of an airport.

There are two heliports in Pasadena and one immediately adjacent to the City. These heliports are private facilities not open for public use. Over congested areas, helicopters must maintain an altitude of at least 1,000 feet above the highest obstacle within 2,000 feet of the aircraft, except as needed for takeoff and landing (Code of Federal Regulations Title 14 Section 91.119). The Federal Aviation Administration does not regulate heights of structures near private heliports. Implementation of the General Plan Update would intensify development within areas that are already built out. In addition, the General Plan Update would not allow the development of buildings with increased height that would affect flight patterns or pose a safety hazard. Therefore, General Plan Update implementation would not result in a safety hazard for people residing or working near a private airstrip or heliport.

As described in the GP EIR, the Los Angeles County Operational Area Emergency Response Plan provides the framework for responding to major emergencies or disasters. The goals of this plan are to outline a strategy to prepare for, respond to, and recover from an emergency or disaster for 88 cities, 137 communities and 288 special districts in the county. Additionally, the Pasadena Fire Department (PFD) provides emergency response services to the City of Pasadena, including hazardous materials emergency response. Buildout of the General Plan Update would not interfere with the implementation of the Pasadena EOP because the plan would be followed by new residents and the project does not interfere with operations of the PFD, police department, or other agencies that would respond in the event of a disaster or major emergency in Pasadena. No project would be permitted to block any designated evacuation routes. Impacts would be less than significant.

The current CEQA Guidelines Appendix G checklist also includes assessment criteria for potential impacts to wildfire for those areas located within or near a state responsibility area or on lands classified as Very High Fire Hazard Severity Zones. As shown in Figure 5.6-1 of the GP EIR, CAL FIRE classifies areas in Pasadena as very high fire hazard severity zones in the western portion of the planning area west of the Arroyo Seco and the hillsides in the northwestern and northeastern portions of Pasadena. The West Gateway Specific Plan, along Arroyo Boulevard north and south of its intersection with Westminster Drive, abuts a very high fire hazard severity zone in the San Rafael Hills. Buildout of the residential areas within the very high fire severity zone west of the Arroyo Seco and adjacent to hillside areas, could expose additional people and structures to wildland fire hazards.

As described in the GP EIR, fire suppression services in Pasadena are provided by the PFD and through a mutual aid agreement with LACoFD. To help protect the City and its residents from fire hazards, the City of Pasadena has building and fire codes that must be followed. The fire chief may also use his/her authority to instate certain building, planning, or landscaping requirements. Pasadena addresses the issue of weeds and other vegetation as potential fire hazards and prevention measures in Municipal Code, Title 14, Chapter 14.29. Specifically, the Hazardous Vegetation Ordinance provides a fire prevention partnership between the City and property owners to prevent disastrous fires. The ordinance minimizes fire danger by minimizing density and regulating placement of flammable vegetation. Each spring, the PFD does a mail-out for residents within the City-designated urban-interface zone to remind property owners of their responsibility to mitigate hazardous vegetation conditions. Hazardous Vegetation Inspection Notices indicate the level of fire safety and where any mitigation action is required of the property owner.

Additionally, the City of Pasadena has adopted the 2010 California Fire Code, as amended, a modification of the International Fire Code. Provisions include sprinkler and fire hydrant requirements in new structures and remodels, road widths and configurations designed to accommodate the passage of fire trucks and engines, and requirements for minimum fire flow rates for water mains. The City has also adopted the California Building Code that includes sections on fire-resistant construction material requirements based on building use and occupancy. The construction requirements are a function of building size, purpose, type, materials, location, proximity to other structures, and the type of fire suppression systems installed. Furthermore, the City's General Plan Safety Element provides goals and policies to minimize the risk of fire hazard. Policy R-1 ensures that there is adequate infrastructure and response times, R-2 requires all new development in a high fire hazard area to provide fire retardant landscaping, and R-3 requires the City to assess secondary water supplies for emergency fire flow needs. Development proposed within high-fire hazard areas will be required to implement fire

management plans. Because the State of California, County of Los Angeles, and City of Pasadena require adherence to building codes and review by the fire department to reduce fire hazards, impacts on fire hazards resulting from implementation of the General Plan Update would be less than significant. Buildout of the General Plan Update would not expose people or structures to substantial wildfire hazards, and the GP EIR determined that impacts would be less than significant.

Construction of development associated with implementation of the Housing Element Update could potentially involve the transport, use, and/or disposal of hazardous materials; however, all development would comply with the California Health and Safety Code, OSHA, and SCAQMD regulations. Implementation of the Housing Element Update would result in additional residential uses within the City, and significant impacts related to the transport, use, and/or disposal of hazardous materials are not typically associated with residential land uses. Construction of residential units would not be anticipated to result in sustained and prolonged use of hazardous materials resulting in a significant hazardous materials impact. In addition, future development would be required to comply with CERCLA, RCRA, California Code of Regulations, Title 22, and related requirements, as well as adherence to the City's Land Use Element Policy LU 3.5: Hazardous Uses. Future development associated with implementation of the Housing Element Update could result in temporary road closures; all future development would be required to coordinate with the PFD. Additionally, buildout of the Housing Element Update is not anticipated to interfere with the Los Angeles County Operational Area Emergency Response Plan or the City's Emergency Operation Plan and no future development project would be permitted to block any designated evacuation routes.

The current CEQA Guidelines Appendix G checklist also includes assessment criteria for potential impacts to wildfire for those areas located within or near a state responsibility area or on lands classified as Very High Fire Hazard Severity Zones. There are some inventory sites located within areas identified as Very High Fire Hazard Severity Zones within the GP EIR. Development proposed within high-fire hazard areas will be required to implement fire management plans.

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.

Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>X. HYDROLOGY AND WATER QUALITY</b> <i>Would the project:</i>						
a) Violate any water quality standards or waste discharge requirements?	<b>LTS</b>	LTS	No	No	No	No
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)?	<b>LTS</b>	LTS	No	No	No	No
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	<b>LTS</b>	LTS	No	No	No	No

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or offsite?	<b>LTS</b>	LTS	No	No	No	No
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?	<b>LTS</b>	LTS	No	No	No	No
f) Otherwise substantially degrade water quality?	<b>LTS</b>	LTS	No	No	No	No
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?	<b>LTS</b>	LTS	No	No	No	No
h) Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	<b>NI</b>	NI (IS)	No	No	No	No
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?	<b>LTS</b>	LTS	No	No	No	No
j) Inundation by seiche, tsunami, or mudflow?	<b>LTS</b>	LTS	No	No	No	No

**Discussion:**

As described in the GP EIR, future development within the City would need to comply with provisions of Chapter 8.70 of the City's Municipal Code, which prohibits discharge of certain pollutants into the City's storm drain system, regulates illicit connections to the storm-drain system, requires implementation of permanent BMPs, and specifies requirements for natural watercourse protection. The Regional Water Quality Control Board (RWQCB) also requires industrial projects and land uses that generate stormwater or discharges that can directly affect water courses or water bodies to obtain individual water discharge requirements (WDRs) and/or water quality certifications. Compliance with WDR conditions of approval and/or water quality certifications would prevent the violation of water-quality standards. Implementation of these programs and regulatory requirements would reduce stormwater pollutants that could affect water quality in the Arroyo Seco and/or Eaton Wash, thus reducing impacts related to stormwater pollution and water quality to less than significant levels.

