ATTACHMENT D PLANNING COMMISSION STAFF REPORT (4/27/22)



STAFF REPORT

DATE: APRIL 27, 2022

TO: PLANNING COMMISSION

FROM: DAVID M. REYES, DIRECTOR OF PLANNING & COMMUNITY DEVELOPMENT

DEPARTMENT

SUBJECT: ZONING CODE AMENDMENT: RELIGIOUS FACILITIES WITH AFFORDABLE

HOUSING

RECOMMENDATION:

It is recommended that the Planning Commission:

- 1. Recommend that the City Council find that the Addendum to the 2015 Pasadena General Plan Environmental Impact Report (State Clearinghouse No. 2013091009) to address the potential site-specific environmental impacts associated with the proposed amendment has been 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, Sections 15162 and 15164). The addendum found that the proposed amendment will not result in any potentially significant impacts that were not already analyzed.
- 2. **Recommend** that the City Council adopt the Findings for the Zoning Code Amendment in Attachment A; and,
- 3. **Recommend** that the City Council approve the Zoning Code Amendment as outlined in this report.

BACKGROUND:

Recent efforts by churches and other faith-based organizations have prompted discussion of allowing affordable housing opportunities on sites owned by religious and faith-based institutions. The City initiated a Zoning Code Amendment to define regulations related to housing on these properties and conducted outreach in the form of a Planning Commission Study Session (July 2020), City Council Study Session (October 2020), Virtual Community Workshop (December 2020), and follow-up study sessions with the Planning Commission (January and March 2022). The focus of this report is to review comments received, provide recommendations, and receive

a recommendation on the regulations to be presented to the City Council for adoption.

March 23, 2022 – Planning Commission Study Session

Staff provided an overview of comments received to date, discussed potential development standards developed by staff and the public, and received comments from commissioners and the public. The commissioners provided the following comments:

- Discussion regarding which types of institutional uses (beyond religious facilities and colleges) could/should qualify for residential development;
- Concern regarding the amount of affordable units that could be developed when factoring in density bonus law;
- Desire to achieve developments with 100% affordable units
- Support for adaptive reuse/partial conversion of existing religious facilities into affordable residential units;
- Support for allowing up to 75 units by-right;
- Support for ensuring that historic resources are maintained; and
- Mixed opinion on starting with housing associated with religious facilities as a pilot effort, expanding to institutional uses in the future

Public comment included the following topics:

- Concern regarding the preservation of historic churches;
- Support for allowing housing at colleges, provided that such institutions are located near convenient transportation options; and
- General support for allowing housing on land owned by religious and other institutions such as colleges and hospitals to provide a greater diversity of affordable housing options and promote homeownership options to marginalized ethnic, racial, and socioeconomic communities

Additional background information is provided in the March 23, 2022 staff report (Attachment B).

DISCUSSION:

Existing Affordable Housing Regulations

Chapter 17.42 of the Zoning Code provides Inclusionary Housing Requirements that obligate proposed residential developments of 10 or more units to include on-site or off-site affordable housing units, or to provide land donations or pay in-lieu fees, as part of an overall strategy to ensure that the addition of affordable housing units are included as part of new housing projects. Projects that include for-sale units must specify a minimum of 20 percent of the total number of units to be sold to very low, low, or moderate income households. Projects with rental units must dedicate a minimum of five percent of units for very-low income households, five percent to very-low or low income households, and 10 percent of units to very-low, low, or moderate income households.

Applicants may request a density bonus, as set forth in California Government Code Section 65915, for projects with five or more dwelling units. In exchange, an applicant must agree to dedicate at least one of the following:

Five percent of units dedicated to very-low income households;

- 10 percent of units dedicated to low-income and very-low income households;
- 10 percent of units dedicated to moderate-income households and available to the general public for sale; or
- At least 35 percent of units available exclusively to persons aged 55 and older and those residing with them.

Projects providing greater than the minimum affordability requirement may receive up to a 50 percent density bonus. Housing projects consisting of 100 percent affordable units for lower income households may receive up to an 80 percent density bonus, or no maximum limit if the project is 100% affordable to lower income households and is within one-half mile of a major transit stop. In order to take advantage of this "super density bonus", all units, including Density Bonus units are required to be affordable. Projects not utilizing the "super density bonus" cannot be required to make density bonus units affordable.

Existing Land Use Restrictions

Articles 2 and 3 in the Zoning Code set forth allowable land uses for zoning districts and identifies where Religious Facilities (land use) and multi-family housing are permitted, prohibited or conditionally permitted. Several zoning districts currently allow for both Religious Facilities (land use) and multi-family housing by-right. These include the CD-1, CD-2, CD-3, CD-4, EPSP-d1-CG, EPSP-d1-CL, EPSP-d1-CO, FGSP-C-3d and FGSP-CL-1b zoning districts.

Some zoning districts require approval of a Conditional Use Permit (CUP) for multi-family housing on a site with a Religious Facility, or do not permit housing. These include the Commercial General (CG), Commercial Limited (CL), Commercial Office (CO), Public/Semi-Public (PS) zones, as well as various commercial-centric sub-areas of the Central District, North Lake, East Colorado, East Pasadena, Fair Oaks/Orange Grove and Lincoln Avenue Specific Plans.

Additionally, some zones allow both Religious Facilities and multi-family housing, but require compliance with the City of Gardens development standards (Sections 17.22.060 through 17.22.080) for the multi-family component of a project. The City of Gardens standards are intended to produce multi-family housing projects primarily designed around a main garden area, which may significantly limit the development of housing specifically in conjunction with an existing Religious Facility use.

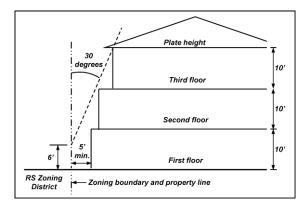
As a result, existing religious facilities that may be desirable sites for new affordable housing may currently be precluded from developing housing due to existing zoning restrictions. To address this, the proposed ordinance would include a new land use category, "Religious Facilities with Affordable Housing (land use)", and permit the land use by right in a wide range of zoning districts. See Attachment E for the full list of zoning districts addressed by the proposed amendment.

Proposed Amendments

Staff has developed regulations to allow affordable housing on sites owned and operated by religious facilities in zones that either do not currently allow housing by-right, or which allow housing only as an accessory use. The proposed amendment recommends allowing this type of housing in a wider range of zones, provided that such housing includes on-site affordable units. The following section summarizes the proposed amendments and development standards that have been refined through input from both the public and Planning Commission:

- Existing Use: Property must be owned by the religious facility and operated as a religious
 assembly use. The primary use as a religious facility would need to be present at the time
 of the construction of the multi-family dwelling units utilizing the proposed Zoning Code
 Amendments.
- Residential Density: Projects would be eligible for a maximum density of 32 dwelling units per acre and a maximum number of 75 dwelling units by right. To exceed 75 dwelling units per site, a Minor Conditional Use Permit (MCUP) would be required.
- Development Standards. Utilize the development standards (setbacks, FAR, etc.) of the
 underlying zoning district in conjunction with the community space requirements of the
 Mixed-Use Development Standards. In the PS zoning district where standards are set by
 CUP, the development standards of the least restrictive abutting zoning district would be
 used.
- Parking. Pursuant to AB 1851, through the construction of a Religious Facility with Affordable Housing, up to 50 percent of the required number of spaces for the existing, or proposed, religious facility can be eliminated, or reduced in the case of a plan for a new development. The remaining parking spaces can be shared between the Religious Facility and the proposed housing. The reduction in parking spaces would not reduce the minimum parking standards for the housing component to less than one space per unit unless within proximity to public transit or a car share vehicle.
- **Adaptive Reuse.** Existing buildings on a Religious Facility site may be converted to residential units without requiring the provision of additional open space.
- Affordability. Require a percentage of the units to be affordable, in the following manner:
 - For Sale projects:
 - A minimum of 80 percent of the total number of units in the project must be sold to moderate-income households, or
 - A minimum of 50 percent of the units must be sold to low-income households and 30 percent of the units would be sold to households earning up to 150 percent AMI
 - Rental projects
 - A minimum of 80 percent of the units must be rented to low-income households.

• **Encroachment Plane.** Additionally, in PS zones, the encroachment plane below would apply to any property line shared with properties zoned RS and RM-12 and would utilize the underlying zoning district setback requirements or that of the least restrictive abutting zoning district.



- Existing Use Permits. When a site has an existing Use Permit (CUP, MCUP, etc.):
 - Religious Housing developments will not require any modifications to existing Use Permits
 - Operational conditions related to non-residential uses would remain in effect. Such conditions may include hours of operation, occupancy limits, types of uses, and seats
 - Development standards for "religious facilities with affordable housing" will supersede conditions of approval regulating development standards. Such standards include FAR, Parking, Height, Setbacks, Open Space

ENVIRONMENTAL DETERMINATION:

An Initial Study and EIR was prepared for the Pasadena General Plan in compliance with the California Environmental Quality Act (CEQA) and certified by the City Council on August 17, 2015. An addendum to the IS/EIR has been prepared analyzing the Zoning Code Amendment to allow for Affordable Housing on Sites with a Religious Facility in compliance with Section 15164 (Addendum to an EIR or Negative Declaration) of the CEQA guidelines (Title 14, Chapter 3, Article 11). The addendum found that the project revisions will not result in any potentially significant impacts that were not already analyzed in the IS/EIR.

Addendum to Certified EIR

The original Project evaluated in the Certified EIR (State Clearinghouse No. 2013091009) analyzed potential citywide impacts, broad policy alternatives, and programmatic mitigation measures associated with the General Plan Update. The certified EIR analyzed the update of the General Plan and specific plan amendments.

The City is proposing updates to the Zoning Code previously analyzed in the EIR. Updates to the Zoning Code primarily focus on refining and/or establishing objective development standards to achieve the goals and vision of the General Plan. The revised project includes updates to the following components of the Zoning Code to bring it into alignment with the General Plan: types of use; policies; design standards, density and intensity of development; height and/or overall scale of buildings and structures; setbacks; parking requirements; and open space requirements. The Addendum was prepared pursuant to CEQA Guidelines § 15164(a) which allows a lead

agency to prepare an addendum to a previously certified EIR if only minor technical changes or additions to the previously certified EIR are necessary but none of the conditions described in CEQA Guidelines § 15162 requiring preparation of a subsequent EIR are present. The analysis demonstrates that the proposed modifications evaluated in the Addendum would not result in conditions meeting the criteria set forth in CEQA Guidelines § 15162. Therefore, pursuant to PRC § 21166 and CEQA Guidelines § 15162, preparation of a subsequent EIR is not required. Refer to Attachment F for the Addendum to the General Plan EIR.

CONCLUSION:

Staff is seeking a recommendation from the Planning Commission on the proposed Zoning Code Text Amendment. Staff recommends that the Planning Commission recommend that the City Council make the required findings and adopt the Zoning Code Amendment.

Respectfully submitted,

DAVID'M. REYES

Director of Planning & Community Development Department

Reviewed by:

Martin Potter

Reviewed by:

Planner

David Sanchez Principal Planner

Prepared by:

Jennifer Driver

Planner

Attachments:

Attachment A – Required Findings

Attachment B – Planning Commission Study Session Staff Report (March 23, 2022)

Attachment C – PMC Chapter 17.42 (Inclusionary Housing Requirements)

Attachment D – PMC Section 17.50.160 (Mixed-Use Development Standards)

Attachment E – Included Zoning Districts

Attachment F – Addendum to 2015 General Plan Environmental Impact Report

ATTACHMENT A REQUIRED FINDINGS

ATTACHMENT A

FINDINGS FOR ZONING CODE TEXT AMENDMENT

Prior to the approval of a Zoning Code Text Amendment, the following findings must be made:

1. The proposed amendment is in conformance with the goals, policies and objectives of the General Plan, and other adopted goals and policies of the City.

The proposed amendment to the Zoning Code is consistent with the goals and policies of the General Plan as follows:

Land Use Element

- Goal 2. Land Use Diversity. A mix of land uses meeting the diverse needs of Pasadena's residents and businesses, fostering improved housing conditions, offering a variety of employment and recreation opportunities, and supporting a healthy population while protecting the environment.
 - O Policy 2.1 (Housing Choices). Provide opportunities for a full range of housing types, densities, locations, and affordability levels to address the community's fair share of regional, senior, and workforce housing needs and provide a strong customer base sustaining the economic vitality of Pasadena's commercial land uses. The types, densities, and location of housing shall be determined by the Land Use Diagram and reflect the projected needs specified in the Housing Element.
- Goal 4. Elements Contributing to Urban Form. A safe, well-designed, accessible
 City with a diversity of uses and forms. These diverse forms include distinct,
 walkable districts, corridors, and transit and neighborhood villages and cohesive,
 unique single and multi-family residential neighborhoods and open spaces where
 people of all ages can live, work, shop, and recreate.
 - O Policy 4.11 (Development that is Compatible). Require that development demonstrates a contextual relationship with neighboring structures and sites addressing such elements as building scale, massing, orientation, setbacks, buffering, the arrangement of shared and private open spaces, visibility, privacy, automobile and truck access, impacts of noise and lighting, landscape quality, infrastructure, and aesthetics.
- Goal 7. Architectural Design and Quality. Encourage an architecturally distinguished city with a diversity of building styles. New development will recognize this by supporting a variety of materials, forms, and construction techniques while demonstrating contextual relationship to its surroundings through

traditional physical concepts (orientation, scale, materials) and non-physical concepts (cultural, climactic, economic).

- Policy 7.1 (Compatibility). Require that new and adaptively re-used buildings are designed to respect and complement the defining built form, massing, scale, modulation, and architectural detailing of their contextual settings.
- Goal 20. Information and Participation. All Pasadena communities will be uniformly aware and participate in land use planning, entitlement processes, and decisionmaking processes through the communication of clear and understandable information and engagement opportunities.
 - Policy 20.3 (Public Involvement and Proposed Projects). Improve neighborhood participation in current planning and land use decisions by affording adequate opportunity to review and comment on plans, programs, activities and reports covering the City's land use projects.
- Goal 21. Desirable Neighborhoods. A City composed of neighborhoods with a variety of housing types that are desirable places to live, contribute to the quality of life, and are well maintained.
 - O Policy 21.1 (Adequate and Affordable Housing). Provide a variety of housing types (i.e. small subdivisions, row housing, and condominiums), styles, densities, and affordability levels that are accessible to and meet preferences for different neighborhood types (e.g. mixed use pedestrian environments and traditional suburban neighborhoods), physical abilities and income levels, pursuant to the Housing Element.
 - Policy 21.2 (Equitable Distribution of Affordable Housing). Providing for the equitable distribution of affordable housing throughout the City, as defined by the Housing Element goals and policies, capitalizing on opportunities for new development allowed by the densities permitted in the Central District and Transit Villages.
 - Policy 21.4 (New Residential Development). Attract new residential development that is well-conceived, constructed, and maintained in a variety of types, densities, locations and costs.

Housing Element

 Goal HE-1. Sustainable neighborhoods of quality housing, parks and community services, infrastructure, and other associated services that maintain and enhance neighborhood quality, character, and the health of residents.

- Policy HE-1.1 (Neighborhood Character). Encourage, foster, and protect a balanced mix, density, and form of residential and mixed-use districts and neighborhoods. Preserve the character, scale, and quality of established residential neighborhoods.
- Policy HE-1.4 (Neighborhood Involvement). Encourage residents and neighborhood organizations to be proactive in identifying and addressing housing and neighborhood needs and seeking solutions in partnership with the City.
- Goal HE-2. An adequate supply and diversity of quality rental and ownership housing opportunities suited to residents of varying lifestyle needs and income levels.
 - Policy HE-2.1 (Housing Diversity). Facilitate and encourage diversity in types, prices, ownership, and size of single-family homes, apartments, town homes, mixed-uses, transit-oriented developments, and work/live housing, among others.
 - Policy HE-2.4 (Affordable Housing). Facilitate a mix of household income and affordability levels in residential projects and the appropriate dispersal of such units to achieve greater integration of affordable housing throughout the City.
 - Policy HE-2.5 (Adaptive Reuse). Support innovative strategies for the adaptive reuse of residential, commercial, and industrial structures to provide for a wide range of housing types and residential uses that respect the historic integrity of the structure.
 - Policy HE-2.6 (Housing Incentives). 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 (Entitlement Process). Explore continued improvements to the entitlement process to streamline and improve coordination of the processing of development permits, design review, and funding of affordable housing.
 - Policy HE-2.8 (Community Involvement). Continue and support dialogue with builders, advocates, nonprofits, residents, finance industry, and other stakeholders in addressing the housing needs of residents and workforce in Pasadena.

- Goal HE-3. Expand, protect, and preserve opportunities for households to find and retain housing in Pasadena and afford a greater choice of rental and homeownership opportunities.
 - Policy HE-3.2: Partnerships. Support collaborative partnerships with nonprofit organizations, faith-based organizations, developers, business community, and state and federal agencies to develop, rehabilitate, preserve, and retain affordable housing.

The proposed amendments were developed through discussion with members of the public and religious facilities that identified a need for additional housing options as well as possible solutions for consideration. Through dialogue at publicly-noticed study sessions and hearings, development of the proposed amendments took these concerns and solutions into account, consistent with Housing Element Policies HE-1.4 and HE-2.8. The proposed amendments include changes to the Zoning Code in order to facilitate the construction of multi-family affordable housing on underutilized sites with existing or proposed religious facilities. This increases housing choices and creates opportunities for the production of more affordable housing, consistent with Land Use Policies 2.1, 21.1, 21.2 and 21.4, as well as Housing Element Policy HE-2.1, HE-2.4 and HE-3.2. The amendments will establish a permitting process that allows for a ministerial review process for housing projects that are under certain thresholds and a discretionary review process for projects exceeding certain thresholds in order to allow public participation in the review of projects that propose changes significant enough that they may result in potential impacts. The process would also provide an avenue for projects to obtain waivers from development standards that will otherwise make the construction of housing infeasible. This is consistent with Land Use Policies 20.3 and Housing Element Policies HE-2.6 and HE-2.7. The amendments will set forth minimum development standards for new construction and will also allow for adaptive reuse of underutilized existing structures into a much needed housing resource for the City's vulnerable populations. These aspects of the amendments are consistent with Land Use Policies 4.11, 7.1 and 16.6, as well as Housing Element Policies HE-1.1 and HE-2.5.

2. The proposed amendment would not be detrimental to the public interest, health, safety, convenience, or general welfare of the City.

The proposed amendments are consistent with numerous policies in the Land Use and Housing Elements of the General Plan. They will provide greater opportunity to provide affordable housing in Pasadena by incentivizing the construction of affordable multi-family housing on underutilized properties with religious facilities. The amendments will establish a process that allows for a ministerial review process for projects that are under certain thresholds and a discretionary review process for projects exceeding certain thresholds in order to allow public participation in the review of projects that propose changes significant enough that they may result in potential impacts and that would otherwise contain provisions outlined in the staff report. For

these reasons, the amendments will not be detrimental to the public i safety, convenience, or general welfare of the City.	nterest, health,
ing Code Toyt Amendment:	

ATTACHMENT B PLANNING COMMISSION STUDY SESSION STAFF REPORT (MARCH 23, 2022)



STAFF REPORT

DATE: MARCH 23, 2022

TO: PLANNING COMMISSION

FROM: DAVID M. REYES, DIRECTOR OF PLANNING & COMMUNITY

DEVELOPMENT DEPARTMENT

SUBJECT: STUDY SESSION TO ALLOW HOUSING ON INSTITUTIONAL FACILITIES

SITES

RECOMMENDATION:

This is an informational item only; there is no action required. The following report summarizes the City's outreach efforts and potential changes to existing development standards related to residential uses on underutilized parcels owned by religious facilities and other institutions.

