

**CITY OF PASADENA**  
**CLASS 32 CATEGORICAL EXEMPTION EVALUATION REPORT**

**280 Ramona Senior Housing Project**

**280 Ramona Street, Pasadena, California 91101**

**September 2022**

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This Categorical Exemption Evaluation Report documents the eligibility of the City of Pasadena's and National CORE's proposed 280 Ramona Senior Housing Project (Project) for a Categorical Exemption from the California Environmental Quality Act (CEQA).

**Project Description and Location**

The Project Site is bound by Ramona Street to the north, the five-story Centennial Place (former Young Mens Christian Association [YMCA]) building to the west, East Holly Street to the south, and Garfield Avenue to the east, with Pasadena City Hall to the east across Garfield Avenue. The Project Site is irregularly shaped and is made up of a single parcel (Assessor's Parcel Number 5723-018-910), totaling approximately 0.99 acres in size. The Project Site is located in the Pasadena Civic Center Historic District, fronting on Centennial Plaza (intersection of Holly Street and Garfield Avenue), with nearby buildings including Pasadena City Hall and other government buildings, parking lots, and commercial buildings. A Regional Location Map and a Project Location Map are provided respectively as **Figure 1** and **Figure 2**. The Project Site and the surrounding land uses are shown in **Figure 3**.

*Proposed Project*

The Proposed Project would consist of the construction of a new five-story, 106-unit senior affordable housing building on the southwest corner of Ramona Street and Garfield Avenue in the City of Pasadena's Civic Center Historic District. Each of the 106 residential units would be affordable, exclusive of a single two-bedroom manager's unit, which would be market rate. The Project would provide 46 studio units, 59 one-bedroom units, and 1 two-bedroom manager's unit. The Project would also include amenities, such as an approximately 3,500-square-foot publicly accessible courtyard on the ground floor, two outdoor patios on the second and third floors overlooking the central courtyard, an approximately 1,500-square-foot community room, offices, and a community space on the second floor.

In order to accommodate the proposed structure, the following existing Project Site improvements/features would be removed/demolished: the existing concrete storage building; concrete pad and driveway leading from this storage building to Ramona Street; the walkways within the landscaped area on the eastern side of the Project Site; the concrete pad on the northwest side of the Project Site abutting the YMCA building; the chain-link fencing securing the central portion of the Project Site; and 26 of the 47 trees located on the Project Site (impacts to trees on the Project Site are discussed below). These existing Project Site improvements/features are discussed further in the Existing Conditions section, below.

The proposed structure would have a building footprint of 18,104 square feet and would rise to five stories above grade (59 feet, 6 inches). In total, the proposed building's gross floor area would be 77,150 square feet.

The Project would include a courtyard on the ground floor of the development, which would be accessible to the public through the structure's main entrance on the southeast corner of the Project Site. This main entrance is angled to face the Centennial Plaza circle formed by the intersection of Holly Street and Garfield Avenue to the southeast. The courtyard would include planters, furniture, and a trellis designed to create a courtyard for use by the public and the building's senior residents. The building would be set back approximately 45.5 feet from Garfield Avenue (with approximately 35.5 feet between a decorative planter in front of the proposed building and Garfield Avenue) and approximately 36 feet from Holly Street. The proposed building would be set back approximately 10 feet from the Centennial Place/YMCA building to the west. This separation between the two buildings would include a hardscape path and landscaped area.

The ground level would include the main entrance on the southeast side of the proposed structure, a community room, the two-bedroom manager's unit, a lobby, the leasing office, a trash and recycling room, the central courtyard, and 12 residential units on the north and east sides of the building. The second floor would include an upper courtyard and community room, and 21 residential units. The third floor would include 26 residential units, level four would have 24 residential units, and level five would have 22 residential units. The roof would include approximately 8,000 square feet of solar area. The Project would not provide parking on-site.

Additionally, the Project would include several energy-saving design measures, such as an all-electric design (i.e., no natural gas hookups), an electric heat pump boiler system which is more efficient than a natural gas boiler, high efficiency heating, ventilation, and air conditioning (HVAC) systems, and LED lighting throughout the Project, with smart controls throughout to conserve energy.