As described in the GP EIR, future development within the City is not anticipated to result in a significant increase in impervious surfaces as most of the area is already built out. Any increase in impervious surfaces would reduce infiltration, which could lead to reduced groundwater recharge. There are two groundwater recharge areas in Pasadena: the Arroyo Seco Spreading Basins and the Eaton Canyon Spreading Basins. The Pasadena Department of Water and Power (PWP) has water rights to divert up to 25 cubic feet per second (cfs) from the Arroyo Seco to the Arroyo Seco Spreading Basins and up to 8.9 cfs from Eaton Wash to the Eaton Canyon Spreading Basins. This water is used to recharge the Raymond Groundwater Basin. The General Plan Update would not result in land-use changes or development on or near these spreading grounds. Future development would not interfere with groundwater recharge that takes place in the recharge basins. Build out of the General Plan Update area could lead to an increased demand for water, which could lead to an increase in groundwater pumping. However, the Raymond Groundwater Basin is adjudicated by the Raymond Basin Management Board (RBMB), which oversees the amount of groundwater that can be extracted by each water purveyor to prevent groundwater overdraft. The GP EIR concluded the General Plan Update would not result in a significant reduction in groundwater recharge or groundwater resources.

Buildout of the General Plan Update has the potential to result in an increase in impervious surfaces, thus creating an increase in stormwater runoff, higher peak discharges to drainage channels, and the potential to cause erosion or sedimentation in drainage swales and streams. Increased runoff volumes and velocities could create nuisance flooding in areas without adequate drainage facilities. However, this is unlikely to occur because the City is nearly fully developed with a mixture of urban and suburban land uses. Although implementation of the General Plan Update is not anticipated to result in a significant increase in stormwater runoff, development and redevelopment activities would alter existing drainage patterns. New storm-drain infrastructure for new development projects would be required to be designed in accordance with standards set forth in the Los Angeles County Department of Public Works (LACDPW's) Hydrology Manual (2006). In addition, new storm drains would be required, under Pasadena Municipal Code Chapter 8.70, to control the rate of discharge to the City's storm-drain system such that the rate of discharge would not increase from existing conditions. This may require the filtration and/or retention of stormwater onsite. All drainage and flood-control structures and improvements are subject to review and approval by the City of Pasadena Public Works Department. Also, new project applicants must submit a drainage plan to

the Planning and Development Department as well as the Department of Public Works for approval prior to issuance of grading or building permits. The GP EIR concluded that compliance with these requirements would ensure that potential impacts related to stormwater conveyance and flooding would be less than significant.

As noted in the Initial Study, there are no 100-year flood zones, as designated by the Federal Emergency Management Agency (FEMA), in the City of Pasadena; however, parts of the City do lie within a dam inundation zone. As described in the GP EIR, the City of Pasadena is in the Devil's Gate Dam and Eaton Wash Dam inundation zones. Dams in California are continually monitored by various governmental agencies, including the Division of Safety of Dams (DSOD) and the Army Corps of Engineers (Corps). Dam owners are required to maintain Emergency Action Plans that include emergency warnings and procedures for damage assessment. Devil's Gate Dam is just north of Oak Grove Drive and the 210 Freeway. The dam inundation zone for Devil's Gate Dam, which is shown in Figure 5.7 -4 of the GP EIR, follows the Arroyo Seco floodway and is zoned primarily as open space, although a very small portion of the dam inundation area is zoned as low density residential. None of the potential development areas in the General Plan Update are in this dam inundation zone; the West Gateway Specific Plan is just east of the dam inundation zone. Therefore, implementation of the General Plan Update would not place any housing within the dam inundation zone of Devil's Gate Reservoir. The dam inundation map for Eaton Wash Dam, which is shown in Figure 5.7-4 of the GP EIR, shows that the inundation zone encompasses the Eaton Canyon Spreading Basins and extends to Grayburn Road to the south, Eaton Wash to the west, and South Rosemead Boulevard to the east. Some areas designated Low Density Residential, and the East Pasadena Specific Plan area, where additional housing is planned, are within the dam inundation zone. The dam inundation map shows a travel time of approximately 15 minutes for floodwater to reach the northern portion of the East Pasadena Specific Plan area. However, the probability that there would be significant water behind the dam coinciding with a dam breach is extremely low. Due to the lack of appreciable amounts of water behind Eaton Wash Dam and the implementation of evacuation plans as specified in the Safety Element of the General Plan, additional housing proposed in the General Plan Update would not expose people or structures to a significant risk of loss, injury, or death in the case of dam failure and impacts are considered to be less than significant.

As described in the Initial Study, a tsunami is a series of ocean waves usually caused by a sudden displacement of the ocean floor, most often due to earthquakes. Elevations in the City range from about 560 feet on the south City boundary in the San Gabriel Valley, to 3,400 feet in the San Gabriel Mountains at the northwest corner of the City, and the City is 25 miles inland from the Pacific Ocean; therefore, the City is not at risk of flooding due to tsunamis. A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. There are no major locations of standing water in the City that would likely be impacted by seiche. There are no potential impacts related to seiche.

As noted in the GP EIR, a mudflow is a landslide composed of saturated rock debris and soil with the consistency of wet cement. The City's hillsides are vulnerable to slope instability, which can result in small slides, slumps, soil slips, rock falls, and debris flows. Debris flows have occurred in the past in some of the canyons near the Pasadena area in the upper reaches of the watersheds. However, none of the areas proposed for future development in the General Plan Update are in areas subject to potential mudflows. In addition, the City of Pasadena requires new construction in hillside areas of the San Gabriel Mountains and San Rafael Hills to conduct hydrology studies to assess the impact of construction on downgradient developed areas. The assessment of possible impacts on LA County

storm drains and privately owned debris basins is also required. If the analyses indicate a potential hazard, improvements are required and fees to pay for the improvements may be assessed to the developers, as appropriate. Therefore, implementation of the General Plan Update would have a less than significant impact with respect to mudflows.