BACKGROUND:

Recent efforts by churches and other faith-based organizations have prompted discussion of allowing affordable housing on sites owned by religious and faith-based institutions. The City has initiated a Zoning Code Amendment to define regulations related to allowing housing on these properties and conducted outreach in the form of a Planning Commission Study Session (July 2020), City Council Study Session (October 2020), Virtual Community Workshop (December 2020), and second Planning Commission Study Session (January 2022). The focus of this report is to review comments received, provide recommendations, and receive further input from the Commission and public. Staff will return to the Planning Commission for a recommendation on the regulations that would be presented to the City Council for adoption.

<u>January 2022 – Planning Commission Study Session</u>

Staff provided an overview of comments received to date, discussed potential development standards developed by staff and the public, received comments from commissioners and the public, and received feedback from the Commission on issues ranging from whether institutional uses should qualify for residential development to ensuring appropriate affordability requirements. Staff received direction and continues to refine the draft development standards. Additional background information is provided in the staff report from January 26, 2022 (Attachment A).

DISCUSSION:

Existing Affordable Housing Regulations

Chapter 17.42 of the Zoning Code provides Inclusionary Housing Requirements that require multi-family development to include on-site or off-site affordable housing units, or to provide land donations or pay in-lieu fees, as part of an overall strategy to ensure that the addition of affordable housing units is in proportion with the overall increase in new housing units. Projects that include for-sale units must specify a minimum of 20 percent of the total number of units to be sold to very low, low, or moderate income households. Projects with rental units must dedicate a minimum of five percent of units for very-low income households, five percent to very-low or low income households, and 10 percent of units to very-low, low, or moderate income households.

Applicants may request a density bonus, as set forth in California Government Code Section 65915, for projects with five or more dwelling units. In exchange, an applicant must agree to dedicate at least one of the following:

- Five percent of units dedicated to very-low income households;
- 10 percent of units dedicated to low-income and very-low income households;
- 10 percent of units dedicated to moderate-income households and available to the general public for sale; or
- At least 35 percent of units available exclusively to persons aged 55 and older and those residing with them

Projects providing greater than the minimum affordability requirement may receive up to a 50 percent density bonus. Housing projects consisting of 100 percent affordable units for lower income households may receive up to an 80 percent density bonus, or no maximum limit if the project is 100% affordable to lower income households and is within one-half mile of a major transit stop.

Potential Amendments – Institutional Housing Developments

Staff has been exploring the establishment of regulations to allow affordable housing as a permitted and/or conditionally-permitted use on sites with certain existing institutional uses (such as religious facilities and colleges) in zones that do not currently allow housing, or which allow housing only as an accessory use, and recommends allowing housing in other zones, provided that such housing includes on-site affordable units. The development of these standards has been refined through input from both the public and Planning Commission.

Existing Conditional Use Permits

Many religious facilities are subject to existing conditional use permits. The amendment of a conditional use permit could be processed administratively in conjunction with a qualifying housing project, provided that there is no intensification of the religious facility's existing conditional use permit's allowances.

By-Right Housing – Up to 75 Units

Housing would be allowed by-right, in conjunction with the following existing institutional uses onsite:

- Colleges Nontraditional campus setting (land use). Includes public or private colleges and universities granting associate arts degrees, certificates, undergraduate and graduate degrees, and requiring for admission at least a high school diploma or equivalent general academic training. These facilities typically offer classrooms, laboratories, and staff offices within a shared office building, often containing typical business and professional office suites. This use does not include any form of student housing (e.g., dormitories, fraternities, multi-family housing, or sororities).
- Colleges Traditional campus setting (land use). Includes community colleges, public or private colleges and universities granting associate arts degrees, certificates, undergraduate and graduate degrees, and requiring for admission at least a high school diploma or equivalent general academic training. These facilities maintain a traditional campus setting, typically covering many acres of land with extensive landscaped court yards adjoining multi-story buildings that house lecture halls, classrooms, laboratories, and offices for professors and department administrative staff. Other on-campus structures may contain administrative centers, student unions, libraries and cafeteria facilities.
- Religious Facilities (land use). A facility in which the primary use is religious worship. A religious facility may include related accessory activities including religious education, ministry, clothing and food distribution, counseling, employment assistance, referral services, and support groups. Other uses (e.g. private schools and child day-care centers) that are located on the site of a religious assembly use shall not be accessory uses).

PS (Public, Semi-Public Zone) and IG (Industrial General): Allow housing at 32 du/ac or consistent with adjacent density for properties within PS Zoning District.

CG (Commercial General) and all commercial zones within Specific Plans: allow housing within the current allowable building footprint and set a minimum unit size of 350 square feet.

Housing Permitted with a Minor Conditional Use Permit

Allow Institutional Housing Development projects meeting the above requirements that wish to exceed the maximum 75 dwelling units subject to approval of a Minor Conditional Use Permit.

Additional Affordability Requirements

Require a percentage of units for Institutional Housing Development projects to be affordable beyond the current Inclusionary requirements, in the following manner:

- For rental housing, at least 80% of the units should be affordable to low-income households.
- For ownership housing, either 80% of the units should be affordable to moderateincome households, or 50% of the units should be affordable to lowincome households and 30% of the units should be affordable to households earning up to 150% AMI.

Development Standards

Examples of development standards for Institutional Housing Developments that may apply include, but are not limited to the following:

- Mixed-use standards as required by the zoning code would be required for all development that does not have residential development standards;
- Reductions in parking requirements and by-right shared parking specifically for housing on property owned by religious institutions.

CONCLUSION:

Staff seeks input on the recommendations in this report in advance of finalizing the draft standards to present at a future hearing. There are currently no submitted projects that would be subject to AB 1851 in the City, however there are a number of sites identified that could potentially accommodate residential units. The consideration of affordable housing located on property owned by religious institutions and other institutional parcels would increase the potential capacity for housing options in the City, but does not require such housing to be constructed.

Staff recommends allowing housing on institutional facility sites under certain circumstances with proposed development standards. In some cases the housing would be allowed by right and in other cases it would require a Minor Conditional Use Permit. Staff is seeking feedback from the Planning Commission in advance of preparing a Zoning Code amendment for consideration.

Respectfully submitted,

DAVID M. REYES

Director of Planning & Community Development Department

Reviewed by:

Martin Potter

Prepared by:

Planner

David Sanchez

Principal Planner

Attachments:

Attachment A – Planning Commission Study Session Staff Report (January 26, 2022)

Attachment B – PMC Chapter 17.42 (Inclusionary Housing Requirements)

ATTACHMENT A

2022-01-26 Planning Commission Staff Report



STAFF REPORT

DATE: JANUARY 26, 2022

TO: PLANNING COMMISSION

FROM: DAVID M. REYES, DIRECTOR OF PLANNING & COMMUNITY

DEVELOPMENT DEPARTMENT

SUBJECT: STUDY SESSION: HOUSING ON INSTITUTIONAL FACILITIES SITES

RECOMMENDATION:

This is an informational item only; there is no action required. The following report summarizes the City's outreach efforts and potential changes to existing development standards related to residential uses on underutilized parcels owned by institutions.

EXECUTIVE SUMMARY:

Recent efforts by churches and other faith-based organizations have prompted discussion of allowing affordable housing opportunities on sites owned by religious and faith-based institutions. The City has initiated a Zoning Code Amendment to define regulations related to housing on these properties and conducted outreach in the form of a Planning Commission Study Session (July 2020), City Council Study Session (October 2020), and Virtual Community Workshop (December 2020). The focus of this report is to provide a recap of comments received, provide recommendations from staff, and receive further input from the Commission and public. Staff would return at a later date to the Planning Commission for a recommendation on the regulations that would be presented to the City Council for adoption.

BACKGROUND:

July 8, 2020 – Planning Commission Study Session

Staff presented an overview of the issues raised by faith-based organizations related to an interest in providing housing on sites owned by religious facilities. The discussion included recent examples of such projects in San Diego and Walnut Creek, as well as a discussion of Senate Bill 899 (Wiener) and Assembly Bill 1851 (Wicks). Comments received from the Commission included the following:

- All housing developed on religious sites should be affordable;
- Consider focusing on amending the Public, Semi-Public zone in lieu of developing an overlay zone; and

Consider incorporating this amendment as part of the Specific Plan Update process

Subsequent to this study session, SB 899 did not move forward, however AB 1851 was passed and signed by Governor Newsom on September 28, 2020. A description of AB 1851 is below:

AB 1851 (Wicks)

Introduced on January 6, 2020, passed on August 27, 2020, and signed on September 28, 2020, this bill prohibits local agencies from denying a housing project proposed on property owned by religious institutions solely on the basis of parking, and provides minimum parking standards for such projects. The bill additionally defines a "religious institution affiliated housing development project" as one that meets <u>all</u> of the following criteria:

- The project is located on one or more contiguous parcels that are each owned entirely by a "religious institution", which is defined as an institution owned, controlled, and operated and maintained by a bona fide church, religious denomination, or religious organization composed of multidenominational members of the same well-recognized religion, lawfully operating as a nonprofit religious corporation.
- The project qualifies as being near co-located religious use parking, by any of the following means:
 - The project is located on one or more parcels that collectively contain religioususe parking
 - The project is located adjacent to a parcel owned by the religious institution that contains religious-use parking
 - The project is located on one or more parcels that are no more than 0.1 miles away from a parcel owned by the religious institution, which contains religioususe parking.
- The project qualifies for a density bonus under State law (only applies to projects with 5 or more units)

Per AB 1851, local agencies must reduce or eliminate parking requirements for qualifying projects. This parking reduction must be ministerial. Local agencies cannot require the replacement of parking spaces that would be eliminated, however, the number of parking spaces requested to be eliminated cannot exceed 50% of the number available at the time of the request. Local agencies also cannot require any pre-existing deficits in parking to be cured as a condition of approval.

October 2020 – City Council Update

On October 5, 2020, staff presented an informational update to the City Council for discussion and direction. Council members provided the following comments:

- Councilmember Wilson favored developing a process to determine if opportunities exist for transitional housing on sites owned by religious institutions and developing a community outreach process;
- Councilmember Gordo expressed concern with developing market-rate housing on a site owned by a religious institution which later decides to move, and suggested that additional community input would be needed;

- Mayor Tornek expressed support for allowing underutilized religious properties to be converted to affordable housing and recommended minimal standards;
- Councilmember McAustin favored allowing housing on religious properties but expressed concern with allowing too much market-rate housing;
- Councilmember Masuda expressed concern with market-rate housing and sought additional community input

Subsequent to the meeting, staff began developing a community outreach strategy, including a website (https://www.cityofpasadena.net/planning/planning-division/community-planning/religious-facility-housing/) where the public can view information and sign up for updates, view the Virtual Community Meeting held in December 2020, and obtain information on upcoming meetings.

<u>December 2020 – Virtual Community Meeting</u>

On December 15, 2020, staff hosted a Virtual Community Meeting with members of the public to discuss the proposed amendment and receive input. Approximately 120 people attended the workshop, with the majority expressing general support for allowing affordable housing to be developed on sites owned by religious facilities and providing suggestions such as modular structures, mobility options, and limiting regulatory barriers. Some residents expressed an interest in parking requirements and looking at portions of properties that are not currently used for parking.

DISCUSSION:

Existing Affordable Housing Regulations

Chapter 17.42 of the Zoning Code provides Inclusionary Housing Requirements that obligate proposed residential developments to include on-site or off-site affordable housing units, or to provide land donations or pay in-lieu fees, as part of an overall strategy to ensure that the addition of affordable housing units is in proportion with the overall increase in new housing units. Projects that include for-sale units must specify a minimum of 20 percent of the total number of units to be sold to very low, low, or moderate income households. Projects with rental units must dedicate a minimum of five percent of units for very-low income households, five percent to very-low or low income households, and 10 percent of units to very-low, low, or moderate income households.

Applicants may request a density bonus, as set forth in California Government Code Section 65915, for projects with five or more dwelling units. In exchange, an applicant must agree to dedicate at least one of the following:

- Five percent of units dedicated to very-low income households;
- 10 percent of units dedicated to low-income and very-low income households;
- 10 percent of units dedicated to moderate-income households and available to the general public for sale; or
- At least 35 percent of units available exclusively to persons aged 55 and older and those residing with them

Potential Amendments

Staff has been exploring the establishment of regulations that would allow affordable housing as a permitted and/or conditionally-permitted use on sites owned by institutions in zones that do not currently allow housing, or which allow housing only as an accessory use, and recommends allowing housing in other zones, provided that such housing includes on-site affordable units. Staff is seeking input from the Commission on potential regulations to enable such development, including:

- Allow housing within PS (Public- Semi Public) and CG (Commercial General) zones, subject to approval of a Minor Conditional Use Permit.
- Allow housing as a by-right use in commercial zones within the Fair Oaks/Orange Grove Specific Plan.
- Examples of development standards that may apply include, but are not limited to the following:
 - Housing use is limited to sites with existing institutional uses that would remain;
 - Reductions in parking requirements, specifically for housing on property owned by religious institutions and other institutions;
 - Evaluating standards such as density, height, and setback regulations to be compatible with the regulations found in adjacent zones.
 - Requiring that the housing built is affordable and the amount of units provided is greater than current Inclusionary Housing requirements;

Staff seeks input on the above recommendations and discussion regarding the impact of such standards on project feasibility. There are currently no submitted projects that would be subject to AB 1851 in the City, however there are a number of sites identified that could potentially accommodate residential units. The consideration of affordable housing located on property owned by religious institutions and other institutional parcels would increase the potential capacity for housing options in the City, but does not require such housing to be constructed.

CONCLUSION:

Staff recommends allowing housing on institutional facility sites under certain circumstances with proposed development standards. In some cases the housing would be allowed by right and in other cases it would require a Minor Conditional Use Permit. Staff is seeking feedback from the Planning Commission in advance of preparing a Zoning Code amendment for consideration.

Respectfully submitted,

DAVID M. REYES

Director of Planning & Community

Development Department

Prepared by:

Reviewed by:

Martin Potter Planner

David Sanchez Principal Planner

Attachments:

Attachment A – AB 1851 text

Attachment B – PMC Chapter 17.42 (Inclusionary Housing Requirements)

Attachment C – July 8, 2020 Planning Commission Staff Report and Presentation

Attachment D – San Diego Ordinance No. O-21161 (allows religious properties to utilize parking lots for affordable housing).

ATTACHMENT B

PMC Chapter 17.42 (Inclusionary Housing Requirements)

Chapter 17.42 - Inclusionary Housing Requirements

Footnotes:
--- (1) --Editor's note— The Title of Chapter 17.42 was amended by Ord. 7056 § 2.

17.42.010 - Purpose of Chapter

This Chapter establishes standards and procedures to encourage the development of housing that is affordable to a range of households with varying income levels. The purpose of this Chapter is to encourage the development and availability of affordable housing by ensuring that the addition of affordable housing units to the City's housing stock is in proportion with the overall increase in new housing units.

17.42.020 - Applicability and Exempt Projects

The requirements of this Chapter shall apply to all new residential projects, all subdivisions maps approved after the date of this Ordinance, and all single room occupancy projects, except as noted in Subsection B. The requirements of this Chapter shall apply to all developers and their agents, successors-in-interest, and assigns proposing a residential project. All inclusionary units required by this Chapter shall be sold or rented in compliance with this Chapter and the City's regulations for the implementation of this Chapter (see Subsection A).

- A. **Additional regulations.** The Council shall by resolution establish regulations for the implementation of this Chapter. (These regulations were first adopted by the Council on September 10, 2001 and are entitled "City of Pasadena Inclusionary Housing Regulations.") All references to "Director" in said regulations shall mean the City Manager or the Assistant City Manager.
- B. **Exempt projects.** The following are exempt from the requirements of this Chapter.
 - 1. **Project with discretionary approvals.** A residential project that has obtained:
 - a. Discretionary approval (e.g., a Conditional Use Permit, Variance, or Design Review approval) in compliance with this Zoning Code before the effective date of this Chapter; and
 - b. A Building Permit in compliance with the discretionary approval within 12 months of the effective date of this Chapter; and
 - c. A Certificate of Occupancy in compliance with the same discretionary approval.
 - 2. **Exempt by State law.** A residential project that is exempt from this Chapter by State law, including a project for which the City enters into a development agreement.
 - 3. **Project with Redevelopment Agreement.** A residential project for which the Community Development Commission has executed a Redevelopment Agreement, provided that the Redevelopment Agreement is effective at the time the residential project would otherwise be

required to comply with the requirements of this Chapter, and there is no uncured breach of the Redevelopment Agreement before issuance of a Certificate of Occupancy for the project.

(Ord. 7028 § 1, 2006; Ord. 7020 § 1, 2005)

17.42.030 - Definitions

All of the terms used in this Chapter are defined in <u>Article 8</u> (Glossary of Specialized Terms and Land Use Types) under the term "Affordable Housing Definitions."

17.42.040 - Inclusionary Unit Requirements

- A. **Minimum number of units required.** A minimum of 20 percent of the total number of dwelling units in a residential project shall be developed, offered to, and sold or rented to households of very low, low, and moderate-income, at an affordable housing cost, as follows.
 - 1. **Units for sale.** If the project consists of units for sale, a minimum of 20 percent of the total number of units in the project shall be sold to very low, low, or moderate-income households.
 - 2. **Rental units.** If the residential project consists of rental units, a minimum of five percent of the units shall be rented to very low-income households, five percent of the units shall be rented to very low or low-income households, and 10 percent of the units shall be rented to very low, or moderate-income households.
- B. Rounding of quantities in calculations. In calculating the required number of inclusionary units, fractional units of 0.75 or above shall be rounded-up to a whole unit if the residential project consists of 10 to 20 units; and fractional units of 0.50 or above shall be rounded-up to a whole unit if the project consists of 21 or more units. Notwithstanding the foregoing, the minimum requirement for any project shall not be less than one unit for very low, low or moderate-income households and one unit for very low or low-income households.

(Ord. No. 7353, § 2 (Exh. 1), 11-4-2019)

17.42.050 - Alternatives to Units within Project

As an alternative to developing required inclusionary units within an affected residential project in compliance with <u>Section 17.42.040</u> (Inclusionary Unit Requirement), the requirements of this Chapter may be satisfied through one or more of the following alternatives, in compliance with the City's regulations for the implementation of this Chapter (see Section 17.42.020.A).

- A. **In lieu fee.** The developer may choose to pay a fee in lieu of providing all or some of the inclusionary units, as follows.
 - 1. **Amount of fee.** The amount of the fee shall be as required by the Council's Fee Resolution.
 - 2. **Special adjustment for first 12 months.** For 12 months from the effective date of this Chapter, the fee shall be 40 percent of that required by the Council's Fee Resolution.
 - 3. Timing of payment. One-half of the in-lieu fee required by this Subsection shall be paid (or a letter of

- credit posted) before issuance of a Building Permit for any part of the residential project. The remainder of the fee shall be paid before a Certificate of Occupancy is issued for any unit in the project.
- 4. **Housing Trust Fund.** Fees collected in compliance with this Section shall be deposited in the Inclusionary Housing Trust Fund.
- B. **Off-site units.** Upon application by the developer and at the discretion of the City Manager or the Assistant City Manager, the developer may satisfy the inclusionary unit requirements for the project, in whole or in part, by constructing or substantially rehabilitating the required number of units on a site other than that of the affected residential project.
- C. Land donation. Upon application by the developer and at the discretion of the City Manager or the Assistant City Manager, the developer may satisfy the project inclusionary unit requirements, in whole or in part, by dedicating land to the City for the construction of the inclusionary units.
- D. On-site inclusionary units required when very low, low, and/or moderate income households are displaced. Any other provision of this chapter, notwithstanding, any project subject to this chapter which results in the displacement of very low, low, and/or moderate income household(s) shall be required to provide on-site inclusionary units as required by this chapter.