As shown in **Figures 4** and **5**, the architectural design of the Project would be inspired by the principles of the Beaux Arts style in order to complement the surrounding built environment. Specifically, the proposed structure would be constructed with a basic wood frame over a concrete podium. The exterior walls would be smooth cement plaster with integral colors, precast concrete accents, and precast sills and frieze patterns around the main entrance and windows and rooflines. The main entrance, overlooking Centennial Plaza southeast of the Project Site, is flanked by two towers that rise to 66 feet 11 inches (capped with fish scale metal roof shingles) and is characterized by a metal arch design feature, creating an approximately 20-foot-wide opening that allows for visibility into central courtyard. The structure would also include a cornice with red, clay barrel tiles except for at the southeast corner entrance, which is designed to complement design features of City Hall to the east. As stated above, the proposed structure is set back from Holly Street and Garfield Avenue in order to maintain existing view corridors and green space within the Centennial Plaza area and to match the orientation of surrounding structures (such as the Centennial Place/YMCA building to the west and Pasadena City Hall to the east).

With the setbacks discussed above, the Project would include green space to the east of the proposed structure, which would include the existing meteorological station and a number of street trees that are protected by the City of Pasadena, as well as the wide sidewalks and street trees on the south side of the Project Site along Holly Street. The weather station and street trees located along Garfield Avenue would be preserved in place. As shown in **Figure 3**, the Project Site

extends along Holly Street, on the south side of the existing YMCA building to the west. The Project would include landscaping improvements in this area; however, the Project would not encroach into the ornate, wide sidewalks located along Holly Street and Garfield Avenue (described in Existing Conditions, below). Further, the street trees along Holly Street and Garfield Avenue, as well as the existing concrete sidewalks extending from Holly Street to the YMCA building, would be preserved in place. The Proposed Project would include decorative bushes along the building's northern elevation along Ramona Street, managed landscaped areas on the east and south sides of the Project Site, accessory plantings on either side of the building's main entrance, trees and decorative ground cover within portions of the 10-foot gap between the proposed structure and the Centennial Place/YMCA building to the west, and decorative landscape elements (such as planters and an overhead trellis) in the central courtyard..

The Project Site includes 36 trees within the Project Site boundary and there are 11 street trees just outside the Project Site boundary, located within the City's right-of-way in Holly Street and Garfield Avenue, for a total of 47 trees. The Project Site is owned by the City of Pasadena and would be managed by the Project applicant through a long-term lease. As such, because the City currently has and would maintain ownership of the Project Site, all 47 trees on and surrounding the Project Site are public trees and are subject to the provisions of Pasadena's Tree Protection Ordinance (Chapter 8.52 of the City's Municipal Code). An inventory of trees on the Project Site is provided as **Figure 6**. As shown on **Figure 6**, the Project would require removal of 26 City trees, which are located in the center of the Project Site and would be within the proposed structure's building footprint. The 26 trees proposed for removal include a variety of species, including coast live oak (3), holly oak (1), Engelmann oak (1), southern magnolia (2), Victorian box (3), mock orange (3), coastal redwood (2), arborvitae (3), windmill palm (2), and strawberry (6). All 11 street trees would be preserved in place with protective fencing installed during Project-related construction activities; they include nine Engelmann oak trees located along the Holly Street frontage and two southern magnolia trees located along the Garfield Avenue frontage.

The Project Site is relatively flat and would not require extensive grading as there would be no subterranean level associated with the Project. Project construction-related grading would be limited to preparation of the site for constructing the building foundation and for limited trenching to connect the proposed structure to existing utilities within surrounding City rights-of-way. Construction is estimated to take 22 months, beginning in spring 2023. Project construction is anticipated to be complete in February 2025. According to the Project's construction vibration management plan, larger construction equipment would be restricted to the central and eastern parts of the Project Site, as shown in **Figure 7**.

#### *Existing Conditions*

As stated above, the Project Site is bound by the five-story (approximately 60 feet high) YMCA building to the west (now used as the Centennial Place supportive housing project), Ramona Street to the north, Garfield Avenue to the east, and Holly Street to the south. As stated above and as shown in **Figure 3**, a portion of the Project Site extends along the south side of the YMCA building. Across Ramona Street to the north is the City of Pasadena Permit Center (the Hale Building), at the northwestern corner of Garfield Avenue and Ramona Street, as well as a five-level (approximately 45 feet high) public parking structure at the northeastern corner of Ramona Street and Marengo Avenue. Across Garfield Avenue to the northeast is the Pasadena Courthouse. Pasadena City Hall is located across Garfield Avenue to the east. Across Holly Street to the south is the historic YWCA building, which is currently vacant.