Implementation of the Housing Element Update would result in an increase in development; however, as noted above, the City of Pasadena is largely developed with a mixture of urban and suburban land uses. Potential pollutants could be generated by development associated with the General Plan Update. As described in the GP EIR, with issuance of the MS4 permit, the regulatory requirements have shifted from requiring a Standard Urban Stormwater Mitigation Plan (SUSMP) for new development and redevelopment projects to requiring compliance with the Los Angeles County's LID ordinance and submittal of a comprehensive LID Plan and analysis to demonstrate compliance with the LID Standards Manual. Applicants for future development within the General Plan Update area would be required to prepare an LID Plan for review and approval by the Director of Public Works that includes 1) feasibility of infiltration including a percolation report, 2) source control measures, 3) calculation of the Stormwater Quality Design Volume (SWQDV) which must be retained onsite, 4) discussion of the feasibility of stormwater runoff harvest and use, 5) stormwater quality control measures, and 6) proposed operation and maintenance plan. Future development within the City and specific-plan areas would also need to comply with other provisions of Chapter 8.70 of the City's Municipal Code, which prohibit the discharge of certain pollutants into the City's storm drain system, regulates illicit connections to the storm-drain system, requires implementation of permanent BMPs, and specifies requirements for natural watercourse protection. The RWQCB also requires industrial projects and land uses that generate stormwater or discharges that can directly affect water courses or water bodies to obtain individual WDRs and/or water quality certifications. Compliance with WDR conditions of approval and/or water quality certifications would prevent the violation of water-quality standards. Implementation of these programs and regulatory requirements would reduce stormwater pollutants that could affect water quality in the Arroyo Seco and/or Eaton Wash, thus reducing impacts related to stormwater pollution and water quality to less than significant levels.

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.



Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>XI. LAND USE AND PLANNING</b> <i>Would the project:</i>						
a) Physically divide an established community?	<b>LTS</b>	LTS (IS)	No	No	No	No
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?	<b>LTS</b>	LTS	No	No	No	No
c) Conflict with any applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP)?	<b>NI</b>	NI (IS)	No	No	No	No
<b>Discussion:</b>  As noted in the Initial Study, implementation of the General Plan Update would involve development of vacant land, intensification of existing land uses, and the introduction of new land uses on parcels throughout the City. Land use changes proposed within the Housing Element Update are intended to tie into the existing uses and surrounding neighborhoods. Development would occur within existing urban areas and infill sites, which is not expected to divide an established community, and this potential impact was considered less than significant.						

The GP EIR included an analysis of the General Plan Update's consistency with applicable state and regional laws, regulations, plans, and guidelines. The analysis concluded that with adherence to regulatory requirements and implementation of the General Plan Update policies, the potential conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be considered less than significant.

The Initial Study prepared for the GP EIR found that there are no adopted habitat conservation or natural community conservation plans within the City and, as such, concluded that no impacts to such plans would result from the General Plan Update.

The Housing Element Update identifies Inventory Sites throughout the city; these sites use the existing land use designations to accommodate new residential development; no General Plan land use changes are proposed with implementation of the Housing Element Update, and the project would not physically divide an established community. The Housing Element Update includes goals and policies to support housing development within the City. The Housing Element Update does not include any goals, policies, or programs that would conflict with adopted General Plan goals and policies adopted for the purpose of avoiding or mitigating an environmental effect. Furthermore, as previously discussed, implementation of the Housing Element Update would not exceed the development buildout identified and analyzed in the GP EIR. Therefore, implementation of the Housing Element Update would not result in significant land use and planning impacts.

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.

Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>XII. MINERAL RESOURCES</b> <i>Would the project:</i>						
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?	<b>NI</b>	NI (IS)	No	No	No	No
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?	<b>NI</b>	NI (IS)	No	No	No	No
<b>Discussion:</b>  As described in the Initial Study, no active mining operations exist in the City of Pasadena. There are two areas in Pasadena that may contain mineral resources; each area is designated a Mineral Resource Sector by the California Geological Survey. Eaton Wash (Sector F, 46 acres) was formerly mined for sand and gravel; Arroyo Seco Wash north of Devils Gate Reservoir (Sector H, 204 acres) was formerly mined for cement concrete aggregate. There are no active mines and no reserves in Sectors F or H. Aggregate reserves are aggregate deposits that have been determined to be acceptable for commercial use; are on land owned or leased by aggregate companies; and have permits allowing mining of aggregate material. Mineral resources—that is, all aggregate, including reserves—designated in Sectors F and H in 1984 were 4 million tons and 35 million tons, respectively. One closed sand and gravel mine is shown in Sector H, and no active or closed mines are shown in Sector F on the Mines Online map maintained by the California Office of Mine Reclamation (OMR 2013). Implementation of the General Plan Update or the Housing Element Update would not result in development within either sector and would have no impact on availability of mineral resources.						

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.

Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>XIII. NOISE</b>						
<i>Would the project result in:</i>						
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?	<b>LTS</b>	LTS	No	No	No	No
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<b>S-U</b>	S-U	No	No	No	No
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<b>LTS</b>	LTS	No	No	No	No

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<b>S-U</b>	S-U	No	No	No	No
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?	<b>NI</b>	NI (IS)	No	No	No	No
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?	<b>LTS</b>	LTS (IS)	No	No	No	No

**Discussion:**

The GP EIR analyzed impacts of noise from construction and operation of buildout of the General Plan Update, including stationary noise, traffic noise, rail noise, industrial noise, and all affiliated levels of vibration. With application of the noise regulations in Section 9.36 of the Municipal Code, compliance with existing Noise Element Policies, and the implementation of the proposed Land Use Element Policies, the GP EIR concluded noise impacts related to operational stationary sources would be less than significant.

The GP EIR noted that an increase in development could result in additional vehicle trips on local roadways in Pasadena. The majority of roadways and portions of the freeways through the City would experience either a decrease in noise level or a minimal increase in noise of less than 5 dB CNEL (from 0.1 to 2.5 dB CNEL for the arterials and 0.2 to 2.7 dB CNEL for the freeways), compared to existing conditions. The segment of Walnut Street east of Sierra Madre Boulevard is projected to increase by 4.1 dB CNEL, however this increase would still be below the 5 dB CNEL threshold. Additionally, the existing land uses along this segment consist primarily of commercial land uses such as a car dealership, auto repair, and auto paint and body businesses. Commercial uses are not considered noise-sensitive land uses. Therefore, traffic noise impacts are considered less than significant.

Noise-sensitive land uses such as single-family and mixed-use residential developments sited within the 60 dBA CNEL noise contour would be exposed to noise levels above the clearly acceptable level and would require a noise study through the development review process to determine the level of impacts and required mitigation. With implementation of General Plan Noise Element, Land Use

Element, and applicable state and local regulations, the GP EIR concluded transportation related noise impacts would be less than significant.

As described in the GP EIR, under the General Plan Update, mixed-use land uses would be permitted along the section of the Metro Gold Line that parallels Arroyo Parkway. In general, vibration levels generated from trains are dependent on specific site conditions such as geology and the condition of the railroad track and train wheels. Additionally, the use of heavy equipment associated with industrial operations can create elevated vibration levels in its immediate proximity. Under the General Plan Update, industrial uses could be sited near or adjacent to vibration-sensitive land uses. Implementation of GP EIR Mitigation Measures 9-1 and 9-2 would reduce groundborne vibration impacts to a less than significant level.