(7028 § 2, 2006; Ord. 7020 § 2, 2005)

17.42.060 - Housing Plan and Housing Agreement Required

- A. **Submittal and execution.** The developer shall comply with the following requirements at the times and in compliance with the standards and procedures in the City's regulations for the implementation of this Chapter (see Section 17.42.020.A).
 - 1. **Housing Plan.** The developer shall submit an Inclusionary Housing Plan for approval by the City Manager or the Assistant City Manager, detailing how the provisions of this Chapter will be implemented for the proposed project.
 - 2. **Housing Agreement.** The developer shall execute and cause to be recorded an Inclusionary Housing Agreement, unless the developer is complying with this Chapter as provided in Sections 17.42.050.A. (In lieu fee) or C. (Land donation).
- B. **Discretionary approvals.** No discretionary approval shall be issued for a residential project subject to this Chapter until the developer has submitted an Inclusionary Housing Plan.
- C. **Issuance of Building Permit.** No Building Permit shall be issued for a residential project subject to this Chapter unless the City Manager or the Assistant City Manager has approved the Inclusionary Housing Plan, and any required Inclusionary Housing Agreement has been recorded.
- D. **Issuance of Certificate of Occupancy.** A Certificate of Occupancy shall not be issued for a residential project subject to this Chapter unless the approved Inclusionary Housing Plan has been fully implemented.

(Ord. 7020 §§ 3, 4, 2005)

17.42.070 - Standards

- A. Location within project, relationship to non-inclusionary units. All inclusionary units shall be:
 - 1. Reasonably dispersed throughout the residential project;
 - 2. Proportional, in number, bedroom size, and location, to the market rate units; and
 - 3. Comparable with the market rate units in terms of the appearance, base design, materials, and finished quality.
- B. **Timing of construction.** All inclusionary units in a residential project shall be constructed concurrent with, or before the construction of the market rate units. If the City approves a phased project, the required inclusionary units shall be provided within each phase of the residential project.
- C. **Time limit for reserving units.** All required inclusionary units shall be reserved for low and moderate-income households at the applicable affordable housing cost for the following minimum time periods.
 - 1. **Units for sale 45 years.** A unit for sale shall be reserved for the target income level group at the applicable affordable housing cost for a minimum of 45 years.
 - 2. **Rental units Reserved in perpetuity.** A rental unit shall remain reserved for the target income level group at the applicable affordable housing cost in perpetuity.
- D. **Recapture of financial interest.** Notwithstanding Subsection C. 1., above, inclusionary units for sale may be sold to an above-moderate-income purchaser in compliance with the City's regulations for the implementation of this Chapter (see Section 17.42.020.A); provided that the sale shall result in a recapture by the City, or its designee, of a financial interest in the unit equal to:
 - 1. **Difference between price and value.** The difference between the initial affordable sales price and the appraised value at the time of the initial sale; and
 - 2. **Proportionate share of appreciation.** A proportionate share of any appreciation.
- E. **Preference and priority system.** The preference and priority system set forth in the City's Inclusionary Housing Regulations shall be used for determining eligibility among prospective beneficiaries for inclusionary units created through this Chapter.

(Ord. 7028 §§ 3, 4, 2006)

17.42.080 - Enforcement

- A. **Forfeiture of funds.** Any individual who sells or rents an inclusionary unit in violation of this Chapter shall be required to forfeit all money so obtained. Recovered funds shall be deposited into the Inclusionary Housing Trust Fund.
- B. **Legal actions.** The City may institute any appropriate legal actions or proceedings necessary to ensure compliance with this Chapter, including actions:
 - 1. To disapprove, revoke, or suspend any permit, including a Building Permit, Certificate of Occupancy, or discretionary approval; and
 - 2. For injunctive relief or damages.
- C. Recovery of costs. In any action to enforce this Chapter, or an Inclusionary Housing Agreement recorded

hereunder, the City shall be entitled to recover its reasonable attorney's fees and costs.

17.42.090 - Takings Determination

- A. Determination of a taking of property without just compensation.
 - 1. Initiated by request from developer. Commencing upon the approval or disapproval of the Inclusionary Housing Plan by the City Manager or the Assistant City Manager, in compliance with the City's regulations for the implementation of this Chapter (see Section 17.42.020.A), and within 15 days thereafter, a developer may request a determination that the requirements of this Chapter, taken together with the inclusionary incentives as applied to the residential project, would legally constitute a taking of property of the residential project without just compensation under the California or Federal Constitutions.
 - 2. **Burden on developer.** The developer has the burden of providing economic information and other evidence necessary to establish that application of the provisions of this Chapter to the project would constitute a taking of the property of the proposed project without just compensation.
 - 3. **City Manager or the Assistant City Manager's determination subject to appeal.** City Manager or the Assistant City Manager shall make the determination, which may be appealed in compliance with Chapter 17.72 (Appeals) except that the Council shall serve as the applicable review authority.
- B. **Presumption of facts.** In making the taking recommendation or determination, the review authority shall presume each of the following facts:
 - 1. **Application of requirements.** Application of the inclusionary housing requirement to the residential project;
 - 2. Incentives. Application of the inclusionary incentives;
 - 3. Product type. Utilization of the most cost-efficient product type for the inclusionary units; and
 - 4. External funding. External funding where reasonably likely to occur.
- C. **Modifications to reduce obligations.** If it is determined that the application of the provisions of this Chapter would be a taking, the Inclusionary Housing Plan shall be modified to reduce the obligations in the inclusionary housing component to the extent, and only to the extent necessary, to avoid a taking. If it is determined no taking would occur though application of this Chapter to the residential project, the requirements of this Chapter remain applicable.

(Ord. 7020 § 5, 2005)

17.42.100 - Inclusionary Housing Trust Fund

There is hereby established a separate fund of the City, to be known as the Inclusionary Housing Trust fund. All monies collected in compliance with Subsections <u>17.42.050</u> A. (In lieu fee), 17.42.080.D.(Recapture of financial interest), or <u>17.42.090</u> (Enforcement), above, shall be deposited in the Inclusionary Housing Trust Fund.

(Ord. 7056 § 2(c) (part), 2006)

17.42.110 - Administrative Fees

The Council may by resolution establish reasonable fees and deposits for the administration of this Chapter.

(Ord. 7056 § 2(c) (part), 2006)

17.42.120 - Appeal

Within 15 calendar days after the date of the City Manager or Assistant City Manager's decision, an appeal may be filed in compliance with <u>Chapter 17.72</u> (Appeals and Calls for Review).

(Ord. 7056 § 2(c)(part), 2006; Ord. 7020 § 6, 2005)

ATTACHMENT C PMC CHAPTER 17.42 (INCLUSIONARY HOUSING REQUIREMENTS)

Chapter 17.42 - Inclusionary Housing Requirements

Footnotes:
--- (1) --Editor's note— The Title of Chapter 17.42 was amended by Ord. 7056 § 2.

17.42.010 - Purpose of Chapter

This Chapter establishes standards and procedures to encourage the development of housing that is affordable to a range of households with varying income levels. The purpose of this Chapter is to encourage the development and availability of affordable housing by ensuring that the addition of affordable housing units to the City's housing stock is in proportion with the overall increase in new housing units.

17.42.020 - Applicability and Exempt Projects

The requirements of this Chapter shall apply to all new residential projects, all subdivisions maps approved after the date of this Ordinance, and all single room occupancy projects, except as noted in Subsection B. The requirements of this Chapter shall apply to all developers and their agents, successors-in-interest, and assigns proposing a residential project. All inclusionary units required by this Chapter shall be sold or rented in compliance with this Chapter and the City's regulations for the implementation of this Chapter (see Subsection A).

- A. **Additional regulations.** The Council shall by resolution establish regulations for the implementation of this Chapter. (These regulations were first adopted by the Council on September 10, 2001 and are entitled "City of Pasadena Inclusionary Housing Regulations.") All references to "Director" in said regulations shall mean the City Manager or the Assistant City Manager.
- B. **Exempt projects.** The following are exempt from the requirements of this Chapter.
 - 1. **Project with discretionary approvals.** A residential project that has obtained:
 - a. Discretionary approval (e.g., a Conditional Use Permit, Variance, or Design Review approval) in compliance with this Zoning Code before the effective date of this Chapter; and
 - b. A Building Permit in compliance with the discretionary approval within 12 months of the effective date of this Chapter; and

- c. A Certificate of Occupancy in compliance with the same discretionary approval.
- 2. **Exempt by State law.** A residential project that is exempt from this Chapter by State law, including a project for which the City enters into a development agreement.
- 3. **Project with Redevelopment Agreement.** A residential project for which the Community Development Commission has executed a Redevelopment Agreement, provided that the Redevelopment Agreement is effective at the time the residential project would otherwise be required to comply with the requirements of this Chapter, and there is no uncured breach of the Redevelopment Agreement before issuance of a Certificate of Occupancy for the project.

(Ord. 7028 § 1, 2006; Ord. 7020 § 1, 2005)

17.42.030 - Definitions

All of the terms used in this Chapter are defined in <u>Article 8</u> (Glossary of Specialized Terms and Land Use Types) under the term "Affordable Housing Definitions."

17.42.040 - Inclusionary Unit Requirements

- A. **Minimum number of units required.** A minimum of 20 percent of the total number of dwelling units in a residential project shall be developed, offered to, and sold or rented to households of very low, low, and moderate-income, at an affordable housing cost, as follows.
 - 1. **Units for sale**. If the project consists of units for sale, a minimum of 20 percent of the total number of units in the project shall be sold to very low, low, or moderate-income households.
 - 2. **Rental units.** If the residential project consists of rental units, a minimum of five percent of the units shall be rented to very low-income households, five percent of the units shall be rented to very low or low-income households, and 10 percent of the units shall be rented to very low, low, or moderate-income households.
- B. **Rounding of quantities in calculations.** In calculating the required number of inclusionary units, fractional units of 0.75 or above shall be rounded-up to a whole unit if the residential project consists of 10 to 20 units; and fractional units of 0.50 or above shall be rounded-up to a whole unit if the project consists of 21 or more units. Notwithstanding the foregoing, the minimum requirement for

any project shall not be less than one unit for very low, low or moderate-income households and one unit for very low or low-income households.

(Ord. No. 7353, § 2 (Exh. 1), 11-4-2019)

17.42.050 - Alternatives to Units within Project

As an alternative to developing required inclusionary units within an affected residential project in compliance with <u>Section 17.42.040</u> (Inclusionary Unit Requirement), the requirements of this Chapter may be satisfied through one or more of the following alternatives, in compliance with the City's regulations for the implementation of this Chapter (see Section 17.42.020.A).

- A. In lieu fee. The developer may choose to pay a fee in lieu of providing all or some of the inclusionary units, as follows.
 - 1. **Amount of fee.** The amount of the fee shall be as required by the Council's Fee Resolution.
 - 2. **Special adjustment for first 12 months.** For 12 months from the effective date of this Chapter, the fee shall be 40 percent of that required by the Council's Fee Resolution.
 - 3. **Timing of payment.** One-half of the in-lieu fee required by this Subsection shall be paid (or a letter of credit posted) before issuance of a Building Permit for any part of the residential project. The remainder of the fee shall be paid before a Certificate of Occupancy is issued for any unit in the project.
 - 4. Housing Trust Fund. Fees collected in compliance with this Section shall be deposited in the Inclusionary Housing Trust Fund.
- B. **Off-site units.** Upon application by the developer and at the discretion of the City Manager or the Assistant City Manager, the developer may satisfy the inclusionary unit requirements for the project, in whole or in part, by constructing or substantially rehabilitating the required number of units on a site other than that of the affected residential project.
- C. Land donation. Upon application by the developer and at the discretion of the City Manager or the Assistant City Manager, the developer may satisfy the project inclusionary unit requirements, in whole or in part, by dedicating land to the City for the construction of the inclusionary units.
- D. On-site inclusionary units required when very low, low, and/or moderate income households are displaced. Any other provision of this chapter, notwithstanding, any project subject to this chapter which results in the displacement of very low, low, and/or moderate income household(s) shall be required to provide on-site inclusionary units as required by this chapter.

(7028 § 2, 2006; Ord. 7020 § 2, 2005)

17.42.060 - Housing Plan and Housing Agreement Required

- A. **Submittal and execution.** The developer shall comply with the following requirements at the times and in compliance with the standards and procedures in the City's regulations for the implementation of this Chapter (see Section 17.42.020.A).
 - 1. **Housing Plan.** The developer shall submit an Inclusionary Housing Plan for approval by the City Manager or the Assistant City Manager, detailing how the provisions of this Chapter will be implemented for the proposed project.
 - 2. **Housing Agreement.** The developer shall execute and cause to be recorded an Inclusionary Housing Agreement, unless the developer is complying with this Chapter as provided in Sections 17.42.050.A. (In lieu fee) or C. (Land donation).
- B. **Discretionary approvals.** No discretionary approval shall be issued for a residential project subject to this Chapter until the developer has submitted an Inclusionary Housing Plan.
- C. **Issuance of Building Permit.** No Building Permit shall be issued for a residential project subject to this Chapter unless the City Manager or the Assistant City Manager has approved the Inclusionary Housing Plan, and any required Inclusionary Housing Agreement has been recorded.
- D. **Issuance of Certificate of Occupancy**. A Certificate of Occupancy shall not be issued for a residential project subject to this Chapter unless the approved Inclusionary Housing Plan has been fully implemented.

(Ord. 7020 §§ 3, 4, 2005)

17.42.070 - Standards

- A. Location within project, relationship to non-inclusionary units. All inclusionary units shall be:
 - 1. Reasonably dispersed throughout the residential project;
 - 2. Proportional, in number, bedroom size, and location, to the market rate units; and
 - 3. Comparable with the market rate units in terms of the appearance, base design, materials, and finished quality.
- B. **Timing of construction.** All inclusionary units in a residential project shall be constructed concurrent with, or before the construction of the market rate units. If the City approves a phased project, the required inclusionary units shall be provided within each phase of the residential project.
- C. Time limit for reserving units. All required inclusionary units shall be reserved for low and moderate-income households at the

applicable affordable housing cost for the following minimum time periods.

- 1. **Units for sale 45 years.** A unit for sale shall be reserved for the target income level group at the applicable affordable housing cost for a minimum of 45 years.
- 2. **Rental units Reserved in perpetuity.** A rental unit shall remain reserved for the target income level group at the applicable affordable housing cost in perpetuity.
- D. **Recapture of financial interest.** Notwithstanding Subsection C. 1., above, inclusionary units for sale may be sold to an above-moderate-income purchaser in compliance with the City's regulations for the implementation of this Chapter (see Section 17.42.020.A); provided that the sale shall result in a recapture by the City, or its designee, of a financial interest in the unit equal to:
 - 1. **Difference between price and value.** The difference between the initial affordable sales price and the appraised value at the time of the initial sale; and
 - 2. **Proportionate share of appreciation.** A proportionate share of any appreciation.
- E. **Preference and priority system.** The preference and priority system set forth in the City's Inclusionary Housing Regulations shall be used for determining eligibility among prospective beneficiaries for inclusionary units created through this Chapter.

(Ord. 7028 §§ 3, 4, 2006)

17.42.080 - Enforcement

- A. **Forfeiture of funds.** Any individual who sells or rents an inclusionary unit in violation of this Chapter shall be required to forfeit all money so obtained. Recovered funds shall be deposited into the Inclusionary Housing Trust Fund.
- B. **Legal actions.** The City may institute any appropriate legal actions or proceedings necessary to ensure compliance with this Chapter, including actions:
 - 1. To disapprove, revoke, or suspend any permit, including a Building Permit, Certificate of Occupancy, or discretionary approval; and
 - 2. For injunctive relief or damages.
- C. **Recovery of costs.** In any action to enforce this Chapter, or an Inclusionary Housing Agreement recorded hereunder, the City shall be entitled to recover its reasonable attorney's fees and costs.

17.42.090 - Takings Determination

- A. Determination of a taking of property without just compensation.
 - 1. **Initiated by request from developer.** Commencing upon the approval or disapproval of the Inclusionary Housing Plan by the City Manager or the Assistant City Manager, in compliance with the City's regulations for the implementation of this Chapter (see Section 17.42.020.A), and within 15 days thereafter, a developer may request a determination that the requirements of this Chapter, taken together with the inclusionary incentives as applied to the residential project, would legally constitute a taking of property of the residential project without just compensation under the California or Federal Constitutions.
 - 2. **Burden on developer.** The developer has the burden of providing economic information and other evidence necessary to establish that application of the provisions of this Chapter to the project would constitute a taking of the property of the proposed project without just compensation.
 - 3. **City Manager or the Assistant City Manager's determination subject to appeal.** City Manager or the Assistant City Manager shall make the determination, which may be appealed in compliance with <u>Chapter 17.72</u> (Appeals) except that the Council shall serve as the applicable review authority.
- B. **Presumption of facts.** In making the taking recommendation or determination, the review authority shall presume each of the following facts:
 - 1. Application of requirements. Application of the inclusionary housing requirement to the residential project;
 - 2. **Incentives**. Application of the inclusionary incentives;
 - 3. Product type. Utilization of the most cost-efficient product type for the inclusionary units; and
 - 4. External funding. External funding where reasonably likely to occur.
- C. **Modifications to reduce obligations.** If it is determined that the application of the provisions of this Chapter would be a taking, the Inclusionary Housing Plan shall be modified to reduce the obligations in the inclusionary housing component to the extent, and only to the extent necessary, to avoid a taking. If it is determined no taking would occur though application of this Chapter to the residential project, the requirements of this Chapter remain applicable.

(Ord. 7020 § 5, 2005)

There is hereby established a separate fund of the City, to be known as the Inclusionary Housing Trust fund. All monies collected in compliance with Subsections 17.42.050 A. (In lieu fee), 17.42.080.D.(Recapture of financial interest), or 17.42.090 (Enforcement), above, shall be deposited in the Inclusionary Housing Trust Fund.

(Ord. 7056 § 2(c) (part), 2006)

17.42.110 - Administrative Fees

The Council may by resolution establish reasonable fees and deposits for the administration of this Chapter.

(Ord. 7056 § 2(c) (part), 2006)

17.42.120 - Appeal

Within 15 calendar days after the date of the City Manager or Assistant City Manager's decision, an appeal may be filed in compliance with <u>Chapter 17.72</u> (Appeals and Calls for Review).

(Ord. 7056 § 2(c)(part), 2006; Ord. 7020 § 6, 2005)

ATTACHMENT D PMC CHAPTER 17.50.160 (MIXED-USE DEVELOPMENT STANDARDS)

17.50.160 - Mixed-Use Projects

- A. **Purpose.** The purpose of this Section is to ensure compatibility between the different land uses (e.g., residential and commercial) operating within a mixed-use project.
- B. **Zoning district standards.** The density, floor area ratio (FAR), height, and street setbacks for a mixed-use development project shall be determined by the underlying zoning district.
- C. **Commercial structure required.** When the residential units are located above the commercial uses, the structure shall be treated as a commercial type of structure for front and corner setbacks and no interior side setbacks shall be required. No rear yard setback is required unless specified for commercial uses.
- D. **Hours of operation.** Outside the Central District the commercial portion of projects shall comply with the Limited Hours of Operation requirements (Section <u>17.40.070</u>), if applicable.
- E. Commercial uses along street frontages.
 - 1. Commercial uses shall be located along street frontages and have a minimum depth of 50 feet. The Zoning Administrator may reduce the commercial uses for a secondary street.
 - 2. On corner lots, the commercial space shall turn (wrap around) the corner for a minimum depth of 50 feet.
 - 3. The Zoning Administrator shall determine the primary frontage for purposes of compliance with this Subsection.
 - 4. On double-frontage lots, commercial uses shall be located along both street frontages.
 - 5. Projects within the Central District shall comply with Figure 3-4 (Ground Floor Concept).
- F. **Ground floor residential units allowed.** Ground floor residential dwelling units located along secondary streets are allowed only if the structure is located on a corner lot.
- G. **Ground floor height.** Projects located in the Central District shall comply with the minimum ground floor height requirements of Table 3-2.
- H. Community space requirements.
 - 1. Community space defined.
 - a. Community space shall include both indoor/interior space and outdoor open space.
 - b. Community space can be in the form of private open space (e.g., balconies) or common open space (e.g., pool or side or rear setback areas.)
 - c. An indoor recreational room of up to 600 square feet may be credited toward fulfilling this community space requirement.