The Project Site has been disturbed by past uses and is currently characterized by gravel and bare earth on the western and central portion of the Project Site; an existing concrete structure with trash enclosure on the north-central portion of the Project Site; a mixture of mature trees varying in size, species, and health concentrated on the southern and eastern portions of the Project Site; and managed landscaping and public space on the eastern portion of the Project Site. The western/central portion of the Project Site that abuts the YMCA building to the west, formerly used for parking and characterized by bare earth and gravel, is secured by a chain-link fence with a gated driveway onto Ramona Street to the north. Immediately east of this fenced area, the Project Site includes a small, single-story concrete storage building approximately 550 square feet in size. This storage building includes a concrete pad and driveway on the north side of the structure leading to a gated entrance onto Ramona Street. On the east side of this concrete driveway and storage building is a 6-foot-tall concrete block wall, which is covered with decorative climbing ivy. Along the Project Site's northern boundary, Ramona Street is improved with metered, parallel street parking, a concrete sidewalk, and streetlamps.

The eastern portion of the Project Site includes a landscaped area characterized by mature trees, concrete walking paths, a park bench, trash can, and turf grass. This area also includes a Pasadena Department of Water and Power (PWP) meteorological station, which is located on a concrete pad surrounded on all sides by a chain-link fence and managed landscaping used to screen the station from view. Along the Project Site's eastern frontage, Garfield Avenue includes metered, perpendicular street parking spaces and a 24-foot-wide sidewalk with a decorative, inlaid brick pattern. This sidewalk with intricate brick pattern extends on the east and west sides of Garfield Avenue through the Civic Center area, from East Walnut Street to the north to East Colorado Boulevard to the south. This sidewalk also extends west from Centennial Plaza, along the north and south sides of Holly Street to North Marengo Avenue. The south side of the Project Site is characterized by mature trees and areas of bare earth and mulch ground cover. The portion of the Project Site that extends from the YMCA building to the walking path on the eastern side of the building is secured with a chain-link fence. Along the southern boundary of the Project Site, Holly Street is characterized by the decorative sidewalk discussed above, streetlamps, park benches, trash cans, and metered street parking spaces oriented at a 45-degree angle from Holly Street.

The Project Site includes 47 trees, all of which are on City-owned land and are subject to the City's Tree Protection Ordinance. Of the 47 trees located on and around the Project Site, 11 are street trees located along its southern boundary with Holly Street (9 Engelmann oak trees) and along its eastern boundary with Garfield Avenue (2 southern magnolia trees). The 36 trees located throughout the rest of the Project Site include a mix of magnolia trees, oak trees, palm trees, arborvitae, and mock orange trees. The locations for these trees, as well as identification of which trees are proposed for removal, are displayed in **Figure 6**.

The Project Site is zoned as CD-2 (Civic Center/Midtown) by the Pasadena Zoning Code (Section 17.30), which indicates that the Project Site is located within the Central District Specific Plan (CDSP) area. The Project Site is located within the Civic Center "core area" of the CDSP area. This location affords multiple alternative transportation options, such as sidewalks connecting the Project Site to the urban street network in downtown Pasadena, light rail service located approximately 800 feet west of the Project Site immediately east of Memorial Park, and a Pasadena Transit bus stop (Route 40) on the east side of North Marengo Avenue in front of the historic YMCA building that is adjacent to the Project Site.

### **Categorical Exemption**



CEQA and the State CEQA Guidelines require the preparation of environmental documents to assess and report the environmental impacts of certain types of projects that could result in adverse effects on the environment. Pursuant to CEQA Section 21084, the CEQA Guidelines (Section 15300 et seq.) also define classes of projects that are found by the Secretary of the California Natural Resources Agency to not have a significant effect on the environment and thus are declared to be categorically exempt from the requirement for the preparation of environmental documents. These types of projects are exempt from CEQA, provided that none of the exceptions to the use of categorical exemptions apply (CEQA Guidelines Section 15300.2).

Among the list of categorically exempt classes of projects is Class 32 In-Fill Development Projects, as defined in CEQA Guidelines Section 15332. Class 32 projects consist of those characterized as infill development meeting the following conditions identified in Section 15332:

- (a) the project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations;
- (b) the proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses;
- (c) the project site has no habitat for endangered, rare, or threatened species;
- (d) approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and
- (e) the site can be adequately served by all required utilities and public services.

The paragraphs below evaluate the Project's satisfaction of these criteria.