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity varies depending on soil type, ground strata, and receptor-building construction. Implementation of GP EIR Mitigation Measure 9-3 would minimize vibration impacts related to construction activities. However, due to the specific circumstances of future development projects, construction-related vibration annoyance impacts may still occur.

The GP EIR notes that in addition to annoyance, vibration generated from operation of construction equipment may also cause architectural damage. Future land use projects associated with the General Plan Update would likely occur at distances of 25 feet or less to existing vibration-sensitive receptors, possibly historic structures such as those in the Central District Specific Plan area. Vibration generated by construction equipment has the potential to be substantial and result in architectural damage to sensitive structures. Implementation of GP EIR Mitigation Measure 9-4 would minimize vibration-induced architectural impacts related to construction activities and ensure that vibration levels at sensitive receptors are below the FTA vibration-induced architectural damage significance criteria. Therefore, impacts would be reduced to less than significant.

Construction activities related to buildout of individual land uses associated with the General Plan Update could substantially elevate noise levels in the vicinity of noise-sensitive land uses. It is anticipated that the majority of future individual projects would not result in significant construction-related noise impacts with implementation of GP EIR Mitigation Measure 9-5 and adopted Noise Element Policies 7b, 7c, and 7d. These measures would contribute in minimizing construction-related noise. However, due to the unknown number of construction activities that could occur at one time, proximity of construction activities to sensitive receptors, and other factors that cannot be quantified at this time, such as the longevity of activities, construction-related noise impacts may not be reduced to less than significant levels for some projects. Therefore, the GP EIR concluded that construction related noise impacts are significant and unavoidable.

As described in the Initial Study, the nearest public use airport is El Monte Airport in the City of El Monte, which is four miles to the southeast and Bob Hope Airport in Burbank, 9.2 miles to the west. General Plan Update implementation would not cause any noise-

related impacts from aircraft operating to or from El Monte Airport or Bob Hope Airport. Therefore, the proposed project would not expose people to excessive airport related noise and would have no associated impacts.

There are two heliports in Pasadena and one immediately adjacent to the City. The General Plan Update would intensify development exposing more people to these noise sources. However, these heliports are private facilities not open for public use. Noise from helicopter flights would be periodic and is not expected to have a significant impact on the ambient noise environment. The Initial Study identified these impacts as less than significant.

Like buildout of the General Plan, development associated with implementation of the Housing Element Update could have potentially significant noise impacts due to construction-related noise and vibration, as the phasing and location of future projects are currently unknown. However, similar to the General Plan Update analyzed under the GP EIR, projects would be required to implement GP EIR Mitigation Measures 9-3 through 9-5 to ensure activity within the vicinity of sensitive land uses, receptors, and architectural structures is compliant with FTA vibration criteria and that BMPs are utilized throughout the construction phase of each future development project to avoid significant noise and vibration impacts to the extent feasible. Additionally, new projects located near rail lines would need to adhere to GP EIR Mitigation Measure 9-2, when applicable. As indicated in the Initial Study, there are no airports within two miles of the City and future residents associated with implementation of the Housing Element Update would not be exposed to excessive noise levels.

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur, nor would the significant unavoidable impacts identified in the GP EIR be worsened. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.

Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>XIV. POPULATION AND HOUSING</b> <i>Would the project:</i>						
a) Induce substantial unplanned 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)?	<b>LTS</b>	LTS	No	No	No	No
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<b>LTS</b>	LTS (IS)	No	No	No	No
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<b>LTS</b>	LTS (IS)	No	No	No	No
<b>Discussion:</b>  The GP EIR concluded that population, housing, and employment at buildout of the General Plan Update would exceed, but not substantially exceed, SCAG's growth forecasts for the City of Pasadena. Implementation of the General Plan Update would directly induce population growth in the area. However, the General Plan Update accommodates future growth in the City by providing for infrastructure and public services to accommodate this projected growth (see Chapter 5.7, Hydrology and Water Quality, Chapter 5.11, Public Services, Chapter 5.13, Transportation and Traffic, and Chapter 5.14, Utilities and Service Systems). Furthermore, population						



growth would be offset by employment growth accommodated by the General Plan Update, which would provide employment opportunities for new residents and create a slightly more balanced jobs-housing ratio for the region. Therefore, implementation of the General Plan Update would result in a less than significant impact relating to population growth

The proposed Housing Element Update is designed to guide and accommodate the City's share of the projected regional population growth and associated housing over the next eight years. The California Department of Housing and Community Development (HCD) is required to determine the Regional Housing Needs Allocation (RHNA), by income category, for Council of Governments (COGs) throughout the State. For the 2021-2029 planning period, the City of Pasadena's RHNA is 9,429 housing units. The Housing Element Update identifies adequate land and planning mechanisms to accommodate the future housing needs of the growing population derived directly from the population growth estimates for the region. Implementation of the Housing Element Update would result in a net increase in housing units within the City and is not anticipated to displace substantial numbers of housing or people; this potential impact would be considered less than significant.

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.

Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>XV. PUBLIC SERVICES</b> <i>Would 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:</i>						
a) Fire protection?	<b>LTS</b>	LTS	No	No	No	No
b) Police Protection?	<b>LTS</b>	LTS	No	No	No	No
c) Schools?	<b>LTS</b>	LTS	No	No	No	No
d) Libraries?	<b>LTS</b>	LTS	No	No	No	No
<b>Discussion:</b>  As described in the GP EIR, implementation of the General Plan Update would result in an increase in development within the City. Although fire protection services provided are currently adequate, additional Pasadena Fire Department (PFD) resources, including firefighter staffing, would be required to provide fire protection for new residents, workers, and structures. Public safety in Pasadena, including fire protection and emergency services provided by the PFD, is funded from the City's general fund. There is no direct fiscal mechanism that ensures that funding for fire and emergency services will grow exactly proportional to an increased need for services resulting from population growth in the City. However, revenue sources that contribute to the general fund, including property and sales taxes, would be expected to grow in rough proportion to any increase in residential dwelling units and/or nonresidential space in Pasadena. As the City's population increases, additional fire stations or expansions may be required. Various localized environmental impacts related to new construction or redevelopment of fire stations could occur. Any new or expanded fire stations that may be						

required to serve the City at General Plan buildout will be identified in the forthcoming Standards of Coverage document. The GP EIR concluded that the impact to fire services would be considered less than significant.

The increase in development within the City would add to the number of service calls received and to the number of police patrols and staff necessary to serve the City. Future growth in accordance with the General Plan Update is expected to create the typical range of calls for police service. To serve future growth, new and/or additional police resources would be needed to prevent a reduction in service ratios. The costs of additional personnel and materials are anticipated to be offset through the increased revenues and fees generated by future development. In addition, future projects would be reviewed by the City of Pasadena on an individual basis and would need to comply with any requirements in effect when the review is conducted, such as at the time of building permit issuance. The GP EIR concluded that police service impacts would be less than significant.