- d. A utility easement may be credited toward fulfilling this community space requirement if it is properly landscaped in compliance with <u>Characteristics</u> (Landscaping).
- 2. **Minimum space per unit.** Each development project shall provide a minimum of 150 square feet of community space for each dwelling unit.
- 3. **Front and/or corner side setbacks do not count.** Required front and/or corner side setbacks shall not be credited toward fulfilling this community space requirement.

4. Private open space.

- a. The private open space shall not exceed 30 percent of the total requirement for community space.
- b. Each private open space shall have a minimum six-foot dimension.
- c. This maximum 30 percent requirement may be modified by not more than five percent if determined to be necessary during Design Review.
- 5. **Community open space.** Each community open space shall have at least one minimum dimension of 15 feet and the other dimensions shall be at least six feet, except for private open space (e.g., balconies or patios).

I. Balconies.

- 1. Balconies may project no closer than six feet to an interior or rear property line and four feet into a front or corner side setback.
- 2. Balconies shall have a minimum dimension of six feet in order to count as required open space.
- 3. Balconies that are designed to project over the public right-of-way shall have prior approval from the Department of Public Works.
- J. **Inclusionary housing requirements.** Mixed-use projects shall be subject to the inclusionary housing requirements of <u>Section 17.42.040</u> (Inclusionary Unit Requirements).

K. Parking.

- 1. **Location.** The mixed-use project may have parking located at grade level behind the ground floor commercial/residential uses on the street frontage.
- 2. **Number of parking spaces required.** For new development projects, parking shall be provided in compliance with Table 4-6 for both the residential component and the commercial component. A minimum of one off-street parking space shall be located on-site for each residential unit in a new project.
- 3. **Guest parking required.** Guest parking shall be provided for the residential units in compliance with Table 4-6 (Off-Street Parking Space Requirements multi-family dwelling units).

- 4. **Off-site spaces.** All other parking spaces designed to serve the residential units may be located off-site with a long-term parking lease agreer compliance with Subparagraph 17.46.020 I. (Location and ownership).
- 5. **Distance requirements.** Off-site parking for residential units shall meet the distance requirements for commercial customer/visitor spaces.
- 6. **Conversion of existing structures.** Conversions of existing structures (including additions) may provide parking for the residential units off-site as long as they meet the distance requirements and there is a long term parking lease agreement all in compliance with Subparagraph 17.46.020 I. (Location and ownership).
- 7. Overnight parking permits not allowed.
 - a. City Permits for overnight parking on City streets shall not be issued for residential development projects built in compliance with these regulations.
 - b. Residential tenants shall be advised of the unavailability of on-street overnight parking permits.
- L. Lighting. Lighting for commercial uses shall be appropriately shielded to not negatively impact the residential units.

M. Noise notification.

- 1. Residents of a mixed-use development project shall be notified that they are living in an urban area and that the noise levels may be higher than in a typical residential area.
- 2. The signature of the residents shall confirm receipt and understanding of this information.

N. Loading.

- 1. **Off-street loading.** Off-street loading areas shall be located as far as possible from the residential units and shall be completely screened from view from the residential portion of the project.
- 2. **Loading and unloading of household goods.** If the loading of furniture and household goods for the residential units is to occur on the street, it shall be limited to the hours of 9:00 a.m. to 2:00 p.m. and 7:00 p.m. to 10:00 p.m. on weekdays and 9:00 a.m. to 10:00 p.m. on weekends.
- O. **Refuse and recycling areas.** Areas for the collection and storage of refuse and recyclable materials shall be located on the site in locations that are convenient for both the residential and nonresidential uses.

(Ord. 7099, § 32, 2007)

ATTACHMENT E INCLUDED ZONING DISTRICTS

Attachment E

Zoning Districts that would allow Religious Facility with Housing (land use)

Zoning Designation	Zoning District
Commercial Districts Special Purpose Districts	CO (Commercial Office) CG (General Commercial) CL (Limited Commercial) PS (Public, Semi-Public) Central District Specific Plan
Specific Plan Areas	 CD-5 (Lake Avenue) CD-6 (Arroyo Corridor/Fair Oaks) East Colorado Specific Plan ECSP-CG-5 (Commercial General, Lamanda Park area) ECSP-CG-6 (Commercial General, Chihuahuita area) Fair Oaks/Orange Grove Specific Plan FGSP-PS (Public, Semi-Public) FGSP-CL-1a (Limited Commercial District 1, Subdistrict "a") FGSP-CL-1b (Limited Commercial District 1, Subdistrict "b") FGSP-C-2 (Fair Oaks/Orange Grove Specific Plan – Limited Commercial District 2) FGSP-C-3a (Limited Commercial District 3, Subdistrict "b") FGSP-C-3b (Limited Commercial District 3, Subdistrict "b") FGSP-C-3c (Limited Commercial District 3, Subdistrict "c") East Pasadena Specific Plan EPSP-d1-IG (subarea d1, General Industrial District) EPSP-d2-CG (subarea d2, Commercial General) EPSP-d2-CG (subarea d2, Commercial Limited) EPSP-d2-CO (subarea d2, Commercial General) EPSP-d3-CG (subarea d3, Commercial Office) EPSP-d3-CG (subarea d3, Commercial General) EPSP-d2-PS (subarea d2, Public/Semi-Public District) North Lake Specific Plan CL-SP-1b (Commercial Limited, Village Building Type) CL-SP-1c (Commercial Limited, Village Building Type) CL-SP-1c (Commercial Limited, Village Building Type) CO-SP-1c (Commercial Office, House Building Type) CO-SP-1c (Commercial Office, Village Building Type) LA-CG (Commercial General) LA-CG (Commercial General) LA-CC (Commercial Limited) LA-CF (Commercial Limited) LA-CF (Commercial Limited)

ATTACHMENT F ADDENDUM TO 2015 GENERAL PLAN ENVIRONMENTAL IMPACT REPORT

Religious Facilities with Affordable Housing Ordinance

Addendum to the Pasadena General Plan Environmental Impact Report

Prepared for:

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April 2022

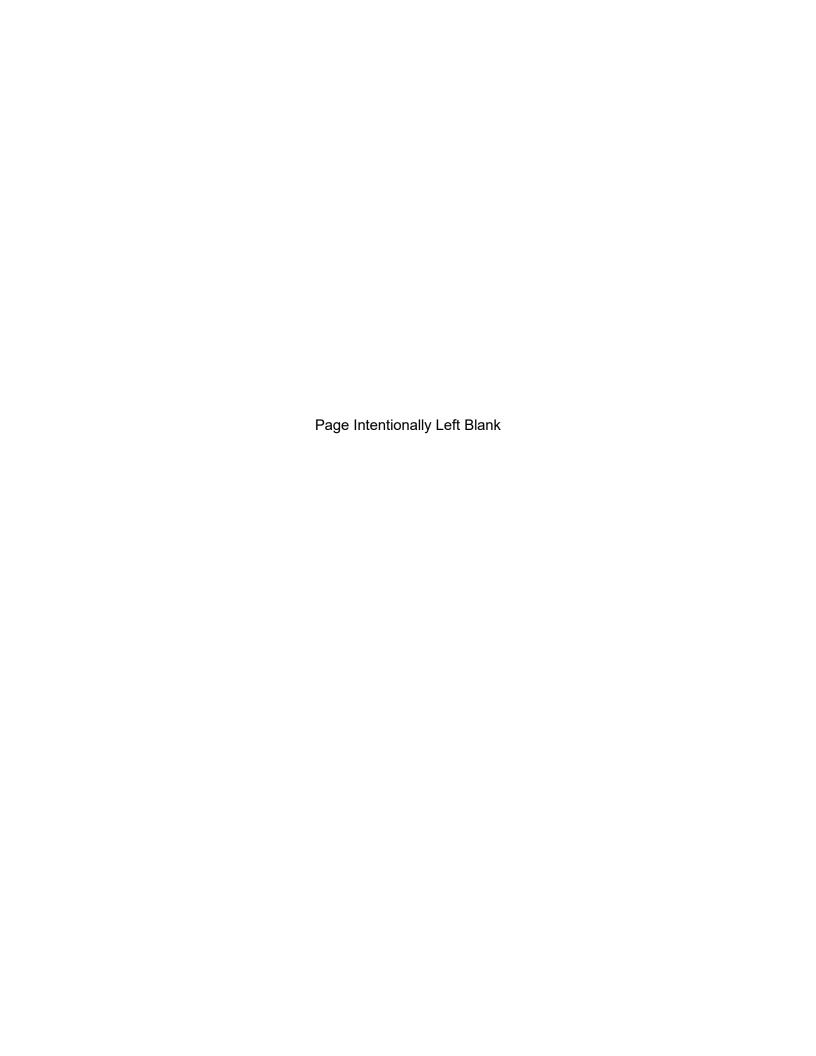


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Acronyms and Abbreviations

AB Assembly Bill

BMP Best Management Practice

CAAQS California Ambient Air Quality Standards

CARB California Air Resources Board
CEQA California Environmental Quality Act

CG Commercial General

Checklist Environmental Checklist Form

City City of Pasadena
CL Limited Commercial

CMP Congestion Management Program

CO Commercial Office du/ac dwelling units per acre

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

IS Initial Study LOS level of service

LTS Less than Significant Impact

LTS-M Less than Significant Impact with Mitigation

MERV Maximum efficiency rating value

MMRP Mitigation Monitoring and Reporting Program NAAQS National Ambient Air Quality Standards

 $\begin{array}{cc} NI & No \ Impact \\ O_3 & ozone \end{array}$

OEHHA Office of Environmental Health Hazard Assessment OSHA Occupational Safety and Health Administration

PFD Pasadena Fire Department

PM_{2.5} fine particulate matter 2.5 microns or less in diameter PM₁₀ respirable particulate matter ten microns or less in diameter

PPD Pasadena Police Department
PPL Pasadena Public Library
PS Public. Semi-Public

PUSD Pasadena Unified School District

PWP Pasadena Department of Water and Power

RM Multi-Family Residential RS Single-Family Residential

RTP/SCS Regional Transportation Plan/Sustainable Communities Strategy

SB Senate Bill

SCAB South Coast Air Basin

SCAG Southern California Association of Governments SCAQMD South Coast Air Quality Management District

S-U Significant and Unavoidable Impact

TDF Travel Demand Forecasting

VMT vehicle miles traveled

volatile organic compound vehicle trips VOC

VT

CHAPTER 1 PURPOSE AND BACKGROUND

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 site-specific environmental impacts associated with the Religious Facilities with Affordable Housing Ordinance (proposed ordinance or 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, and Mitigation Monitoring and Reporting Program (MMRP) adopted by the City Council on August 17, 2015 (Resolution No. 9451).

Following the adoption of the Pasadena General Plan and certification of the GP EIR, future discretionary actions include amendments and zone changes to provide consistency with the General Plan. In this regard, the City is proposing an ordinance to allow for a new land use category, "Religious Facilities with Affordable Housing", that would permit multi-family residential uses on sites that contain religious facilities. The proposed ordinance would permit Religious Facilities with Affordable Housing within certain zones on sites with an established Religious Facility land use that is owned by the Religious Facility.

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 zoning changes (CEQA Guidelines Section 15152[b]). Therefore, CEQA review required for the proposed project 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 the proposed ordinance 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., a proposed ordinance relating to land use matters) 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:

- 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;
 - 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(c) have been triggered. For a proposed modified project or related 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 2015 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 and included in Chapter 4. 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 ordinance and supporting responses (see Chapter 3), adoption of the Religious Facilities with Affordable Housing Ordinance would not result in substantial changes requiring major revisions to the previously certified GP EIR. Further, the proposed ordinance 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 ordinance. 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 under the Religious Facilities with Affordable Housing Ordinance. The City of Pasadena is the lead agency under CEQA and maintains authority to approve the Addendum for the adoption of the Religious Facilities with Affordable Housing Ordinance. Discretionary approvals being sought as part of the Religious Facilities with Affordable Housing Ordinance include the following:

- Acknowledgement of this Addendum to the GP EIR and that no subsequent CEQA document is required;
- Adoption of the proposed Religious Facilities with Affordable Housing Ordinance
- Zoning Code amendment(s) as necessary to implement the Religious Facilities
 with Affordable Housing Ordinance, such as to add the uses and standards
 proposed in the ordinance to the permitted uses and standards in the Zoning Code,
 to regulate zoning consistent with the General Plan, and any other minor technical
 updates needed for implementation of the proposed ordinance.

CHAPTER 2 PROJECT DESCRIPTION

2.1 Introduction

On August 18, 2015, the City certified the Pasadena General Plan Final Environmental Impact Report. The GP EIR analyzed potential citywide impacts, broad policy alternatives, and programmatic mitigation measures. The GP EIR analyzed 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 City is proposing an ordinance to allow for a new land use category, "Religious Facilities with Affordable Housing", that would permit multi-family residential uses on sites that contain religious facilities in certain zones (see Table 1, below). Within such zones, the proposed ordinance would permit Religious Facilities with Affordable Housing on any site with an established Religious Facility land use that is owned by the Religious Facility.

Pasadena Municipal Code 17.80.20 defines Religious Facilities as:

A facility in which the primary use is religious worship. A religious facility may include related accessory activities including religious education, ministry, clothing and food distribution, counseling, employment assistance, referral services, and support groups. Other uses (e.g., private schools and child day-care centers) that are located on the site of a religious assembly use shall not be accessory uses.

- 1. Temporary. Religious services conducted on a site that is not permanently occupied by a religious assembly use.
- 2. With Columbarium. A religious assembly use that has a structure with niches either located within a building or outdoors designed to accommodate cremated human remains contained in urns.
- 3. With Temporary Homeless Shelter. A religious assembly use with temporary facilities for the homeless.

Currently, residential uses are permitted by-right on certain sites that contain religious facilities but not on others. The overall purpose of the proposed project is to provide consistency in the allowable uses on sites with religious facilities by implementing a new land use category, Religious Facilities with Affordable Housing. The proposed Religious Facilities with Affordable Housing Ordinance would help achieve the goals and vision of the General Plan by bridging land uses to serve the community's affordable housing needs and allow for multi-family residential development on existing underutilized religious facility sites and potentially redeveloped sites.

The purpose of this Addendum to the GP EIR evaluates the environmental effects associated with the proposed Religious Facilities with Affordable Housing Ordinance 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 (Cal. Code of Regs. Section 15000 et seq.).

2.2 Project Location

The Religious Facilities with Affordable Housing Ordinance would apply to specific zones throughout the City of Pasadena. These zones are identified in Section 2.4.2 of this Addendum. Figure 1 shows the regional location of the City. Figure 2 shows the existing zones where housing is not permitted by-right and the location of existing religious facilities by whether or not housing is permitted by-right. Figure 3 shows the proposed zones that the Religious Facilities with Affordable Housing Ordinance would apply to.

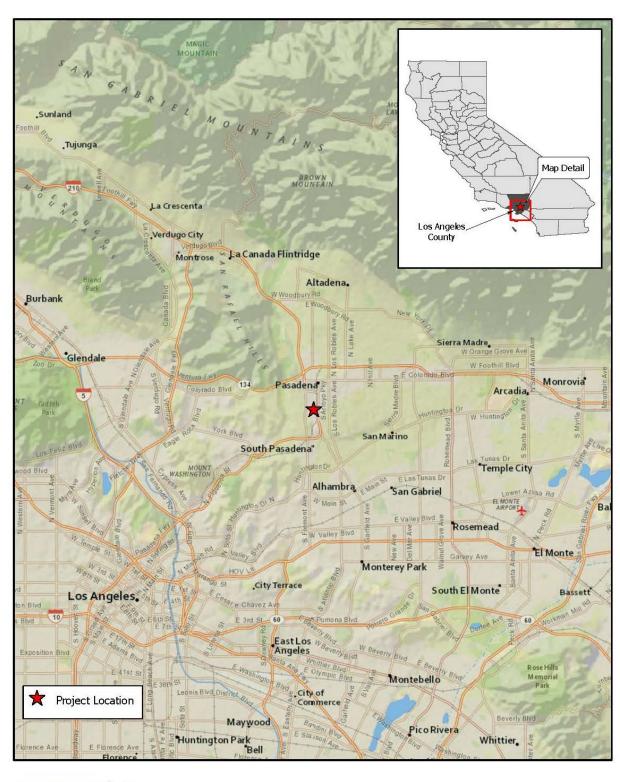






Figure 1 - Regional Location Map

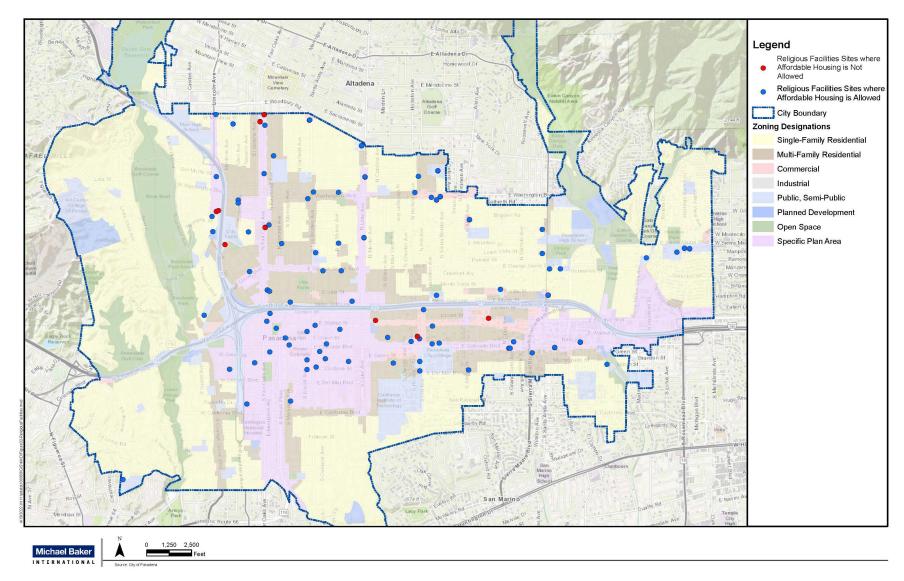


Figure 2 – Existing Religious Facilities and Zones Where Housing is Not Permitted By-Right

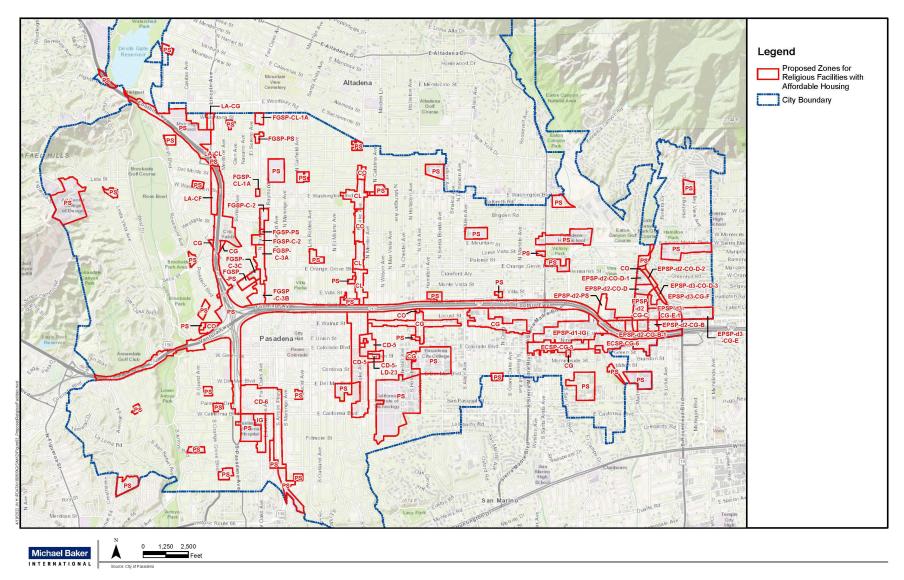


Figure 3 – Proposed Zones for Religious Facilities with Affordable Housing

2.3 Project Intent

The primary goals and objectives identified in the 2015 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.