#### Consistency with General Plan Designation and Policies and Zoning Designation and Regulations

The Project Site is designated as medium mixed use in the City of Pasadena General Plan Land Use Element. The General Plan identifies 2.25 FAR and 87 dwelling units per acre as the maximum density for land designated medium mixed use. The General Plan states that development within medium mixed use areas should be characterized by shared open spaces, extensive landscaping, and small to medium separations between buildings. Further, the General Plan states that development projects containing housing shall incorporate on-site amenities, such as courtyards, recreation facilities, and/or similar elements and development projects that face the street shall be designed to enhance pedestrian activity with distinctive entries. Because the Project would include a distinctive pedestrian entrance, community amenities (i.e., community rooms and outdoor gathering areas), and would result in less than the maximum residential density for the medium mixed use land use designation (discussed in the Land Use and Zoning section, below), the Project would be consistent with the General Plan. Further, because the Project would provide affordable housing for seniors, the Project would be consistent with General Plan goals and policies, such as Goal HE-4 of the City's General Plan House Element, "adequate housing opportunities and support services for seniors, people with disabilities, families with children, college students, and people in need of emergency, transitional, or supportive housing" and Policy HE-4.1 "support development and maintenance of affordable senior rental and ownership

housing and supportive services to facilitate maximum independence and the ability of seniors to remain in their homes and/or in the community.”<sup>1</sup>

The Project Site is located within the CDSP area, which encompasses approximately 960 acres and includes the Old Pasadena, Civic Center, Playhouse District, and South Lake Avenue areas of the City. In general, the Central District is bound by the 210 and 710 freeways to the north and west; two blocks east of Lake Avenue (approaching the campuses of the California Institute of Technology and Pasadena City College) to the east; and California Boulevard to the south (except for a portion of the specific plan area that extends south of California Boulevard along the Arroyo Parkway corridor). The Project Site is located within the Civic Center/Midtown subdistrict of the CDSP area and, more specifically, within a precinct of the subdistrict identified as the Civic Center Core. This precinct in particular functions as the City's symbolic and public center, and features a distinguished grouping of civic buildings that includes City Hall and the Central Library. The CDSP states that “the design of all buildings and public spaces in this precinct should reflect the highest quality, respect the prominence of civic landmark buildings, and reinforce the vision of the Bennett Plan.” The Bennett Plan, finalized in 1925, lays the foundation for the Civic Center district by including architectural concepts, such as promoting the Beaux Arts style, and strategies for expanding/landscaping the east/west thoroughfares in the district to provide landscaped areas that would be reminiscent of the City Beautiful movement of the early 1900s, which promoted the placement of public structures within and around landscaped park amenities.

The CDSP identifies Holly Street and Garfield Avenue as Civic Promenades, connected by a civic plaza (Centennial Plaza). The CDSP further states that “land uses in the Civic Center/Midtown subdistrict should promote civic life, with a predominance of civic, cultural and public service institutions and activities” that also “provide for the integration of a complementary mix of commercial and residential uses.” Additionally, the City Beautiful vision for the area, as promoted through the Bennett Plan, should be promoted “through 1) preservation of historically significant buildings; 2) requirements for new buildings that are complementary to existing landmarks; and 3) reintegration of the Beaux-Arts axial plan.”

As described above in the Project Description, the Project would complement surrounding land uses, as is required in the CDSP, through incorporation of Project design features, such as the grand entrance, orientation of the Project's entrance onto Centennial Plaza, and maintaining building setbacks from Holly Street and Garfield Avenue. Further, the Project would be similar in mass and scale to surrounding uses, such as the Centennial Place/YMCA building to the west, and would include architectural details, such as massing articulation to provide visual interest, ensure consistency with the overall Civic Center, and contrast the predominantly monolithic YMCA building. With such design features, building placement, and use of materials, the Project would be consistent with the vision for the precinct identified in the CDSP.

### *Land Use and Zoning*

The Project Site is classified as CD-2 (Civic Center/Midtown) by the Pasadena Zoning Code (Section 17.30), which indicates that the Project Site is located within the CDSP area, as described above. Per the City's Zoning Code, the purpose of the Civic Center/Midtown subdistrict of the Central District is to strengthen its role as the symbolic and governmental center of the City, supporting civic, cultural, and public service institutions, while augmenting the character of the

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<sup>1</sup> City of Pasadena, General Plan Housing Element 2014-2021, adopted February 3, 2014. Note, the draft 2021-2029 Housing Element update includes the same Goal HE-4 and policy HE-4.1.

area with a complementary mixture of uses. The Project Site is located within the Civic Center Core precinct of the Civic Center/Midtown subdistrict, which has an emphasis on public institution and mixed-use development.<sup>2</sup> Per Figure 3-4, Central District Housing/Ground Floor Map, of the City's zoning regulations for the Central District (Section 17.30.030), housing is permitted on the Project Site. Specifically, multifamily housing, supportive housing, and single-room occupancy uses are permitted within the CD-2 zone. The Project Site has a maximum residential density of 87 dwelling units per acre, a maximum height of 60 feet, and a maximum floor area ratio (FAR) of 2.25, per Section 17.30.040, CD General Development Standards.