The addition of new housing units within the attendance boundaries of a school district has the potential to generate student growth in that district. This growth may put a strain on existing and/or planned school resources. As described in the GP EIR, Pasadena Unified School District (PUSD) has capacity to accommodate the student population estimated for Pasadena at buildout of the General Plan Update. If student growth generated by General Plan buildout exceeds the estimates identified in the GP EIR, modernization of an underutilized site could be needed. PUSD reserves its rights under law to negotiate schools impact fees with developers beyond the \$2.24 per square foot for residential units if the size, scope, and location of proposed residential developments warrant additional resources for building new or modernized school facilities. However, because estimated housing growth and student generation under the General Plan Update are based on realistic development capacity of proposed land uses designations in the City, a student population that exceeds these estimates is unlikely. The GP EIR concluded that impacts of the General Plan Update related to student generation and the potential need for additional school facilities would be less than significant.

As described in the General Plan EIR, implementation of the General Plan Update would result in an increase of 27,473 residents; the existing library system has adequate resources to serve this increase in population, and the addition of new library facilities would not be required. General Plan Land Use Policy 1.9 requires new development to provide public service and facilities through equitable fees and exactions. In addition, the City has enacted the Library Special Tax that levies a tax on residential and nonresidential land uses to maintain and improve the City's library. The GP EIR concluded the imposition of fees to improve the existing facilities and the fact that existing facilities would meet the needs of residents at General Plan buildout ensures that impacts would be less than significant.

New development associated with implementation of the Housing Element Update would be consistent with the development evaluated within the GP EIR, and would result in the incremental increase in need for fire protection, police, school and library services as the City's population grows and the number of residential units increases. The GP EIR noted that the increase in development would result in a less than significant impact to these services. Implementation of the Housing Element Update is not anticipated to increase demand for public services beyond the level analyzed in the GP EIR and would have a less than significant public services impact.

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.

Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>XVI. RECREATION</b> <i>Would the project:</i>						
a) Result in a substantial adverse physical impact associated with the provisions 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 parks?	<b>LTS</b>	LTS	No	No	No	No
b) Increase the use of existing neighborhood and regional parks or other recreational facilities such	<b>LTS</b>	LTS	No	No	No	No

that substantial physical deterioration of the facility would occur or be accelerated?						
c) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<b>LTS</b>	LTS	No	No	No	No
<p><b>Discussion:</b></p> <p>As described in the GP EIR, in order to ensure that there is no increase in impacts or deterioration to the existing parks and recreational facilities, new development is required to provide fees consistent with a nexus study, which is updated every five years. Fees may be used for capital improvements and interest on fees may be used for maintenance. The General Plan Land Use Diagram designates land for parks and open space, which includes parks and recreational facilities. Although a majority of this land is already developed for parks and open space, new recreational facilities or the expansion of existing facilities could be developed in these areas. Furthermore, consistent with the City's residential impact fee ordinance, new residential development in accordance with buildout of the General Plan Update would result in the construction of new or expanded recreational amenities. As described in the GP EIR, adoption of the General Plan Update would not result in significant adverse impacts related to provision of new or expanded recreational facilities.</p> <p>The RHNA allocation described in the Housing Element Update, and development of the number of units identified by the RHNA allocation (9,429 units), would be consistent with the amount of residential development analyzed within the GP EIR. This increase in residential development would likely result in an increase in the use of existing parks and recreation facilities. Similar to future development projects under the GP EIR, new development under the Housing Element Update would comply with the City's Municipal Code, Residential Impact Fees, and any other in-lieu and/or acquisition fees to ensure a less than significant impact to parks and recreation.</p> <p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>XVII. TRANSPORTATION/TRAFFIC</b> <i>Would the project:</i>						
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?	<b>LTS-M(GP)</b>	LTS-M	No	No	No	No
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?	<b>S-U</b>	S-U	No	No	No	No

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?	<b>NI</b>	NI (IS)	No	No	No	No
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<b>LTS</b>	LTS	No	No	No	No
e) Result in inadequate emergency access?	<b>LTS</b>	LTS	No	No	No	No
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?	<b>LTS-M(GP)</b>	LTS-M	No	No	No	No

**Discussion:**

The GP EIR analyzed the General Plan Updates for impacts to traffic and transportation based on calculations for vehicle miles traveled (VMT) per capita, vehicle trips (VT) per capita, proximity and quality of bicycle networks, proximity and quality of transit networks, and pedestrian accessibility, as well as compatibility with the City's Mobility Element. As described in the GP EIR, implementation of the General Plan Update would result in improved transportation conditions for all performance measures. This supports the Mobility Element's main policy objectives to enhance livability, encourage non-motorized and transit modes of travel, and create a climate for economic viability. In addition, the General Plan Update includes several policies that promote a diversity of land uses and promote the development of infrastructure improvements to support transit, bicycle and pedestrian travel. No significant adverse impacts would occur. All improvements within the City are funded through the City's transportation fee program with the exception of bicycle and pedestrian improvements. However, policies have been included in the General Plan Update to ensure adequate funding of the City's circulation network. Implementation of GP EIR Mitigation Measure 13-1 would ensure that citywide improvements are funded through the City's transportation impact fee program, thereby reducing impacts to a less than significant level.

The GP EIR found that buildout traffic conditions would result in designated road and/or highways exceeding county congestion management program thresholds, resulting in a significant impact. There are no feasible mitigation measures available to reduce impacts to CMP freeway segments and arterial intersections to below a level of significance. Improvements to freeway segments require an additional mainline travel lane, which either requires removal of a left hand shoulder resulting in substandard freeway

conditions or there is insufficient existing right-of-way. Increasing automobile capacity through roadway widening is also inconsistent with the General Plan's goals and policies.

The GP EIR found that under buildout, project circulation improvements would be designed to adequately address potentially hazardous conditions (sharp curves, etc.), potential conflicting uses, and emergency access. The Initial Study found that no portion of the City is located within an airport land use plan or within two miles of an airport. As such, the General Plan Update would not affect air traffic patterns and no impact would occur.

Consistent with the development analyzed within the GP EIR, implementation of the Housing Element Update would result in the future development of additional housing in the City and the anticipated growth would be within the limits identified in the GP EIR. Development projects associated with implementation of the Housing Element Update would be subject to whatever transportation impact fee is in effect at the time of permitting, per GP EIR Mitigation Measure 13-1.

As described in the GP EIR, under the General Plan Update, both VMT per capita and VT per capita are lower than under existing conditions. Under the General Plan Update, service population increases by 27 percent, while VMT and VT increase by only 25 percent and 19 percent, respectively. The resulting VMT per Capita is 22.1 and the VT per capita is 2.6, which is a reduction compared to existing conditions and is less than the thresholds.

The GP EIR identified a significant impact to CMP freeway segments or arterials intersections associated with implementation of the General Plan; as the implementation of the Housing Element would result in the development analyzed within the GP EIR, the significant impact would continue.