Currently, residential uses are permitted by-right on certain sites that contain religious facilities but not on others. The overall purpose of the proposed project is to provide consistency in the allowable uses on sites with religious facilities by implementing a new land use category,

Religious Facilities with Affordable Housing. The proposed Religious Facilities with Affordable Housing Ordinance would help achieve the goals and vision of the General Plan by bridging land uses to serve the community's affordable housing needs and allow for multi-family residential development on existing underutilized religious facility sites and potentially redeveloped sites.

2.4 Description of the Proposed Project

The City is proposing an ordinance to allow for up to 75 dwelling units on religious facility properties to be permitted by-right with a density of 32 dwelling units per acre (du/ac). The proposed Religious Facilities with Affordable Housing Ordinance would add a new land use category "Religious Facilities with Affordable Housing" to permit the development of housing on properties with an established Religious Facility land use that is owned by the Religious Facility. The proposed ordinance would focus on commercial, public/institutional, and Specific Plan commercial and industrial zones where multi-family residential uses are not permitted by-right. The proposed Religious Facilities with Affordable Housing Ordinance would establish specific criteria related to residential density, affordability, adaptive reuse, and development standards. It would also include standards for religious facility sites that have existing Use Permits.

Based on the City's history of development, it is unlikely that new religious facilities that own their own property would be established. Even then, a smaller percentage of such new religious facilities that would be proposed in the City would also include a housing component. The proposed Religious Facilities with Affordable Housing Ordinance does not include any changes or modifications to Housing land use designations or single- or multi-family zoning districts (RS or RM zoning districts).

2.4.1 Relationship to 2015 General Plan

The 2015 Pasadena General Plan represented an update to the General Plan Elements, including the Mobility Element and the Land Use Element, which guides the overall physical development of the City. As this document compares the environmental impacts of the proposed Religious Facilities with Affordable Housing Ordinance to those analyzed in the GP EIR, it is important to note that the proposed Religious Facilities with Affordable Housing Ordinance does not modify or change the intent of the adopted General Plan. Rather, the Religious Facilities with Affordable Housing Ordinance is being proposed to achieve the goals and vision of the General Plan by bridging land uses to serve the community's affordable housing needs and allow for multi-family residential development on existing underutilized religious facility sites and potentially redeveloped sites. A Zoning Code amendment would be required to incorporate the proposed ordinance to regulate zoning and specific development standards for applicable sites.

2.4.2 Proposed Religious Facilities with Affordable Housing Ordinance Criteria

The proposed Religious Facilities with Affordable Housing Ordinance has identified specific zones that may be considered for the development of the new land use. From the set of identified zones, which are listed in Table 1 below, permissible sites are those that include an established Religious Facility land use owned by the Religious Facility. Once it is demonstrated that these initial criteria have been met, a Religious Facility may propose the development of an on-site multi-family residential project if an existing religious facility is

operational on-site; alternatively, if a religious facility does not yet exist or operate on-site, the development of a religious facility can be proposed concurrently with the multi-family residential use. Furthermore, such multi-family residential projects would be required to meet or address specific criteria related to residential density, affordability, adaptive reuse, and development standards. These criteria are detailed below.

Land Use and Zoning Designation

The proposed Religious Facilities with Affordable Housing Ordinance would add a new land use category: Religious Facilities with Affordable Housing. Religious Facilities with Affordable Housing would be an allowed land use in the zones presented in Table 1.

Table 1 – Proposed Zones Included in Religious Facilities with Affordable Housing
Ordinance

Ordinance							
Zoning Designation	Zoning District						
Commercial Districts	CO (Commercial Office) ² CG (General Commercial) ¹ CL (Limited Commercial) ²						
Special Purpose Districts	PS (Public, Semi-Public)						
Specific Plan Areas	Central District Specific Plan						

LA-CF (Commercial Flex)¹

Residential Density

Proposed multi-family housing developed pursuant to the proposed Religious Facilities with Affordable Housing Ordinance (Religious Housing) would allow up to 32 du/ac. Under the proposed Religious Facilities with Affordable Housing Ordinance, Religious Housing developments would not be allowed to exceed 75 dwelling units without a Density Bonus. However, with the approval of a Minor Conditional Use Permit, Religious Housing developments would be allowed to exceed 75 dwelling units.

Affordability

The proposed Religious Facilities with Affordable Housing Ordinance would include requirements for affordability that would support the General Plan's goals of creating a socially and economically sustainable community. Thus, the proposed Religious Facilities with Affordable Housing Ordinance would include requirements for both the sale and rental of units developed as Religious Housing. Under the proposed Religious Facilities with Affordable Housing Ordinance, for sale Religious Housing developments would require a minimum of 80 percent of the total number of units of housing developments to be sold to moderate-income households, or a minimum of 50 percent of the units to be sold to low-income households and 30 percent of the units would be sold to households earning up to 150 percent area median income. Rental Religious Housing would require a minimum of 80 percent of the units to be rented to low-income households.

Adaptive Reuse

The proposed Religious Facilities with Affordable Housing Ordinance would allow portions of existing buildings to be converted to residential units without requiring the provision of open space.

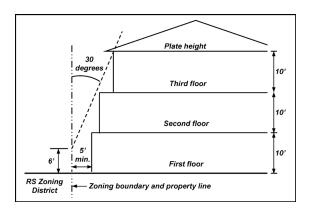
Development Standards

Development standards proposed by the Religious Facilities with Affordable Housing Ordinance would define setbacks, community space, and parking requirements for Religious Facilities with Affordable Housing.

Religious Facilities with Affordable Housing would utilize the development standards (setbacks, height, FAR) of the underlying zoning district in conjunction with the community space requirements of the Mixed-Use Development Standards (Pasadena Municipal Code Section 17.50.160.H). In the PS zoning district, the development standards of the least restrictive abutting zoning district would also apply. Additionally, in the PS zoning district the encroachment plane below would apply to any property line shared with residentially zoned properties.

¹ Allow multi-family residential use where residential use was not previously allowed by-right

² Utilize development standards of proposed use in lieu of City of Gardens development standards (i.e., Pasadena Municipal Code Section 17.22.060 through 17.22.080 – RM District General Development Standards)



In the PS (Public/Semi-Public) zoning district and commercial zones where multi-family housing is not a permitted use, projects would provide 150 square feet of community space per dwelling unit, pursuant to the Mixed Use Projects development standards in Pasadena Municipal Code Section 17.50.160.

In addition, up to 50 percent of the required number of parking spaces for the existing or proposed religious facility can be eliminated or reduced in the case of a plan for a new development, and remaining parking can be shared between the Religious Facility and the Religious Housing. The reduction in parking spaces would not reduce the minimum parking standards for the Religious Housing component to less than one space per unit unless within proximity to public transit or a car share vehicle.

Existing Use Permits

The proposed Religious Facilities with Affordable Housing Ordinance also includes provisions for sites that have existing Use Permits for religious facilities. Such existing Use Permits for religious facilities would not require any modifications, and operational conditions of the religious facilities (e.g., hours, occupancy limits, types of uses, assembly area or number of seats) would remain in effect. Development standards for Religious Housing, as described in the previous sections, would supersede conditions of approval regulating development standards. Such standards include FAR, Parking, Height, Setbacks and Open Space.

CHAPTER 3 EVALUATION OF ENVIRONMENTAL IMPACTS

The following evaluation assesses the environmental impacts of the proposed Religious Facilities with Affordable Housing Ordinance in relation to the analysis provided in the 2015 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 Religious Facilities with Affordable Housing Ordinance's 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 Religious Facilities with Affordable Housing Ordinance 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 GP EIR MMRP will be 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 (IS) prepared for the GP Update and were therefore excluded from further analysis in the GP EIR, are identified with "(IS)" after the impact conclusion.

Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?

I.	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
	Would the project:						
a)	Have a substantial adverse effect on a scenic vista?	LTS	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?	LTS	LTS (IS)	No	No	No	No
c)	Substantially degrade the existing visual character or quality of the site and its surroundings?	LTS	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?	LTS	LTS	No	No	No	No

Discussion:

The GP EIR concluded that implementation of the approved General Plan Update would result in less than significant environmental impacts to aesthetics. While buildout of the General Plan would change the visual appearance of parcels in all areas of the City and its

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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sphere of influence by allowing new development or redevelopment, the GP EIR stated that the City's specific plan areas are most likely to experience changes in visual appearance and aesthetic character. The GP EIR found that development in accordance with the General Plan Land Use Element would not propose changes in the City's topography, tall buildings that would block views, or the redevelopment of entire neighborhoods. Additionally, the overall visual appearance and character of older, single-family residential neighborhoods is expected to remain intact, and no major obstructions of scenic views are anticipated. Scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway were addressed in the IS prepared for the GP EIR, which found that impacts to this topic would be less than significant following the implementation of the General Plan Update. The GP EIR determined that although permitted development under the approved General Plan Update could result in increased light and glare, new development would be required to comply with the standards of the Municipal Code, design guidelines, Land Use Element policies that require that lighting be shielded and efficient, and other regulations related to light and glare. Thus, the GP EIR found this issue to be less than significant. Overall, the GP EIR concluded that proposed land use changes in the General Plan Update would not adversely impact visual and scenic quality.

As detailed in Section 2.4.2, the proposed ordinance would allow for housing uses on religious facility properties to be permitted by-right up to 75 dwelling units as currently, residential uses are only permitted by-right on certain sites that contain religious facilities but not on others. The proposed Religious Facilities with Affordable Housing Ordinance would establish specific criteria related to residential density and development standards, such as for setbacks and height. It would also establish standards for religious facility sites that have existing Use Permits, which would require that development standards for the Religious Housing component of the future development project be consistent with the development standards of the underlying zoning district or the least restrictive adjacent zones. For potential Religious Housing on religious facilities sites within the specific plan areas, future projects would be required to comply with the General Plan policies and applicable specific plan design guidelines for context-sensitive design to ensure less than significant impacts related to aesthetics. For potential Religious Housing on religious facilities sites that are surrounded by single-family residential uses (e.g., PS zones) and outside of the specific plan areas, the overall visual appearance and character of those neighborhoods is expected to remain

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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intact as the development standards of the least restrictive adjacent zone (i.e., RS) would apply to the Religious Housing component; no major obstructions of scenic views are anticipated, similar to the uses analyzed in the GP EIR. As such, implementation of the proposed ordinance would be subject to the development standards (including those for FAR, parking, height, setbacks, open space) of the underlying zoning district, or the least restrictive adjacent zone, and Religious Housing would support continuity of existing neighborhood features. Additionally, as stated in Section 2.4.2, the proposed ordinance does not include any changes or modifications to Housing land use designations or single- or multi-family zoning districts.

Similar to the GP EIR, development pursuant to the proposed Religious Facilities with Affordable Housing Ordinance would generate new sources of light and glare that could affect day or nighttime views in the City from increased development intensities. However, similar to the development analyzed under the GP EIR, new development or redevelopment would be required to comply with standards outlined in the Municipal Code, design guidelines, Land Use Element policies that require that lighting be shielded and efficient, and other regulations related to light and glare. Therefore, similar to the GP EIR, the proposed ordinance would result in less than significant impacts related to light and glare.

Additionally, as determined in the IS, impacts to scenic highways would be less than significant, which would be similar for implementation of the proposed ordinance. No potential sites associated with the proposed ordinance are located near State Route 2 and the potential sites that are located adjacent or near State Route 110 are currently built out. Therefore, the proposed ordinance would result in less than significant impacts to state scenic highways.

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:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
II.	AGRICULTURAL RESOURCES. Would the project:						
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	NI	NI (IS)	No	No	No	No
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	NI	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])?	NI	NI (IS)	No	No	No	No

	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	NI	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

Agriculture and forestry resources were addressed in the IS prepared for the GP EIR, which found that impacts to this topic would be less than significant following the implementation of the General Plan Update. The City of Pasadena has no farmland, land zoned for agricultural use, Williamson Act contracts, timberland or Timberland production, or forest land. The IS also stated that the Zoning Code permits commercial growing in CG (General Commercial), CL (Limited Commercial), and IG (General Industrial) zones and conditionally in the RS (Single-Family Residential) and RM (Multi-Family Residential) designated zoning districts and certain specific plan areas; however, the General Plan Update did not alter uses permitted by the Zoning Code, and the objectives of the General Plan Update did not relate to or conflict with commercial growing. Therefore, General Plan Update did not have any impacts to agriculture and forestry resources.

As no farmland, land zoned for agricultural use, land with Williamson Act contracts, timberland, or forest land exists within the City, implementation of the proposed Religious Facilities with Affordable Housing Ordinance would not convert or conflict with the Zoning Code for land zoned for agricultural use, land with Williamson Act contracts, farmland, timberland, or forest land. The proposed

¹ City of Pasadena, Initial Study/Notice of Preparation, 2013.

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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Religious Facilities with Affordable Housing Ordinance would include a new land use that would allow for multi-family residential uses to be permitted on any site with an established Religious Facility land use that is owned by the Religious Facility, and establishes new development standards within zones that allow commercial growing, including CG (General Commercial), CL (Limited Commercial), and one IG (General Industrial) zone (i.e., EPSP-d1-IG) as well as certain specific plan areas. However, the proposed ordinance would only apply to sites with an established Religious Facility land use and does not include land use provisions or regulations related to commercial growing. Therefore, the proposed Religious Facilities with Affordable Housing Ordinance would result in no impact to agricultural resources.

	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?	
III.	III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:							
a)	Conflict with or obstruct implementation of the applicable air quality plan?	S-U	S-U	No	No	No	No	
b)	Violate any air quality standard or contribute to an existing or projected air quality violation?	S-U	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?	S-U	S-U	No	No	No	No	
d)	Expose sensitive receptors to substantial pollutant concentrations?	LTS-M(GP)	LTS-M	No	No	No	No	
e)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LTS	LTS-M	No	No	No	No	

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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The GP EIR found that potentially significant impacts to air quality would occur if mitigation measures were not incorporated; in some instances, the GP EIR found impacts to air quality to be significant and unavoidable because no feasible mitigation measures would be available to reduce impacts to a less than significant level. The City of Pasadena is entirely within the South Coast Air Basin (SCAB) and therefore must comply with the rules and regulations imposed by the South Coast Air Quality Management District (SCAQMD). The SCAB is also subject to the California Ambient Air Quality Standards (CAAQS) adopted by the California Air Resources Board (CARB) and the National Ambient Air Quality Standards (NAAQS) adopted by the federal government. The SCAB is designated a nonattainment area (i.e., an area that does not meet the ambient air quality standards) for ozone (O₃), fine inhalable particulate matter (PM_{2.5}), and coarse inhalable particulate matter (PM₁₀) under the CAAQS, and a nonattainment area for O₃, PM_{2.5}, and lead (Los Angeles County only) under the NAAQS.² The GP EIR concluded that buildout of the General Plan Update would increase employment and population beyond current SCAG forecasts and contribute to cumulative SCAB nonattainment designations. While certain aspects of the General Plan Update Land Use Plan would lead to improvements in transportation and thus decrease emissions from that source, the GP EIR found that even with implementation of Mitigation Measure 2-1, requiring the preparation of a technical assessment evaluating potential project construction-related air quality impacts to the City Planning Division prior to issuance of construction permits, and Mitigation Measure 2-2, requiring the preparation of a technical assessment evaluating potential project operation-related air quality impacts to the City Planning Division prior to project approval, construction and operation impacts would not be reduced below the required SCAQMD thresholds, and that future impacts could be significant and unavoidable. The GP EIR stated that although submission of a technical assessment for possible construction related impacts required by Mitigation Measure 2-1 could reduce criteria air pollutant impacts for individual projects, the cumulative impact of all future construction emissions would result in significant and unavoidable impacts. In relation to the operation of buildout, the GP EIR stated that future activity would exceed SCAQMD thresholds

² California Air Resources Board (CARB), 2014a, April 17. Area Designations Maps/State and National, http://www.arb.ca.gov/desig/adm/adm.htm

as well, and that while Mitigation Measure 2-2 requiring the submission of an emissions assessment for operation-related impacts for individual future development projects, could reduce individual project impacts, the cumulative impacts of the General Plan Update buildout would be significant and unavoidable. The GP EIR found that implementation of the General Plan Update could expose existing or planned sensitive receptors to criteria air pollutants and toxic air contaminants, but that Mitigation Measure 2-3, requiring the submittal of a Health Risk Assessment (HRA) for certain new industrial or warehousing land uses requiring use of diesel trucks within 1,000 feet of a sensitive land use prior to project approval, would ensure that mobile sources of toxic air contaminants not covered under SCAQMD permits would be considered during subsequent project-level environmental review. The HRA prepared for those projects identified under Mitigation Measure 2-3 would identify project-specific measures to minimize health risk and individual projects would be required to achieve the incremental risk thresholds established by SCAQMD, thus reducing impacts to less than significant. This, however, would only reduce the impact on a project-by-project basis, and the GP EIR concluded that the future buildout of the General Plan Update would result in cumulative impacts to sensitive receptors that are significant and unavoidable. The GP EIR found that Mitigation Measure 2-4 would require that major sources of air pollutants achieve incremental risk thresholds when placed near a sensitive receptor, and Mitigation Measure 2-5 practice measures to minimize odors, reducing both impacts to a less than significant level.

The proposed Religious Facilities with Affordable Housing Ordinance would apply to sites that are located within the City of Pasadena and thus, within the bounds of the area analyzed by the GP EIR; however, sites associated with the proposed Religious Facilities with Affordable Housing Ordinance only account for a small portion of the City analyzed under the GP EIR. The proposed Religious Facilities with Affordable Housing Ordinance would only be allowed on sites that include an established Religious Facility land use owned by a Religious Facility and would be required to meet or address specific criteria related to residential density, affordability, adaptive reuse, and development standards. Similar to the impacts addressed in the GP EIR, impacts to air quality from the buildout of the sites associated with the proposed Religious Facilities with Affordable Housing Ordinance would be less than significant for each individual project (and will be analyzed on a project-by-project basis), but that the magnitude of future buildout could result in cumulative impacts that are significant and unavoidable. GP EIR Mitigation Measures 2-1, 2-2, and 2-4 would be applicable to development of the sites

Religious Fac Issues and Supporting Data with Afford Sources: Housing Ordi Impact Concl	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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associated with the proposed Religious Facilities with Affordable Housing Ordinance. Implementation of the proposed Religious Facilities with Affordable Housing Ordinance in accordance with these mitigation measures would not result in increased impacts from those identified in the GP EIR, and given that the sites that would be developed pursuant to the proposed Religious Facilities with Affordable Housing Ordinance is pointedly small, and with a reduced built out capacity than the area analyzed under the GP EIR, the proposed Religious Facilities with Affordable Housing Ordinance would be anticipated to result in less impacts compared to those identified in the GP EIR.

	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
IV.	BIOLOGICAL RESOURCES Would the project:						
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	LTS-M(GP)	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?	LTS-M(GP)	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,	LTS-M(GP)	LTS-M	No	No	No	No

	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
	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?	LTS	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?	NI	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?	NI	NI (IS)	No	No	No	No

The GP EIR identified four areas within the boundaries of the General Plan Update area where sensitive natural habitats occur to varying degrees, including Arroyo Seco, Eaton Canyon Corridor, Hastings Canyon, and the San Rafael Hills; however, the land use changes included within the General Plan Update would be confined to the eight specific plan areas within the City, none of which

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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contain sensitive natural habitats and all of which are urbanized or suburban in character. Yet, because Arroyo Seco, Eaton Canyon Corridor, Hastings Canyon, and the San Rafael Hills all contain sensitive natural habitats, the GP EIR concluded that buildout of the General Plan Update could cause potentially significant impacts to biological resources. 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 states that buildout of the General Plan Update could have potentially significant impacts to sensitive species, sensitive natural communities, and jurisdictional waters and/or wetlands. 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; impacts would then be reduced to a less than significant level following implementation of the mitigation measures. The IS prepared for the GP EIR found that development projects approved under the GP Update, including within the City's eight specific plan areas, 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, 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 IS 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.

As stated in the GP EIR, proposed land use changes would be confined to the eight specific plan areas in the City, including the several specific plan areas which the proposed Religious Facilities with Affordable Housing Ordinance would also apply to sites outside of the specific plan areas which are zoned for CO (Commercial Office), CG (General Commercial), CL (Limited Commercial) and PS (Public, Semi-public), of which future development was accounted for in the GP EIR as areas with no specific plan designation. As discussed in the GP EIR, there are no natural habitats or sensitive species in the specific plan areas, and development pursuant to the proposed ordinance in these areas

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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would not result in impacts to sensitive biological resources. Additionally, the GP EIR concluded that the specific plan areas did not contain any jurisdictional waters, or wetlands.

As discussed, the GP EIR identified four areas within the boundaries of the General Plan Update area where sensitive natural habitats occur to varying degrees, including Arroyo Seco, Eaton Canyon Corridor, Hastings Canyon, and the San Rafael Hills. The proposed Religious Facilities with Affordable Housing Ordinance would theoretically apply to two sites that are zoned PS, located in the San Rafael Hills; however, the sites are already developed with Institutional Uses (Art Center College of Design campus and Linda Vista Elementary School) and would need to be redeveloped with religious uses for housing units to be developed/established pursuant to the proposed ordinance. Similar to the GP EIR, no other changes are proposed within the boundaries of any sites designated as Open Space under the General Plan, and implementation of the proposed ordinance would not impact sensitive biological resources in these areas. Additionally, implementation of the proposed ordinance would not impact jurisdictional waters or wetlands in Arroyo Seco, Eaton Canyon, and Hastings Canyon as no land uses change or development is proposed in these areas. However, riparian and/or wetland habitats occur in several small drainages in the San Rafael Hills, including the PS zones within the San Rafael Hills. GP EIR Mitigation Measures 3-1 through 3-6 would be applicable to development of the sites associated with the proposed Religious Facilities with Affordable Housing Ordinance.

Similar to the General Plan Update, development pursuant to the proposed ordinance 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, as applicable. Therefore, development pursuant to the proposed Religious Facilities with Affordable Housing Ordinance 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 IS prepared for the GP, there are no adopted habitat conservation or natural community conservation plans within the City. Therefore, the proposed Religious Facilities with Affordable Housing would not result in impacts to any such plans.

Issues and Supporting Data Sources: Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
V.	CULTURAL RESOURCES Would the project:						
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	LTS-M(GP)	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?	LTS-M(GP)	LTS-M	No	No	No	No
c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	LTS-M(GP)	LTS-M	No	No	No	No
d)	Disturb any human remains, including those interred outside of formal cemeteries?	LTS	LTS	No	No	No	No

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 lists 7,440 historical resources throughout the City which meet at least one state or national criteria. The GP EIR states that the likelihood of encountering

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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and impacting a historical resource is greater within a historic district, and that any specific plan area that is within or adjacent to a historic district has a greater likelihood for impacting historical resources. The Central District, North Lake, and Fair Oaks/Orange Grove Specific Plan Areas contain and/or are adjacent to historic landmarks and/or historic districts. The GP EIR states 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, Mitigation Measure 9-4 would ensure that vibrations from construction activity would not impact architectural structures of historical significance. Impacts to archaeological resources can be reduced to a less than significant level upon implementation of 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 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 within the General Plan Update area are not expected to disturb human remains.

The proposed Religious Facilities with Affordable Housing Ordinance would apply to sites that are located within the City of Pasadena and thus, within the bounds of the area analyzed by the GP EIR. Sites associated with the proposed Religious Facilities with Affordable Housing Ordinance are located throughout the City and may be adjacent to or within a landmark or historic district within the City, specifically in the Central District, North Lake, and Fair Oaks/Orange Grove Specific Plan Areas. However, similar to the GP EIR, development pursuant to the proposed Religious Facilities with Affordable Housing Ordinance 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, Mitigation Measure 9-4 would ensure that vibrations from construction activity adjacent to historic buildings would not impact architectural structures of historical significance.

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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If archaeological resources are discovered during construction of any project that would be developed pursuant to the proposed Religious Facilities with Affordable Housing Ordinance, GP EIR Mitigation Measure 4-1 would be implemented, and the impact level would be less than significant. Except for a small area located at the southwest portion of the City, the sites associated with the proposed Religious Facilities with Affordable Housing Ordinance are not located in a sensitive paleontological area. For future projects developed within paleontologically sensitive areas pursuant to the proposed ordinance, GP EIR Mitigation Measure 4-2 would apply, which would ensure any impacts to paleontological resources would be less than significant. As the proposed Religious Facilities with Affordable Housing Ordinance would apply to sites that are located within the City of Pasadena and thus, within the area analyzed in the GP EIR, which is not likely to contain unknown human remains, with the required compliance with Health and Safety Code, implementation of the proposed ordinance would not significantly impact human remains.

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. No sacred lands were identified during consultation in the areas associated with the proposed Religious Facilities with Affordable Housing Ordinance. 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. Development in accordance with the proposed Religious Facilities with Affordable Housing Ordinance would implement GP EIR Mitigation Measure 4-1 if any archaeological resources, including tribal cultural resources, are discovered during construction, reducing the impact level to less than significant.

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³ City of Pasadena. 2015 General Plan EIR. Figure 5.4-2: *Paleontological Sensitivity*.

		Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
VI.	ENERGY Would the project:						
a)	Conflict with adopted energy conservation plans?	LTS	LTS (IS)	No	No	No	No
b)	Use non-renewable resources in a wasteful and inefficient manner?	LTS	LTS (IS)	No	No	No	No

Energy was not addressed in the GP EIR, as the IS prepared for the GP EIR found that impacts to this topic from buildout of the General Plan would be less than significant. The IS stated that Pasadena's Department of Water and Power (PWP) had the capacity to service the projected buildout of the General Plan Update.⁴ Additionally, the IS stated that the City of Pasadena is wholly within the bounds of a Southern California Gas Company service area. Forecasted use from the buildout of the General Plan Update – which would be an increase in energy use - was found to be within the capacity of existing facilities.⁵ All new development and tenant improvements would be required to comply with the California Energy Code, Part 6 of the California Building Standards Code (Title 24), CALGreen standards, Leadership in Energy and Environmental Design (LEED) standards, the City's Green Action Plan, the City's Green Building Standards Code (14.04.504), and the Open Space and Conservation Element of the General Plan, which together would increase efficiency and decrease consumption levels compared to existing structures built under the 2008 Building and Energy Efficiency Standards or targets established prior to those standards.⁶ As such, the intensification of energy use resulting from buildout of the General Plan Update would result in a less than significant impact.

Addendum to the Pasadena General Plan EIR

⁴ City of Pasadena, Initial Study/Notice of Preparation, 2013.

⁵ City of Pasadena, Initial Study/Notice of Preparation, 2013.

⁶ City of Pasadena, Initial Study/Notice of Preparation, 2013.

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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The proposed Religious Facilities with Affordable Housing Ordinance would apply to sites that are located within the City of Pasadena and thus, within the bounds of the area analyzed by the IS and GP EIR. The proposed ordinance would allow for multi-family residential uses in zones where housing was not previously allowed, and thereby could potentially increase demand in energy over existing conditions. However, given that the sites that would be developed pursuant to the proposed Religious Facilities with Affordable Housing Ordinance is pointedly small and with a reduced built out capacity than the area analyzed under the GP EIR, this increase in development is not expected to exceed forecasted use captured under the IS and GP EIR.

	Supporting Data urces:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
VII. GEOLOGY Would the p	AND SOILS						
a) Expose peopl potential subs	e or structures to stantial adverse ing the risk of loss,						
on the mo Priolo Ear Map issue Geologist on other s of a know California	f a known the fault, as delineated the fault, as delineated the fault as the fault Zoning and by the State for the area or based substantial evidence in fault? Refer to Geological Survey sublication 42.	LTS	LTS (IS)	No	No	No	No
ii. Strong se shaking?	ismic ground	LTS	LTS (IS)	No	No	No	No
including l delineated Seismic H issued by	elated ground failure, liquefaction as d on the most recent lazards Zones Map the State Geologist ea or based on other	LTS	LTS (IS)	No	No	No	No

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
substantial evidence of known areas of liquefaction?						
iv. Landslides as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of landslides?	LTS	LTS (IS)	No	No	No	No
b) Result in substantial soil erosion or the loss of topsoil?	LTS	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 onor off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	LTS	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?	LTS	LTS (IS)	No	No	No	No

	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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?	NI	NI (IS)	No	No	No	No

Geology and soils were addressed in the IS prepared for the GP EIR, which found that impacts to this topic would be less than significant following the implementation of the General Plan Update. According to the Safety Element of the General Plan and, as was concluded in the IS, one Alquist-Priolo earthquake fault zone along the Raymond Fault, an active strand of the Sierra Madre Fault, and a possibly active strand of the Sierra Madre Fault pass through the City, and the San Fernando and Whittier Faults are located within 10.5 and 15.5 miles from the City, respectively. All active faults could experience a surface rupture in the lifetimes of development resulting from buildout of the General Plan Update. The Safety Element, California Building Code, the City's Building and Safety Division, and the City Building Code would require all new development to comply with policies and regulations surrounding surface ruptures and would be required to conduct and submit engineering geology and soils reports prior to permit approval. Policies within the above stated regulatory setting would also enforce specific building standards related to seismic ground shaking, as the soil in the City is either sandy, stony, or gravelly loam formed on the alluvial fan adjacent to the San Gabriel Mountains, which are soil types characterized as loose and porous and thus susceptible to seismic ground shaking. Geotechnical investigations would be required for all new development approval as the City contains zones where liquefaction could occur near Arroyo Seco, in the San Rafael Hills, and near Eaton Canyon and Hastings Canyon. State and City building codes contain standards that new development must comply with pertaining to liquefaction as well, which the General Plan Update would be subject to. The geotechnical investigations would also need to cover the potential for landslides and building designs would be required to comply with slope standards, as the City is susceptible to earthquake-induced landslides originating in the San Gabriel Mountains and San Rafael Hills. The IS concluded that natural water soil erosion potential in

Religion Facilities Affordal Housin Ordinan Impac Conclus	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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the City is low, that future construction has the possibility to expose soil to erosion, and that all construction activity would be required to practice soil erosion mitigation practices and adhere to a transport and grading control plan as required by the Los Angeles County Stormwater Program. The above-mentioned threats of landslides and liquefaction in addition to the threat of lateral spreading and/or collapse due to the project location and quality of the soil would need to be included in each geotechnical investigation. Groundwater extraction would be monitored by the Raymond Basin Management Board to ensure the continued prevention of regional subsidence. Finally, each geotechnical investigation would be required to address soil expansion and each project would be required to comply with the associated standards of the Building and Safety Division and California Building Code. As the project area is urbanized, septic tanks would not be utilized during buildout of the General Plan Update. Development would include sewer lateral lines and would not rely on septic tanks or alternative wastewater disposal systems. With adherence to all regulations and policies, submission of a geotechnical report, and implementation of appropriate practices during construction, the IS concluded that buildout of the General Plan Update would have a less than significant impact to geology and soils.

The proposed Religious Facilities with Affordable Housing Ordinance would apply to sites that are located within the City of Pasadena, and thus, were analyzed in the IS and are subject to similar risks and associated potential impacts related to geology and soils. Therefore, implementation of the proposed ordinance would not cause significant impacts beyond those analyzed in the IS for the GP EIR. Additionally, future multi-family residential uses developed pursuant to the proposed Religious Facilities with Affordable Housing Ordinance would be required to adhere to the same regulations, policies, and standards pertaining to geology and soils impacts, both during construction and operation, as any new development in the City would, including the preparation of project-specific geotechnical investigations for individual development projects.

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City of Pasadena, Initial Study/Notice of Preparation, 2013.

Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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VIII. GREENHOUSE GAS EMISSIONS Would the project:	5					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	S-U	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?	LTS	LTS	No	No	No	No

The GP EIR concluded that while certain improvements under the buildout of the General Plan Update would reduce Greenhouse Gas (GHG) emissions per service population, the buildout would still create more GHG emissions than existing conditions and would not achieve long-term GHG reduction goals under Executive Order S-03-05 and target levels of AB 32; after implementing Mitigation Measure 5-1, which required the City to prepare a community climate action plan/greenhouse gas reduction plan, the impacts related to GHG emissions would remain significant and unavoidable. Forecasting tools to measure future emissions from transportation, energy, waste, water/wastewater, and other sources (landscaping equipment, light commercial equipment, and construction equipment) provided a short-term projection for future levels; however, these projections were found to be insufficient given the uncertainty of how the General Plan Update buildout would be phased. The GP EIR found that without implementation of a community climate action/GHG reduction plan and under current state and federal regulations, the population growth that would result from buildout of the General Plan Update would prevent the City from meeting AB 32 targets for emissions. While buildout would improve

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transportation by creating a live/work environment, offering options for alternative and multi-modal mobility, and utilizing energy efficient design and technology, the GP EIR stated that the population growth would still create more emissions than existing conditions. The community climate action plan/greenhouse gas reduction plan would establish community-wide targets, monitoring, and inventory reporting standards. The GP EIR established that the community-wide GHG emissions inventory would be updated every five years, and additional programs would be established to work in conjunction with the initial community climate action plan/greenhouse gas reduction plan (programs specific for building energy, transportation, waste, water, wastewater, agriculture, etc.). The GP EIR concluded that it is uncertain whether buildout would create significant and unavoidable GHG related impacts without knowing the phasing of buildout or what future federal, state, and local programs will exist at the time. The GP EIR found that the General Plan Update would not conflict with the CARB Scoping Plan or the SCAG's 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

The proposed ordinance would add multi-family residential uses as a land use to existing zones analyzed in the GP EIR and establish additional development standards for sites with an established Religious Facility land use that is owned by the Religious Facility. The proposed ordinance would allow for multi-family residential uses and increased intensity in some zones compared to existing conditions; however, the sites the proposed ordinance would apply to would account for a small percentage of sites analyzed under the GP EIR. Any new development pursuant to the proposed Religious Facilities with Affordable Housing Ordinance 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.

The overall purpose of the proposed project is to provide consistency in the allowable uses on sites with religious facilities by implementing a new land use category, Religious Facilities with Affordable Housing, which would help achieve the goals and vision of the General Plan by bridging land uses to serve the community's affordable housing needs and allow for multi-family residential development on existing underutilized religious facility sites and potentially redeveloped sites. The proposed ordinance would support various policies in the General Plan Update that would contribute to reduced GHG emissions, such as the inclusion of higher-density

Issues and Supporting Data Sources: Religious Facilities with Affordable Housing Ordinance Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR? Does the Religious Any New or Changed Circumstances Involving New Significant 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? 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?
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mixed use neighborhoods. Nonetheless, similar to the impacts addressed in the GP EIR, it is likely that impacts related to GHG emissions from the buildout of the sites associated with the proposed Religious Facilities with Affordable Housing Ordinance would be less than significant for each individual project (and will be analyzed on a project-by-project basis), but that the magnitude of future buildout would result in a substantial increase in GHG emissions within the City that is significant and unavoidable.

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IX.	HAZARDS AND HAZARDOUS MA Would the project:	ATERIALS					
a)		LTS	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?	LTS	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?	LTS	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?	LTS	LTS	No	No	No	No

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

Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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The GP EIR found that buildout in accordance with the General Plan Update would involve the transport, use, and/or disposal of hazardous materials; however, impacts would be less than significant as construction would be short-term and in compliance with all California Health and Safety Code, Occupational Safety and Health Administration (OSHA), and SCAQMD regulations; project operations would reduce industrial uses compared to existing conditions and all new development would comply with the City's Safety Element. The GP EIR found that 844 hazardous material sites fall within the City or within a 0.25-mile radius thereof; however, compliance with the Comprehensive Environmental Response, Compensation and Liability Act, Resource Conservation and Recovery Act, 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 would bring the impact level to less than significant. The GP EIR concluded that project development could affect the implementation of an emergency response or evacuation plan due to population growth, development intensity, and road closures during construction; however, coordination with the Pasadena Fire Department (PFD) and compliance with the Los Angeles County Operational Area Emergency Response Plan and the City's Emergency Operation Plan would ensure each project and buildout of the General Plan Update has a less than significant impact related to this topic. Finally, the GP EIR found that areas of the city near very high fire hazard severity zones could expose structures and/or residences to fire hazards during buildout of the General Plan Update. However, compliance with the International Fire Code, California Fire Code, and the City's Safety Element would ensure that future development under the General Plan Update would not expose people or structures to substantial wildfire hazards, and impacts would be less than significant. The IS prepared for the GP EIR found that no portion of the City is located within an airport land use plan or within two miles of an airport, and no related impact would occur. Furthermore, the IS prepared for the GP EIR concluded that the General Plan Update would not allow development of buildings with increased height that affect flight patterns or pose a safety hazard, and any related impacts would be less than significant.

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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Similar to the buildout analyzed in the GP EIR, construction of future projects developed pursuant to the proposed Religious Facilities with Affordable Housing Ordinance could potentially involve the transport, use, and/or disposal of hazardous materials. Additionally, construction associated with individual projects developed pursuant to the proposed Religious Facilities with Affordable Housing Ordinance would be temporary in nature, and all development would comply with the California Health and Safety Code, OSHA, and SCAQMD regulations. Similar to the GP Update analyzed in the GP EIR, impacts resulting from implementation of the proposed Religious Facilities with Affordable Housing Ordinance would be less than significant as construction would be short-term and in compliance with all California Health and Safety Code, OSHA, and SCAQMD regulations. Although the proposed ordinance would allow future multi-family residential uses associated with religious facilities in the East Colorado Specific Plan in a zone designated for General Industrial uses, operations of the Religious Housing would not include industrial uses, which are the land uses typically associated with hazards and hazardous materials. Nonetheless, as discussed in the GP EIR, the City has ordinances regulating hazardous materials and the General Plan 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. The GP EIR includes hazardous material sites within the City, including sites that the proposed ordinance would apply to;8 however, future development would be required to comply with the Comprehensive Environmental Response, Compensation and Liability Act, Resource Conservation and Recovery Act, 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, and as a result any related impacts would be less than significant.