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur from the Housing Element Update, nor would the significant unavoidable impacts identified in the GP EIR be worsened. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.



Issues and Supporting Data Sources:	Housing Element Update Impact Conclusion	GP EIR Impact Conclusion	Does the Housing Element Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Housing Element Update?
<b>XVIII. UTILITIES AND SERVICE SYSTEMS</b> <i>Would the project:</i>						
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<b>LTS</b>	LTS	No	No	No	No
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?	<b>LTS</b>	LTS	No	No	No	No
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?	<b>LTS</b>	LTS	No	No	No	No
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<b>LTS</b>	LTS	No	No	No	No

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?	<b>LTS</b>	LTS	No	No	No	No
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<b>LTS</b>	LTS	No	No	No	No
g) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<b>NI</b>	NI (IS)	No	No	No	No

**Discussion:**

As described in the GP EIR, there is sufficient wastewater treatment capacity to accommodate the increase in wastewater demand citywide, and no major improvements are required. No new major sewer upgrades are anticipated or recommended for the General Plan Update land use changes. All new development in the City would be subject to sewer capacity considerations as part of the City approval process. Improvements and upgrades to sewer lines are prioritized based on need. Development fees are collected from each project and used to fund the highest priority improvements. Therefore, the GP EIR impacts related to wastewater were identified as less than significant.

As described in the GP EIR, impacts related to water supply would be less than significant because the projected water demand from the General Plan buildout is within the demands forecast in the 2010 UWMP, which demonstrates that supply meets the demand of the City. Furthermore, buildout would not result in any new or expanded water supplies or facilities beyond those planned and assumed in the 2010 UWMP. The GP EIR found that water supply impacts would be less than significant.

As described in the GP EIR, there is sufficient landfill capacity in the region for solid waste that would be generated by buildout in accordance with the General Plan Update. Impacts are less than significant. As described in the Initial Study, projects developed per the General Plan Update would be required to comply with laws and regulations governing solid waste, and no adverse impact would occur.

Implementation of the Housing Element Update would be consistent with the amount of residential development analyzed within the GP EIR. The Housing Element Update is not anticipated to exceed the capacity of existing utility facilities and no new or expanded

facilities are anticipated. Similar to the General Plan Update, residential development associated with implementation of the Housing Element Update would be required to adhere to all applicable solid waste regulations. Therefore, implementation of the Housing Element Update would have no impact related to compliance with solid waste regulations.

The current CEQA Guidelines Appendix G checklist also includes assessment criteria for potential impacts related to the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities. Similar to water, wastewater, and solid waste facilities, existing service providers would manage electricity, natural gas, and telecommunications services for projects developed as part of the implementation of the proposed Housing Element Update. As the City currently has utility services and is a developed urban and suburban community, significant relocation of utilities is not anticipated. Implementation of the Housing Element Update would result in less than significant impacts related to the relocation or construction of new or expanded electric power, natural gas, and telecommunications facilities.

No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.

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### ENVIRONMENTAL DETERMINATION

Based upon the evidence in light of the whole record documented in the attached environmental checklist explanation, cited incorporations and attachments, I find that the Project:

- ☐ **Has previously been analyzed** as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and City CEQA Guidelines. The proposed project is a component of the whole action analyzed in the previously adopted/certified CEQA document.
- ☒ **Has previously been analyzed** as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and City CEQA Guidelines. Changes and additions to the earlier CEQA document are needed to make the previous documentation adequate to cover the project which are documented in this Addendum (CEQA Guidelines §15164). However, none of the conditions described in CEQA Guidelines Section 15162 that would require the preparation of a subsequent EIR have occurred.
- ☐ **Has previously been analyzed** as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and City CEQA Guidelines. However, there is important new information and/or **substantial changes have occurred** requiring the preparation of an additional CEQA document (ND or EIR) pursuant to CEQA Guidelines Sections 15162 through 15163.



Prepared By \_\_\_\_\_ Date \_\_\_\_\_

Bob Prasse  
Printed Name



Reviewed By \_\_\_\_\_ Date \_\_\_\_\_

David Sanchez  
Printed Name

Addendum approved on: \_\_\_\_\_

Approval attested to by: \_\_\_\_\_  
Signature \_\_\_\_\_ Date \_\_\_\_\_

\_\_\_\_\_  
Printed Name

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## CHAPTER 4 MITIGATION MEASURES

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A listing of applicable mitigation measures from the Pasadena General Plan Final Environmental Impact Report is presented below. The mitigation measures listed are the same as the measures in the Final EIR and would be applicable to the proposed project. No new mitigation measures are required as a result of implementing the proposed project. The City, as the CEQA lead agency, is responsible for monitoring the implementation of the adopted mitigation measures.

### **Air Quality**

**2-1** Prior to issuance of any construction permits, development project applicants shall prepare and submit to the City of Pasadena Planning Division a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City of Pasadena Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Division. Mitigation measures to reduce construction-related emissions include, but are not limited to:

- Requiring fugitive-dust control measures that exceed SCAQMD's Rule 403, such as:
- Use of nontoxic soil stabilizers to reduce wind erosion.
- Applying water every four hours to active soil-disturbing activities.
- Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower.
- Ensuring that construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limiting nonessential idling of construction equipment to no more than five consecutive minutes.
- Using Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufacturers can be found on the SCAQMD's website at [http://www.aqmd.gov/prdas/brochures/Super-Compliant\\_AIM.pdf](http://www.aqmd.gov/prdas/brochures/Super-Compliant_AIM.pdf).

**2-2** Prior to future discretionary project approval, development project applicants shall prepare and submit to the City of Pasadena Planning Division a technical assessment evaluating potential project operation phase-related air quality impacts. The evaluation shall be prepared in conformance with SCAQMD methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City of Pasadena Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the Standard Conditions of Approval. Below are possible mitigation measures to reduce long-term emissions:

- For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions.
- Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.
- Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 California Code of Regulations Chapter 10 § 2485).
- Site-specific development shall demonstrate that an adequate number of electrical vehicle Level 2 charging stations are provided onsite. The location of the electrical outlets shall be specified on building plans, and proper installation shall be verified by the Building Division prior to issuance of a Certificate of Occupancy.
- Applicant-provided appliances shall be Energy Star appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star appliances shall be verified by the Building & Safety Division during plan check.
- Applicants for future development projects along existing and planned transit routes shall coordinate with the City of Pasadena, Metro, and Foothill Transit to ensure that bus pads and shelters are incorporated, as appropriate.

**2-3** Prior to future discretionary project approval, applicants for new industrial or warehousing land uses that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, or nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of Pasadena Planning Division. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the South Coast Air Quality Management District. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceeds the respective thresholds, as established by the SCAQMD at the time a project is considered, the applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs), including appropriate enforcement mechanisms, are capable of reducing potential cancer and noncancer risks to an acceptable level. T-BACTs may include, but are not limited to, restricting idling onsite or electrifying warehousing docks to reduce diesel



particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.