Future development pursuant to the proposed Religious Facilities with Affordable Housing Ordinance could result in temporary road closures. Similar to the GP Update analyzed in the GP EIR, all future development pursuant to the proposed Religious Facilities with Affordable Housing Ordinance would be required to coordinate with the PFD. Additionally, future development pursuant to the proposed Religious Facilities with Affordable Housing Ordinance would not interfere with the Los Angeles County Operational Area Emergency Response Plan or the City's Emergency Operation Plan. Furthermore, no future development project would be permitted to block any

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⁸ City of Pasadena. 2015 General Plan EIR. Table 5.6-3: EnviroStor Active and Inactive (Needs Evaluation) Cases in Pasadena

Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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designated evacuation routes. Therefore, similar to the GP EIR, the proposed Religious Facilities with Affordable Housing Ordinance is not expected to significantly affect the implementation of an emergency response or evacuation plan.

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. The proposed Religious Facilities with Affordable Housing Ordinance would apply to some sites in the western portion of the City that are located within lands classified as Very High Fire Hazard Severity Zones. Similar to the GP EIR, compliance with the International Fire Code, California Fire Code, and the City's Safety Element would ensure that future development pursuant to the proposed Religious Facilities with Affordable Housing Ordinance would not expose people or structures to substantial wildfire hazards, and impacts would be less than significant.

	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?	
X.	X. HYDROLOGY AND WATER QUALITY Would the project:							
a)	Violate any water quality standards or waste discharge requirements?	LTS	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)?	LTS	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?	LTS	LTS	No	No	No	No	

	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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?	LTS	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?	LTS	LTS	No	No	No	No
f)	Otherwise substantially degrade water quality?	LTS	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?	LTS	LTS	No	No	No	No

	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
h)	Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	NI	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?	LTS	LTS	No	No	No	No
j)	Inundation by seiche, tsunami, or mudflow?	LTS	LTS	No	No	No	No

The GP EIR found that buildout of the General Plan Update could increase the amount of impervious surfaces in the City of Pasadena resulting in an increase in surface water flows into drainage systems within the watershed, potentially resulting in erosion, siltation, and/or flooding. However, the city is primarily developed and urbanized, and all development would be required to adhere to applicable local, state, and federal regulations and standards. All Religious Facilities with Affordable Housing developments would also be required to implement site-specific design measures, low-impact development, and best management practices (BMPs), including infiltration features that contribute to groundwater recharge and minimize stormwater runoff, erosion, siltation, and/or flooding. As such, these impacts would be less than significant. The GP EIR stated that General Plan Update buildout would not place any housing within the dam inundation zone of Devil's Gate Dam but would involve some increase in residential density in areas within the dam inundation zone for Eaton Wash Dam. The Religious Facilities with Affordable Housing Ordinance would result in an increase in residential density on several sites within the dam inundation zone for Eaton Wash Dam; however, the limited water supply behind the Eaton Wash Dam

Issues and Supporting Data Sources: Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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combined with the implementation of evacuation plans as required by the City's Safety Element would make the impact to risk of loss, injury, or death in the case of dam failure less than significant. The GP EIR found that during the construction phases of projects developed under the General Plan Update, there is the potential for short-term unquantifiable increases in storm water pollutant concentrations; and during operation of such projects, the quality of storm runoff (sediment, nutrients, metals, pesticides, pathogens, and hydrocarbons) may be altered. Accordingly, Religious Facilities with Affordable Housing would be required to fully comply with applicable local, state, and federal regulations reducing water quality impacts associated with construction and operational impacts related to stormwater pollution and water quality to less than significant levels. While the GP EIR found that portions of the City are susceptible to inundation by mudflows, none of the proposed development under the General Plan Update fell within these susceptible areas, and the impact was found to be less than significant. The IS prepared for the GP EIR found that no portions of the City of Pasadena are located within a 100-year floodplain and, therefore, no impact related to floodplains would occur.

All new Religious Facilities with Affordable Housing developments would be subject to applicable local, state, and federal regulations and standards pertaining to water quality, wastewater, and hydraulic hazard risk reduction. Impacts to hydrology and water quality would be less than significant. Furthermore, as indicated in the IS prepared for the General Plan, no portion of the City is located within a 100-year floodplain. Therefore, Religious Facilities with Affordable Housing developments would not place structures within the flow of a 100-year flood and no impact would occur.

The current CEQA Guidelines Appendix G checklist also recommends considering a project's potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. As previously discussed, all new Religious Facilities with Affordable Housing developments would be subject to all applicable water quality regulations. Additionally, no such developments would include the extraction of groundwater. Therefore, the proposed Religious Facilities with Affordable Housing developments would not conflict with the implementation of a water quality control plan or sustainable groundwater management plan, and the impact would be less than significant.

Issues and Supporting Data Sources: Fac Af P	Religious cilities with ffordable Housing ordinance Impact onclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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W.	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
XI.	LAND USE AND PLANNING Would the project:						
a)	Physically divide an established community?	LTS	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?	LTS	LTS	No	No	No	No
c)	Conflict with any applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP)?	NI	NI (IS)	No	No	No	No

The IS prepared for the GP EIR found that land use changes proposed within the specific plan areas are intended to tie into the existing uses and surrounding neighborhoods. As such, the General Plan Update would not physically divide an existing community and the impact would be less than significant. The GP EIR compared the General Plan Update's proposed land use changes—including proposed net increases in development and new policies pertaining to building intensity and urban design—to existing land uses in the City and concluded that possible direct impacts to land use and planning would be less than significant. As found by the GP EIR

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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and in accordance with California Government Code Section 65302, the General Plan Update would address two of the seven required Elements: Land Use and Mobility. The GP EIR also found that the General Plan Update would be consistent with the SCAG RTP/SCS, as is required. It was concluded that implementation of the General Plan Update could result in a net increase of 12,312 additional residential dwelling units and 10,988,959 square feet of nonresidential uses; this net increase would be framed and regulated by the goals and policies of the City's Land Use and Mobility Elements, which accommodate growth through 2035. Changes to prior land use designations proposed by the General Plan Update primarily allowed for more mixed-use and redevelopment of existing industrial uses for more integrated non-residential land uses that would foster local goods and services and business in the City. Buildout capacity would be limited by the following standards for density (du/ac) and FAR: commercial uses with FARs between 0.0 and 3.0; Research and Development designations (which would replace Industrial designation) with FARs of 0.9 and 0.0-1.25, respectively; Low Mixed Use (0.0–1.0 FAR, 0–32 du/ac), Low Medium Mixed Use (0.0–1.75 FAR, 0–48 du/ac), Medium Mixed Use (0.0–2.25 FAR, 0-87 du/ac), and High Mixed Use (0.0-3.0 FAR, 0-87 du/ac). The GP EIR concluded that modifying land use designations and the corresponding buildout would create a positive live/work environment, which would enhance quality of life while reducing environmental impacts related to consumption, pollution, and emissions due to transit orientation, reduced commutes, and improved multi-modal options. Moreover, the GP EIR found that additional goals and policies added to the Land Use and Mobility Elements by the General Plan Update would ensure new development would be compatible with the existing character of the City while enhancing urban design and regulating sustainable growth. The GP EIR stated that in addition to the goals and policies of the Land Use and Mobility Elements, all new development would also be required to comply with Title 17 of the City's Municipal Code and applicable design guidelines. The GP EIR stated that additional environmental impacts from changes to land use patterns and building intensity and design, such as impacts to air quality, hazards, flooding, and traffic, would be addressed individually in each corresponding section. As such, the GP EIR found that the proposed updates would not conflict with any existing applicable policies or regulations and would be implemented in such a way that creates compatibility within the plan area; impacts to land use and planning were determined to be less than significant in the GP EIR. Additionally, the IS prepared for the GP EIR found that there are no adopted habitat conservation or natural

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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community conservation plans within the City and, as such, concluded that no impacts to such plans would result from the General Plan Update.

As described above, the proposed Religious Facilities with Affordable Housing Ordinance would permit Religious Facilities with Affordable Housing in the zones listed in Table 1 in Section 2.4.2, including those designated as PS (Public, Semi-Public), CG (General Commercial), CO (Commercial Office), CL (Limited Commercial) and specific zones in the Central District Specific Plan, East Colorado Specific Plan, Fair Oaks/Orange Grove Specific Plan, East Pasadena Specific Plan, North Lake Specific Plan, and Lincoln Avenue Specific Plan areas. As the permitted development would occur within existing urban areas and infill sites, the proposed ordinance would not physically divide an established community. In addition, as indicated in the IS prepared for the GP, there are no adopted habitat conservation or natural community conservation plans within the City. Therefore, the proposed ordinance would not result in impacts to such plans.

The proposed Religious Facilities with Affordable Housing Ordinance would help achieve the goals and vision of the General Plan by bridging land uses to serve the community's housing demand, including demand for affordable housing, and allow for multi-family residential development on existing underutilized religious facility sites and potentially redeveloped sites. As discussed above, the proposed ordinance would allow up to 32 du/ac and a maximum of 75 dwelling units without a Density Bonus. However, with the approval of a Minor Conditional Use Permit, Religious Housing developments would be allowed to exceed 75 dwelling units. Under existing conditions, there are approximately 15 religious facilities which are located within zones that do not currently allow multi-family housing and a religious facility. Allowing for housing on religious facility sites as well as others within the PS (Public, Semi-Public), CG (General Commercial), CL (Limited Commercial) and CO (Commercial Office) zones would support Goal 1 of the Land Use Element in that the proposed ordinance would provide growth and change within targeted areas that makes efficient use of land. In addition, the proposed ordinance would allow for higher density development in urban core settings and in close proximity to transit that provides for the needs of existing and future residents and businesses.

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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The proposed ordinance is consistent with General Plan Land Use Element Policy 2.1, in that it would provide additional opportunities for a full range of housing types, densities, locations, and affordability levels to address the community's fair share of regional, senior, and workforce housing needs. Accordingly, the proposed ordinance would also be consistent with Policy 21.1 to provide a variety of housing types, styles, and affordability levels that are accessible to and meet preferences for different neighborhood types and income levels pursuant to the Housing Element. Policy 4.11 requires that developments demonstrate a contextual relationship with neighboring structures with regard to building scale, massing, orientation, setbacks, buffering, etc. The proposed ordinance would be consistent with this policy as it also requires housing developments on religious facility sites to comply with development standards (setbacks, height, FAR) of the underlying zone district, in conjunction with the community space requirements of the Mixed Use Development Standards (Pasadena Municipal Code Section 17.50.160.H), or other development standards of the least restrictive adjacent zone. Moreover, all multi-family housing developments with three or more units on religious facility sites would be subject to design review and approval by the City. With regard to Goal 19 and supply of parking, the proposed ordinance would allow parking requirements for the existing, or proposed, religious facility, to be reduced up to 50 percent and shared with the Religious Housing component, which would incentivize walking, biking, and use of transit.

In addition, the General Plan provides goals and policies for ten identified community places within the City. Goal 31 of the Land Use Element describes the Central District community place as the primary civic, business, financial, retail, entertainment, and cultural center of Pasadena that includes housing and enables residents to live close and walk to these uses and access regional transit. The proposed ordinance would support this goal by permitting additional housing opportunities within the Lake Avenue and Arroyo Corridor/Fair Oaks sub-districts. With a minimum requirement of affordable units for such housing, the proposed ordinance would also support Policy 31.9 to provide a wide variety of housing options in terms of type, location, size, and price. Goal 32 of the Land Use Element describes the East Colorado community place as an area to be transformed from largely auto-oriented strip uses to a series of pedestrian-oriented villages and districts with unique identities. The proposed ordinance would support this goal by permitting additional housing within the Lamanda and Chihuahuita sub-areas, which would contribute to pedestrian-oriented developments in proximity to a mix of uses, amenities, and streetscapes. Goal 33 of the Land Use Element describes the East Pasadena community

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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place as a semi-urban environment with higher-density mixed-use developments incorporating retail, office and housing uses to provide increased opportunities encourage transit use and walking. The proposed ordinance would support this goal by permitting additional housing near the Sierra Madre Villa Metro L (Gold) Line station, which would also support Policies 33.1 and 33.2 to concentrate development and multi-family housing adjoining the station and contributing to reductions in vehicle trips, energy consumption, and GHG emissions. Goal 34 of the Land Use Element describes the Fair Oaks and Orange Grove community place as distinct pedestrian-oriented villages containing a mix of commercial and housing uses. Policy 34.3 requires that the types of uses, densities, building massing and heights, and design development along Fair Oaks Avenue and Orange Grove Boulevard assure compatibility and accessibility with adjoining residential neighborhoods. Implementation of the proposed ordinance would add to the housing supply and subject the Religious Housing to the development standards (including those for setbacks, height, FAR) of the underlying zoning district, in conjunction with the community space requirements of the Mixed Use Development Standards (Pasadena Municipal Code Section 17.50.160.H), or the least restrictive adjacent zone, which would support continuity of existing neighborhood features. As such, the proposed ordinance would not conflict with this goal and policy. Goal 36 of the Land Use Element describes the North Lake community place as a well-designed and attractive corridor supporting multiple travel modes including transit, bicycling, and walking with clusters of distinctive places for shopping, dining, and living. Policy 36.4 requires that the types of use and location, scale, and design of development buffer commercial and mixed-use development on Lake Avenue from adjoining lower density residential neighborhoods. Policy 36.5 protects low and low-medium density residential areas north of Orange Grove Boulevard, which contain recognized historic properties and districts, from the development of mixed use or residential projects by requiring appropriate transitional heights. As discussed above, the proposed ordinance would subject Religious Housing to the development standards of the underlying zoning district, in conjunction with the community space requirements of the Mixed Use Development Standards (Pasadena Municipal Code Section 17.50.160.H), or the least restrictive adjacent zone. Therefore, the proposed ordinance would not conflict with this goal and policies. Goal 35 of the Land Use Element describes the Lincoln Avenue community place as a vibrant neighborhood-oriented district, with new housing options and a complement of local-serving retail and service businesses, office spaces, and community uses, all tied together with public improvements that create a vibrant and enjoyable pedestrian environment. Policy 35.2 highlights new opportunities for all types of housing along the corridor that are located, scaled, and designed to assure

Religious Facilities with Affordable Housing Ordinance Impact Conclusion GP EIR Impact Conclusion Facilities with Affordable Housing Ordinance Impact Conclusion Facilities with Affordable Housing Ordinance Involve New Significant Impacts or Substantial Importance That Was Not and Could Not Have Significant Impacts or Substantial Importance That Was Not and Could Not Have Significant Impacts or Substantial Importance That Was Not and Could Not Have Significant Impacts or Substantial Importance That Was Not and Could Not Have Significant Impacts or Substantial Importance That Was Not and Could Not Have Significant Impacts or Substantial Importance That Was Not and Could Not Have Significant Impacts or Substantial Importance That Was Not and Could Not Have Required for Substantial Importance That Was Not and Could Not Have Required for Substantial Importance That Was Not and Could Not Have Significant Impacts or Substantial Importance That Was Not and Could Not Have Religious Facilities Affordable Housing Affordable Level of	Issues and Supporting Data Sources: Facilities with Affordable Housing Ordinance Impact Conclusion	Affordable Housing Ordinance Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed Changed Circumstan Involving N Significan Impacts of Substantia More Severe Impacts than the GP E	Importance That Ces Was Not and ew Could Not Have or Been Known at or the Time of Illy Certification of re the GP EIR that an Rises to the Level of IR? Requiring New Analysis or Mitigation Measures Required for the Required for the Afficial with Affordable Housing Ordinance?
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compatibility with and preserve neighboring single-family residential uses. The proposed ordinance would permit additional housing opportunities within the southeastern portion of Lincoln Avenue area and as discussed above, subject the Religious Housing to the development standards of the underlying zoning district, in conjunction with the community space requirements of the Mixed Use Development Standards (Pasadena Municipal Code Section 17.50.160.H), or the least restrictive adjacent zone, which would support continuity of existing neighborhood features. As such, the proposed ordinance would not conflict with this goal and policy.

As described above, the proposed ordinance would introduce housing in areas near transit and the limited proposed parking would encourage walking, biking, and taking transit. The proposed ordinance would support the goals set forth in the Land Use and Mobility Elements as well as the objectives presented in the GP EIR. The aggregate residential housing that could result from the proposed ordinance would not exceed the buildout analyzed in the GP EIR, nor would it conflict with Title 17 of the City's Municipal Code, California Government Code Section 65302, or SCAG's RTP/SCS. Therefore, the proposed ordinance 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:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
XII	. MINERAL RESOURCES Would the project:						
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	NI	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?	NI	NI (IS)	No	No	No	No

Discussion:

Mineral resources were addressed in the IS prepared for the GP EIR, which found that impacts in this topic would be less than significant following the implementation of the General Plan Update. The IS states that there is no active mining in the City. Based on the California Geological Survey and as stated in the IS, the Eaton Wash and Arroyo Seco Wash are classified as Mineral Resource Sectors and may contain mineral resources within the City, but neither contain active mines or reserves, and buildout of the General Plan Update would not result in development in either area. Additionally, there are no mineral resource recovery sites in the City. The IS concluded that there would be no impact to mineral resources following implementation of the General Plan Update. As the Religious Facilities with Affordable Housing developments would occur within the same boundaries as those analyzed in the GP EIR and it is not located

⁹ City of Pasadena, Initial Study/Notice of Preparation, 2013.

Issues and Supporting Data Sources: Religious Facilities with Affordable Housing Ordinance Impact Conclusion Conclusion	Does the Religious Facilities with Affordable Housing Ordinance Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the	ny New lation sures red for ligious es with dable sing ance?
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within any of the identified Mineral Resource Sectors, the developments would not contain mineral resources or develop on Mineral Resource Sectors.

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:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
XII	I. NOISE Would the project result in:						
a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	LTS	LTS	No	No	No	No
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	S-U	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?	LTS	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?	S-U	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	NI	NI (IS)	No	No	No	No

	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
	or public use airport, would the project expose people residing or working in the project area to excessive noise levels?						
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?	LTS	LTS (IS)	No	No	No	No

Discussion:

The GP EIR analyzed impacts to 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. The GP EIR assessed the updates for compatibility with the City's Land Use and Noise Elements. The GP EIR concluded that increased stationary and traffic noises from buildout would have a less than significant impact; if residential and sensitive land uses continue to be developed in compatible areas, and those uses that are compatible with transportation noises are developed in compliance with the Noise and Land Use Elements, as well as other state and local regulations pertaining to noise, then this impact would be less than significant as well. Regarding exposure to long-term groundborne vibration, the GP EIR found that both rail and industrial uses could cause a potentially significant impact. Portions of the City are designated for and operate as industrial uses. Mitigation Measure 9-1 requires all industrial projects to submit a vibration study providing evidence that vibration-causing activity would not exceed levels set forth by the Federal Transit Administration (FTA). The City of Pasadena is served by the Metro L (Gold) Line. The portion of this line in the City runs north-south parallel to Arroyo Parkway and then turns to an east-west orientation along I-210, with its current terminus in the City of Azusa. Mitigation Measure 9-2 requires all new development within screening distance of the L (Gold) Line to submit a study conducted by an acoustical engineer to the City's Planning Division that demonstrates vibration impacts and possible reduction measures. Implementation of Mitigation Measures 9-1

Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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and 9-2 would reduce groundborne vibration impacts to a less than significant level. The GP EIR concluded that short-term impacts from construction vibration would be significant and unavoidable for buildout of the General Plan Update; Mitigation Measure 9-3 would reduce impacts to sensitive receptors within 25 feet of activity by substituting less intensive equipment when possible and utilizing vibration reduction techniques; however, because each new development involved in the buildout is project-specific, the GP EIR determined it is not possible to mitigate this impact below a significant and unavoidable level. Mitigation Measure 9-4 further addresses vibrations from construction on sensitive architectural structures within 25 feet of activity; yet, similar to construction vibration impacts to sensitive receptors, this impact would remain significant and unavoidable in the context of total buildout as each project would present individual circumstances. Mitigation Measure 9-5 requires all construction permits be issued only after submission of a plan for noise and vibration reducing BMPs for all development within 500 feet of a noise-sensitive receptor; still, the GP EIR concluded that this mitigation measure would not reduce the impacts of construction activities to a less than significant level as the phasing, location, and magnitude of future development under buildout is unknown. Therefore, the GP EIR concluded that construction related noise impacts are significant and unavoidable. The IS prepared for the GP EIR found that no portion of the City is located within an airport land use plan or within two miles of an airport, and no impact would occur. Furthermore, the IS prepared for the GP EIR concluded that noise from helicopter flights would be periodic and, thus, the impact resulting from noise from private use heliports would be less than significant.

Buildout of Religious Facilities with Affordable Housing could have potentially significant noise impacts due to construction-related noise and vibration, as the phasing and specific sites of future developments are currently unknown. However, similar to the updates analyzed under the GP EIR, the Religious Facilities with Affordable Housing developments would 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 criteria and that BMPs are utilized throughout the construction phase of each future development project. As the proposed Religious Facilities with Affordable Housing Ordinance would allow development of multi-family residential uses within the zone designated as EPSP-d1-IG (East Pasadena Specific Plan, subarea d1, Industrial General District), the proposed ordinance could potentially expose sensitive uses to strong levels of long-term groundborne vibration from train and industrial use operations within the EPSP-d1-IG zone.

Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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As such, Religious Facilities with Affordable Housing developments within the EPSP-d1-IG zone would implement GP EIR Mitigation Measure 9-2 to assess vibration impacts from rail use and implement reduction measures. As indicated in the IS prepared for the GP, there are no airports within two miles of the City. Therefore, the proposed Religious Facilities with Affordable Housing developments would not result in noise impacts related to an airport land use plan or public airport. Furthermore, similar to the General Plan Update, helicopter flights within zones proposed for potential Religious Facilities with Affordable Housing developments would be periodic; as such, developments would have no effect on helicopter usage or flight patterns and would cause no new helicopter noise impacts.

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:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
XIV. POPULATION AND HOUSING Would the project:						
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)?	LTS	LTS	No	No	No	No
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	LTS	LTS (IS)	No	No	No	No
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	LTS	LTS (IS)	No	No	No	No

Discussion:

The GP EIR concluded that while population, housing, and employment growth induced by buildout of the General Plan update would likely surpass SCAG's forecast, the impact of buildout would be less than significant. The General Plan Update accommodates growth in all sectors; it permits new housing opportunities, and it opens more opportunities for employment. The GP EIR found that the Citywide utilities and infrastructure required to service the projected buildout population would be sufficient, and each service is discussed in more detail within its individual section of this document (i.e., Hydrology and Water Quality, Public Services, Transportation and

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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Traffic, Utilities and Service Systems). One of the central objectives of the General Plan Update is to create a housing/job balance within a more work/live environment; the GP EIR found that buildout would achieve this goal, which would offset the detrimental impacts that growth would have. The IS prepared for the GP EIR found that the General Plan Update would increase the number of dwelling units by allowing higher intensity residential uses and mixed-use development and that growth in accordance with the proposed General Plan Update was not expected to displace existing housing or people, as the General Plan Update would increase the number of dwelling units by allowing higher intensity residential uses and mixed-use development. Therefore, the IS concluded that the impacts related to displacement of housing and people would be less than significant.

As described in the GP EIR, the General Plan Update also assumes a reasonable number of affordable units will be built beyond the development projections. Since the GP EIR was certified, more opportunities for the development of residential uses, including affordable housing, have been identified, which would support the objectives of the General Plan to create a housing/job balance within a more work/live environment. The Religious Facilities with Affordable Housing Ordinance would allow for multi-family residential developments to be built alongside religious facilities within a limited number of zones that currently do not allow housing. As previously described, the proposed ordinance proposes density and affordability criteria for such developments. The proposed ordinance would allow up to 32 du/ac and a maximum of 75 dwelling units without a Density Bonus. However, with the approval of a Minor Conditional Use Permit, Religious Housing developments would be allowed to exceed 75 dwelling units. Under existing conditions, there are 15 religious facility sites in the City which are located within zones that do not currently allow housing. As the GP EIR already considers a reasonable number of affordable units will be built, the buildout of Religious Facilities with Affordable Housing within the identified zones would not exceed the projected growth analyzed in GP EIR. Therefore, similar to the GP EIR, the Religious Facilities with Affordable Housing Ordinance would not displace substantial numbers of housing or people, and the impacts would be less than significant.

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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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.

Religious Facilities with Affordable Housing Ordinance Impact Conclusion Religious Facilities with Affordable Housing Ordinance Impact Conclusion Religious Facilities with Affordable Housing Ordinance Impacts or Substantial Importance That Was Not and Could Not Have Significant Impacts or Substantial Importance That Was Not and Could Not Have Significant Impacts or Substantial Importance That Was Not and Could Not Have Significant Impacts or Substantial Importance That Was Not and Could Not Have Significant Impacts or Substantial Importance That Was Not and Could Not Have Significant Impacts or Substantial Importance That Was Not and Could Not Have Significant Impacts or Substantial Importance That Was Not and Could Not Have Significant Impacts or Substantial Importance That Was Not and Could Not Have Significant Impacts or Substantial Importance That Was Not and Could Not Have Religious Facilities With Affordable the Time of Certification of the GP EIR Impact the Time of Certification of the GP EIR Impact the Time of Certification of the GP EIR Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR Importance Involving New Significant Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR Impacts the Time of Certification of the GP EIR? Any New or Changed Circumstances Involving New Significant Impacts or Substantially Nore Severe Impacts than those analyzed in the GP EIR?

XV. PUBLIC SERVICES

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:

a) Fire protection?	LTS	LTS	No	No	No	No
b) Police Protection?	LTS	LTS	No	No	No	No
c) Schools?	LTS	LTS	No	No	No	No
d) Libraries?	LTS	LTS	No	No	No	No

Discussion:

The General Plan Update area is within the City of Pasadena and is serviced by the PFD, Pasadena Police Department (PPD), Pasadena Unified School District (PUSD), and the Pasadena Public Library (PPL). The PFD operates eight stations throughout the City, with an average daily staff of 51. The GP EIR found that, while population growth and increased infrastructure from buildout of the General Plan Update would result in higher demand for service from the PFD and possibly require new or expanded facilities, compliance with existing regulations and coordination during road closures related to future construction would ensure impacts remain less than significant. The PPD aims to employ 1.63 officers per capita and 0.72 officers per 1,000 residents. The GP EIR found that, while population growth and increased infrastructure from buildout of the General Plan Update would result in higher demand for service from the PPD and possibly require new or expanded facilities, compliance with existing regulations would ensure impacts remain less than significant. The GP EIR concluded that while population growth from buildout of the General Plan Update would create new students in the population, it is unlikely that forecasted growth would exceed the capacity of existing facilities; additionally, per SB 50, all new development in the City is subject to a School Impact Fee to ensure that school services continue to meet the needs of the population. The PPL operates 10 facilities, all within 1 mile or walking distance of each residence. The GP EIR found that while

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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buildout of the General Plan update would induce population growth, the estimated growth would not exceed the PPL's capacity to serve the community; additionally, all new development is subject to fees and taxes that fund public services, including a Library Special Tax, to ensure continued funding for the PPL. The GP EIR concluded that all impacts to public services would be less than significant.

As described in the GP EIR, buildout of the General Plan Update assumes a reasonable number of affordable units will be built beyond the development projections. The Religious Facilities with Affordable Housing Ordinance would allow for multi-family residential developments to be built alongside religious facilities within a limited number of zones that currently do not allow housing. As the GP EIR already considers a reasonable number of affordable units will be built, the buildout of Religious Facilities with Affordable Housing within the identified zones would not exceed the projected growth analyzed in the GP EIR. Furthermore, the City would continue to fund police and fire protection services through the general fund, and each Religious Facilities with Affordable Housing development would be required to comply with existing regulations related to safety, design, and development fees, as described above. Therefore, the Religious Facilities with Affordable Housing Ordinance would not be anticipated to increase demand for public services beyond the level analyzed in the GP EIR and found to have less than significant 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 would not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.

	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
XV	I. RECREATION Would the project:	l				l	
a)	• • • • • • • • • • • • • • • • • • • •	LTS	LTS	No	No	No	No
b)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	LTS	LTS	No	No	No	No
c)	Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might	LTS	LTS	No	No	No	No

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
have an adverse physical effect on the environment?						

Discussion:

The City's Municipal Code does not dictate a resident/acreage ratio for parkland and open space. While buildout of the General Plan Update would induce population growth and likely increase demand for parkland and open space and potentially result in the deterioration of existing facilities, the GP EIR found that improvements to existing and development of new open space and recreation amenities included in buildout, in conjunction with the Residential Impact Fee that each new development would be subject to as well as other in-lieu fees, impacts would be less than significant. The GP EIR concluded that the increase in population projected by buildout of the General Plan Update would increase demand for parkland, open space, and recreational facilities; increased use could deteriorate existing facilities or require the development of additional facilities. The GP EIR found that land uses permitting parkland, open space, and recreational activities would not be converted and that there would be opportunities for additional facilities to be built. All residential development under the buildout of the GP Update would be required to pay a Residential Impact Fee; any type of project that acquires open space would also be subject to in-lieu fees. As such, the GP EIR found that impacts to recreation would be less than significant with adherence to existing regulations, including payment of applicable fees.

The Religious Facilities with Affordable Housing Ordinance would allow for multi-family residential developments to be built alongside religious facilities within a limited number of zones that currently do not allow housing. The proposed ordinance would require such developments in the PS (Public/Semi-Public) zoning district and commercial zones, where multi-family housing is not a permitted use, to provide 150 square feet of community space per dwelling unit. In addition, similar to future development projects under the GP EIR, each Religious Facilities with Affordable Housing development 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. No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise,

Issues and Supporting Data Sources: Religious Facilities with Affordable Housing Ordinance Impact Conclusion GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR? Any New C Changed Circumstant Involving N Significant Impacts of Substantial More Severe Impacts than those analyzed in the GP EIR?	Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that n Rises to the Level of Mitigation Measures Required for the Religious Facilities with Affordable Housing
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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:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
XV	II. TRANSPORTATION/TRAFFIC Would the project:						
a)	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	LTS-M(GP)	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?	LTS	S-U	No	No	No	No

	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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?	NI	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)?	LTS	LTS	No	No	No	No
e)	Result in inadequate emergency access?	LTS	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?	LTS-M(GP)	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. The GP EIR concluded that implementation of the General Plan Update would not conflict with the City's plans, ordinances, or policies establishing measures of effectiveness for the

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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performance of the complete circulation system, and would comply with adopted policies, plans, and programs for alternative transportation. It found that transportation performance would improve, and pedestrian and bicycle accessibility would increase from buildout of the General Plan Update, which would satisfy Mobility Plan goals around livability, non-motorized transit, and economic viability. The GP EIR stated that all improvements within the City are funded through the City's transportation fee program with the exception of bicycle and pedestrian improvements. The proposed General Plan Update included Policy 2.10, requiring the City to amend the existing transportation impact fee to include pedestrian and bicycle improvements. The GP EIR concluded that without full funding of circulation improvements, the General Plan Update would result in a significant impact. As such, Mitigation Measure 13-1 was identified in the GP EIR, which required the City to update the transportation impact fee program in place at the time the GP EIR was prepared by 2020 to ensure that impacts to traffic and transportation resulting from buildout of the General Plan Update remain less than significant. The City implemented Mitigation Measure 13-1 and updated the transportation impact free program, as mandated by AB 1600 legislation, as codified by California Code Government Section 66000 et seq.

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 project impact at the intersection of Pasadena Avenue at California Boulevard during the AM peak hour; impacts at all other intersections under Metro's Congestion Management Program (CMP) would be less than significant. The GP EIR also identified significant impacts at two CMP Freeway Mainline Segments on Interstate 210. The GP EIR concluded that there was no feasible mitigation to reduce CMP impacts to a less than significant level, as improvements to road capacity would require changes to road infrastructure, which would have secondary impacts such as loss of bicycle lanes, parking, sidewalk space, etc., that would conflict with General Plan goals and policies and would cause other impacts to traffic and transportation. As such, this impact was determined to be significant and unavoidable.

Finally, 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 IS prepared for the GP EIR found

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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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.

The Religious Facilities with Affordable Housing Ordinance would permit multi-family residential units to be developed within specific zones that currently do not permit residential uses. The proposed ordinance would not include modifications to roadways and infrastructure. Nonetheless, the developments that would be permitted by the proposed ordinance could contribute to circulation improvements by improving proximity to live/work/shop for residents and allowing more residential development in close proximity to public transportation. Further, each project developed under the proposed ordinance would be subject to whatever transportation impact fee is in effect at the time of permitting, per GP EIR Mitigation Measure 13-1, which would ensure improvements continue. As such, impacts from the proposed ordinance related to proximity and quality of bicycle networks, proximity and quality of transit networks, and pedestrian accessibility would be less than significant. In addition, the developments permitted by the proposed ordinance would be residential in nature and built alongside religious facilities within developed areas; thus, such residential uses would not be incompatible uses. Furthermore, proper design and City review and approval of such projects would not result in substantially increased hazards or inadequate emergency access. Since the publication of the GP EIR, the Los Angeles County CMP has been dissolved. Additionally, as indicated in the IS prepared for the GP EIR, there are no airports within two miles of the City. Therefore, the proposed ordinance would not affect air traffic patterns and no impact would occur.

The current CEQA Guidelines Appendix G checklist also recommends considering a project's potential to conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), which requires the use of VMT as the updated measurement of traffic impacts, replacing the level of service (LOS) method previously used. As discussed, the GP EIR included a City-wide VMT analysis for impacts to traffic and transportation based on calculations for VMT per capita and VT per capita. The analysis used the City of Pasadena Travel Demand Forecasting (TDF) Model, which was validated to 2013 traffic conditions and later updated to reflect 2017 conditions. Both the 2013 and 2017 models assumed that the I-710 extension would be construction by 2035, which is no longer a valid assumption.

Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
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As such, an assessment was conducted to update the model to reflect the 2035 horizon year without the I-710 extension. ¹⁰ This assessment concluded that there were no substantial deviations from the VMT and VT analyses with the removal of the I-710 from the model. Thus, both versions of the Pasadena TDF Model are consistent with the changes to the CEQA metrics establishing VMT as the measurement of traffic impacts. The VMT analysis previously prepared for the GP EIR would also be applicable to the proposed ordinance. Further, it should be noted that there is no specific development project identified by the proposed ordinance. Rather, future development projects would implement the land use and design modifications proposed in the proposed ordinance. Future residential development projects consisting of 50 or more dwelling units and non-residential development projects greater than 50,000 square feet in size would be required to include a VMT assessment as part the environmental documentation prepared for that specific project. As such, the proposed ordinance would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and the impact would be 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, 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.

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¹⁰ Pasadena Future Year TDF Model Update and New VMT/VT Metrics Memorandum, Fehr & Peers, October 2020.

	Issues and Supporting Data Sources:	Religious Facilities with Affordable Housing Ordinance Impact Conclusion	GP EIR Impact Conclusion	Does the Religious Facilities with Affordable Housing Ordinance 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 Religious Facilities with Affordable Housing Ordinance?
XV	III. UTILITIES AND SERVICE SYSTE Would the project:	MS					
a)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	LTS	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?	LTS	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?	LTS	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?	LTS	LTS	No	No	No	No

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

Discussion:

The GP EIR found that regarding wastewater treatment and collection, services provided by the Sanitation Districts of Los Angeles County, Los Angeles County Public Works Department, and PWP would adequately manage wastewater generated by buildout of the General Plan Update. Upon implementation of regulatory requirements and standard conditions of approval, such as payment of development fees and implementation of a site-specific Storm Water Pollution Preventions Plan for construction, the impact would be less than significant. Regarding water supply and distribution, the GP EIR found that buildout of the General Plan Update would fall within projections for PWP's capacity; project requirements would be met by current services provided by PWP. Upon implementation

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of regulatory requirements and standard conditions of approval, such as implementation of mandatory conservation measures, requiring the preparation of a Water Supply Assessment for development projects meeting certain size criteria, and requiring affirmative verification of sufficient water supply for certain residential subdivisions pursuant to SB 221, the impact would be less than significant. Regarding solid waste, the GP EIR found that project buildout would be accommodated by existing service providers and facilities. Upon implementation of regulatory requirements and standard conditions of approval, such as the inclusion of storage areas for recyclable materials at future nonresidential and multi-family residential development projects pursuant to AB 341, recycling at least 50 percent of construction and demolition waste pursuant to the California Green Building Code, and solid waste reduction strategies under General Plan Policies 10.2 and 10.4, the impact would be less than significant. Regarding other utilities, including electricity, natural gas, and telecommunications, the GP EIR concluded that future development under the General Plan Update would be accommodated by existing service providers, and the impact would be less than significant. The GP EIR found that the project satisfied and complied with the City's adopted General Plan Open Space and Conservation Element pertaining to water conservation, General Plan Safety Element pertaining to continued earthquake strengthening for utilities and protection of water supply, and state codes and regulations pertaining to utility services, and that the proposed updates to the General Plan Land Use Element regarding energy and water efficiency and conservation and solid waste reduction would create more sustainable standards for the future of the City. The IS prepared for the GP EIR found that buildout of the General Plan Update would be required to comply with all applicable solid waste regulations, including the California Integrated Waste Management Act and the City of Pasadena Zoning Code Section 17.40.120 (Refuse Storage Facilities) and, as such, no impact related to compliance with solid waste regulations would occur.

The specific zones identified by the proposed Religious Facilities with Affordable Housing Ordinance are within the area analyzed by the GP EIR, and the same service providers would manage utility services for the future residential development projects within the proposed ordinance's zones. The potential growth from Religious Housing within zones identified by the proposed ordinance would not exceed the projected growth analyzed in the GP EIR. Therefore, the proposed ordinance is not anticipated to result in an exceedance of the capacity of existing utility facilities, and no new or expanded facilities are anticipated to be needed to service buildout of the proposed ordinance's zones. Similar to the General Plan Update, future residential projects implemented under the proposed

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ordinance would be required to adhere to all applicable solid waste regulations. Therefore, implementation of the proposed ordinance 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 future residential projects under the proposed ordinance. As discussed, the zones permitted by the proposed ordinance are primarily built out under existing conditions. Thus, it is anticipated that any new development in the permitted zones would require lateral connections to mainlines in coordination with utility service providers, similar to what occurs under existing conditions. Therefore, the proposed ordinance 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.

Environmental Determination

Based upon the evidence in light of the whole record documented in the attached environmental checklist explanation, cited incorporations and attachments, the City finds 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. \boxtimes 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 (Negative Declaration or EIR) pursuant to CEQA Guidelines Sections 15162 through 15163. Prepared By Date Reviewed By Date **Printed Name** Printed Name Addendum approved on: Approval attested to by: Signature Date Printed Name

Chapter 3: Evaluation of Environmental Impact	ts Religious Facilities with Affordable Housing Ordinance
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CHAPTER 4 MITIGATION MEASURES

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 volatile organic compound (VOC) paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the SCAQMD's website at http://www.aqmd.gov/prdas/brochures/Super-Compliant_AIM.pdf.

- 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:
 - 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.
- 2-4 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.

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, 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 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 post2035 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 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

LEAD AGENCY

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Chapter 5: List of Preparers	Religious Facilities with Affordable Housing Ordinance
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