- 2-4** Prior to future discretionary approval, the City of Pasadena Planning Division shall evaluate new development proposals for sensitive land uses (e.g., residences, schools, and day care centers) within the City for potential incompatibilities with regard to the California Air Resources Board's Air Quality and Land Use Handbook: A Community Health Perspective (April 2005). In addition, applicants for siting or expanding sensitive land uses that are within the recommended buffer distances listed in Table 1-1 of the California Air Resources Board (CARB) Handbook shall submit a HRA to the City of Pasadena. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the SCAQMD. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceeds the respective thresholds, as established by the SCAQMD at the time a project is considered, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and noncancer risks to an acceptable level (i.e., below the aforementioned thresholds as established by the SCAQMD), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:

- Air intakes oriented away from high-volume roadways and/or truck loading zones.
- Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters.
- Heating, ventilation, and air conditioning systems for units that are installed with MERV filters shall maintain positive pressure within the building's filtered ventilation system to reduce infiltration of unfiltered outdoor air.

Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the City and shall be verified by the City's Planning Division. The intent of this mitigation measure is to reflect current CARB and SCAQMD Guidance/Standards as well as CEQA legislation and case law, and the City implementation of the measure shall adhere to current standards/law at the time such analyses are undertaken.

- 2-5** Prior to future discretionary approval, if it is determined that a project has the potential to emit nuisance odors beyond the property line, an odor management plan shall be prepared by the project applicant, subject to review and approval by the Planning & Community Development Director or their designee. Facilities that have the potential to generate nuisance odors include but are not limited to:

- Wastewater treatment plants
- Composting, green waste, or recycling facilities
- Fiberglass manufacturing facilities
- Painting/coating operations

- Large-capacity coffee roasters
- Food-processing facilities

The odor management plan shall show compliance with the South Coast Air Quality Management District's Rule 402 for nuisance odors. The Odor Management Plan shall identify the T-BACTs that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include but are not limited to scrubbers (i.e., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.

### **Biological Resources**

- 3-1** The City of Pasadena shall require applicants of future development projects that disturb undeveloped land in the San Rafael Hills and tract of land at the northwest intersection of Crestford Drive and Florecita Drive, shown on Figure 5.3-2, to prepare a biological resources survey. The survey shall be conducted by a qualified biologist and shall be a reconnaissance level field survey of the project site for the presence and quality of biological resources potentially affected by project development. These resources include, but are not limited to, special status species or their habitat, sensitive habitats such as wetlands or riparian areas, and jurisdictional waters. If sensitive or protected biological resources are absent from the project site and adjacent lands potentially affected by the project, the biologist shall submit a written report substantiating such to the City of Pasadena before issuance of a grading permit by the City, and the project may proceed without any further biological investigation. If sensitive or protected biological resources are present on the project site or may be potentially affected by the project, implementation of Mitigation Measure 3-2 shall be required.
- 3-2** A qualified biologist shall evaluate impacts to sensitive or protected biological resources from development. The impact assessment may require focused surveys that determine absence or presence and distribution of biological resources on the site. These surveys may include, but are not limited to: 1) focused special status animal surveys if suitable habitat is present; 2) appropriately timed focused special status plant surveys that will maximize detection and accurate identification of target plant species; and 3) a delineation of jurisdictional boundaries around potential wetlands, riparian habitat, and waters of the United States or State. The results of these surveys will assist in assessing actual project impacts, and with the development of project-specific mitigation measures. Alternatively, the project applicant may forgo focused plant and animal surveys and assume presence of special status species in all suitable habitats on the project site. The qualified biologist shall substantiate the impact evaluation or the assumed presence of special-status species in all suitable habitats onsite in a written report submitted to the City of Pasadena before issuance of a grading permit by the City.
- 3-3** The City of Pasadena shall require applicants of development project to avoid potential impacts to sensitive or protected biological resources to the greatest extent feasible. Depending on the resources potentially present on the project site, avoidance may include: 1) establishing appropriate no-disturbance buffers around onsite or adjacent resources, and/or 2) initiating construction at a time when special status or protected

- animal species will not be vulnerable to project-related mortality (e.g., outside the avian nesting season or bat maternal or wintering roosting season). Consultation with relevant regulatory agencies may be required in order to establish suitable buffer areas. If the project avoids all sensitive or protected biological resources, no further action is required. If avoidance of all significant impacts to sensitive or protected biological resources is not feasible, the project shall implement Mitigation Measure 3-4.
- 3-4** The City of Pasadena shall require applicants to design development projects to minimize potential impacts to sensitive or protected biological resources to the greatest extent feasible, in consultation with a qualified biologist and/or appropriate regulatory agency staff. Minimization measures may include 1) exclusion and/or silt fencing, 2) relocation of impacted resources, 3) construction monitoring by a qualified biologist, and 4) an informative training program conducted by a qualified biologist for construction personnel on sensitive biological resources that may be impacted by project construction. If minimization of all significant impacts to sensitive or protected biological resources is infeasible, the project shall implement Mitigation Measure 3-5.
- 3-5** A qualified biologist will develop appropriate mitigations that will reduce project impacts to sensitive or protected biological resources to a less than significant level, if feasible. The type and amount of mitigation will depend on the resources impacted, the extent of the impacts, and the quality of habitats to be impacted. Mitigations may include, but are not limited to: 1) compensation for lost habitat or waters in the form of preservation or creation of in-kind habitat or waters, either onsite or offsite, protected by conservation easement; 2) purchase of appropriate credits from an approved mitigation bank servicing the Pasadena area; and 3) payment of in-lieu fees.
- 3-6** Applicants of projects developed pursuant to the General Plan Update shall obtain appropriate permit authorization(s) for impacts to jurisdictional waters, wetlands, and/or riparian habitats. The types of permits potentially required for impacts to jurisdictional waters are a Clean Water Act (Section 404) permit issued by the US Army Corps of Engineers, a California Water Certificate or Waste Discharge Order issued by the Regional Water Quality Control Board, and a Stream Alteration Agreement issued by the California Department of Fish and Wildlife.

### **Cultural Resources**

- 4-1** If cultural resources are discovered during construction of land development projects in Pasadena that may be eligible for listing in the California Register for Historic Resources, all ground disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report including site record to the City and the South Central Coastal Information Center at California State University Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report.
- 4-2** The City shall require applicants for development permits that involve grading in areas within the paleontologically sensitive Topanga formation (see Figure 5.4-2 of the Draft

EIR) to provide studies by a qualified paleontologist assessing the sensitivity of the project for buried paleontological resources. On properties determined to be moderately to highly sensitive for paleontological resources, such studies shall provide a detailed mitigation plan, including a monitoring program and recovery and/or in situ preservation plan, based on the recommendations of a qualified paleontologist. The mitigation plan shall include the following requirements:

- A paleontologist shall be retained for the project and will be on call during grading and other significant ground-disturbing activities more than six feet below the ground surface.
- Should any potentially significant fossil resources be discovered, no further grading shall occur in the area of the discovery until the Planning and Community Development Director concurs in writing that adequate provisions are in place to protect any significant resources. Work may continue outside a minimum radius of 25 feet from the discovery pending review by the Director.
- Unanticipated discoveries shall be evaluated for significance by a qualified paleontologist. If evaluation determines that significance criteria are met, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report, including catalog with museum numbers.

### **Greenhouse Gas Emissions**

- 5-1** Within approximately 18 months of adoption of the proposed General Plan Update, the City of Pasadena shall prepare and present to the City Council for adoption a community climate action plan/greenhouse gas reduction plan. The Plan shall identify strategies to be implemented to reduce GHG emissions associated with the City and shall include as one alternative a program that achieves the AB 32 targets. In addition, the City shall monitor GHG emissions by updating its community-wide GHG emissions inventory every five years upon adoption of the initial Plan. Upon the next update to the community climate action plan/greenhouse gas reduction plan, the inventory, GHG reduction measures, and GHG reductions shall be forecast to year 2035 to ensure progress toward achieving the interim target that aligns with the long-term GHG reduction goals of Executive Order S-03-04. The Plan update shall take into account the reductions achievable from federal and state actions and measures as well as ongoing work by the City and the private sector. The 2035 Plan update shall be completed by January 1, 2021, with a plan to achieve GHG reductions for 2035 or 2040, provided the state has an actual plan to achieve reductions for 2035 or 2040. New reduction programs in similar sectors as the proposed Plan (building energy, transportation, waste, water, wastewater, agriculture, and others) will likely be necessary. Future targets shall be considered in alignment with state reduction targets, to the maximum extent feasible, but it is premature at this time to determine whether or not such targets can be feasibly met through the combination of federal, state, and local action given technical, logistical and financial constraints. Future updates to the community climate action plan/greenhouse gas reduction plan shall account for the horizon beyond 2035 as the state adopts actual plans to meet post-2035 targets. In all instances, the community climate action plan/greenhouse gas reduction plan and any updates shall be consistent with state and federal law.

## **Noise**

- 9-1** Prior to issuance of building and occupancy permits, applicants of industrial projects that involve vibration-intensive machinery or activities adjacent to sensitive receptors shall prepare a study to evaluate potential vibration impacts. The study shall be prepared by an acoustical engineer and be submitted to the City of Pasadena Planning Division. The study shall evaluate the vibration levels associated with operation of project-related equipment and activities experienced by nearby sensitive receptors. If it is determined that vibration impacts to nearby receptors exceed the Federal Transit Administration (FTA) vibration-annoyance criterion, the study shall recommend, and the applicant shall implement the identified measures with the purpose of reducing vibration impacts to a less than significant level. The City of Pasadena shall verify implementation of all identified measures.
- 9-2** Prior to issuance of building permits for the new construction of habitable area, applicants for development projects shall adhere to the appropriate Vibration Category 2 and Vibration Category 3 screening distances for light rail transit as recommended in Table 9-2 of FTA's Transit Noise and Vibration Impact Assessment (FTA 2006) in evaluating vibration impacts related to trains on the Metro Gold Line. Applicants for development projects that fall within the screening distances shall prepare and submit to the City of Pasadena Planning Division a study evaluating vibration impacts to the proposed development from train operations. The study shall be prepared by an acoustical engineer who shall identify measures to reduce impacts to habitable structures to below the FTA vibration annoyance criterion. The identified measures shall be incorporated into all design plans submitted to the City of Pasadena.
- 9-3** Prior to issuance of any grading and construction permits, applicants for individual projects that involve vibration-intensive construction activities, such as pile drivers, jack hammers, and vibratory rollers, within 25 feet of sensitive receptors (e.g., residences and historic structures) shall prepare and submit to the City of Pasadena Planning Division a study to evaluate potential construction-related vibration impacts. The study shall be prepared by an acoustical engineer and shall identify measures to reduce impacts to habitable structures to below the FTA vibration annoyance criterion. If construction-related vibration is determined to be perceptible at vibration-sensitive uses, additional requirements, such as use of less-vibration-intensive equipment or construction technique, shall be implemented during construction (e.g., drilled piles, static rollers, and nonexplosive rock blasting). Identified measures shall be included on all construction and building documents and submitted for verification to the City of Pasadena Planning Division.
- 9-4** Prior to issuance of any construction permits, applicants for individual projects that involve vibration-intensive construction activities, such as pile drivers, jack hammers, bulldozers, and vibratory rollers, within 25 feet of sensitive receptors (e.g., residences) or 50 feet of historic structures, shall prepare and submit to the City of Pasadena Planning Division a study to evaluate potential construction-related vibration impacts. The vibration assessment shall be prepared by an acoustical engineer and be based on the FTA vibration-induced architectural damage criterion. If the study determines a potential exceedance of the FTA thresholds, measures shall be identified that ensure vibration levels are reduced to below the thresholds. Measures to reduce vibration levels can include use of less-vibration-intensive equipment (e.g., drilled piles and static rollers) and/or construction techniques (e.g., nonexplosive rock blasting and use

of hand tools) and preparation of a preconstruction survey report to assess the condition of the affected sensitive structure. Notwithstanding the above, pile drivers shall not be allowed within 150 feet of any historic structures. Identified measures shall be included on all construction and building documents and submitted for verification to the City of Pasadena Planning Division.

**9-5** Prior to issuance of construction permits, applicants for new development projects within 500 feet of noise-sensitive receptors shall implement the following best management practices to reduce construction noise levels:

- Consider the installation of temporary sound barriers for construction activities immediately adjacent to occupied noise-sensitive structures.
- Equip construction equipment with mufflers.
- Restrict haul routes and construction-related traffic.
- Reduce nonessential idling of construction equipment to no more than five minutes.

The identified best management practices shall be noted on all site plans and/or construction management plans and submitted for verification to the City of Pasadena Planning Division.

### **Transportation and Traffic**

**13-1** The City of Pasadena shall update its existing transportation impact fee program by 2020. The City shall prepare a “Nexus” Study that will serve as the basis for requiring development impact fees under AB 1600 legislation, as codified by California Code Government Section 66000 et seq. The established procedures under AB 1600 require that a “reasonable relationship” or nexus exist between the traffic improvements and facilities required to mitigate the traffic impacts of new development pursuant to the proposed project. After approval of the Nexus Study, the City shall update the transportation impact fee program to fund all citywide circulation improvements, including the pedestrian and bicycle network. The fee program shall stipulate that fees are assessed when there is new construction or when there is an increase in square footage within an existing building or the conversion of existing square footage to a more intensive use. Fees are calculated by multiplying the proposed square footage or dwelling unit by the rate identified. The fees are included with any other applicable fees payable at the time the building permit is issued. The City will use the development fees to fund construction (or to recoup fees advanced to fund construction).

## **CHAPTER 5 LIST OF PREPARERS**

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