Additionally, Pasadena's Zoning Code provides density bonuses, waivers, and incentives, per Chapter 17.43, which establishes procedures to implement the State Density Bonus Law in Government Code Section 65915. To qualify for the 35 percent residential density bonus, a project must include 11 percent very low-income units or 20 percent low-income units. As an affordable housing project, the Proposed Project includes 100 percent affordable units for seniors (with the exception of one resident manager unit). With the density bonus, the number of allowable units would increase from 87 units per acre to 117 units per acre. As the Proposed Project proposes to construct 106 units on a 0.99-acre Project Site, the Project would be consistent with the allowable density in the Zoning Code. Further, with a proposed gross floor area of 77,150 square feet, the Project would have a FAR of 1.78, which would be below the 2.25 FAR maximum.<sup>3</sup> Finally, with a proposed height of 59 feet, 9.5 inches, the Proposed Project would be below the maximum building height of 60 feet for the Central District zone.

### *Scale and Urban Design*

The Project is currently undergoing design review, per Pasadena Municipal Code Section 17.61.030. Specifically, because the Project would include a structure of 25,000 square feet or more, design review must be conducted by the City's Design Commission at a public hearing (Section 17.61.030, Table 6-3). The purpose of the Design Review process is to apply Citywide urban design principles to ensure that new construction supports the best of the City's architectural traditions; encourage new structures that show creativity and imagination, add distinction, interest, and variety to the community, and are environmentally sustainable; promote architectural and design excellence in new construction and discourage poor-quality development; ensure that future development should reflect the values of the community, enhance the surrounding environment, visually harmonize with its surroundings and not unnecessarily block scenic views, and avoid nostalgic misrepresentations that may confuse the relationships among structures over time; ensure that new landscaping provides a visually pleasing setting for structures on the site; and promote the protection and retention of landmark, native, and specimen trees and if feasible mature canopy trees and other significant landscaping of aesthetic and environmental value.

The Project's design is meant to complement the planning and architectural character of the surrounding land uses with a Beaux Arts style and exterior design treatments, such as smooth cement plaster exteriors with integral colors and precast concrete, as well as precast sills and frieze patterns. Additionally, the Project would include a 36-foot setback from Holly Street and a 45-foot setback from Centennial Plaza in order to maintain the existing open nature of Holly Street as a

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<sup>2</sup> City of Pasadena Central District Specific Plan, Section 4, Maps 10 and 11

<sup>3</sup> FAR is calculated as the gross floor area (inside face of exterior walls) / total area of a project site. For the Project, FAR is calculated as 77,150 square feet / 0.99 acres (43,258 square feet) = 1.783, rounded down to 1.78.

viewing corridor toward City Hall. Similar to City Hall, the Project's courtyard would be publicly accessible through a grand entrance, which would be located at the southeast corner of the proposed structure.

Further, the street trees along Holly Street and Garfield Avenue, as well as the existing, decorated concrete sidewalks extending from Holly Street to the Centennial Place/YMCA building, would be preserved in place. The Proposed Project would include decorative bushes along the building's northern elevation along Ramona Street, managed landscaped areas on the east and south sides of the Project Site, accessory plantings on either side of the building's main entrance, trees and decorative ground cover within portions of the 10-foot gap between the proposed structure and the Centennial Place/YMCA building to the west, and decorative landscape elements in the central courtyard.

### Consistency with the City of Pasadena Climate Action Plan

The Pasadena Climate Action Plan (CAP), adopted on March 5, 2018, is a strategic framework for measuring, planning, and reducing the City's share of greenhouse gas (GHG) emissions and includes an ambitious goal of reducing emissions by more than half by the year 2035. The purpose of the Pasadena CAP is to analyze GHG emissions at a programmatic level, outline a strategy to reduce and mitigate municipal and community-wide GHG emissions, demonstrate Pasadena's commitment to achieving the statewide emissions reduction targets, and serve as a qualified GHG reduction plan consistent with CEQA Guidelines Section 15183.5.

To determine whether new development projects are consistent with the Pasadena CAP, and to ensure that projects are contributing to GHG reductions, the Pasadena CAP Consistency Checklist (Checklist) is used for discretionary projects subject to and not exempt from CEQA. Projects seeking a Class 32 Categorical Exemption from CEQA are also required to demonstrate consistency with the CAP.

The Project's consistency with the Pasadena CAP is analyzed in accordance with Steps 1 through 3 of the Pasadena CAP Consistency Checklist. Step 1 requires the completion of a Master Land Use Application Form. Step 2 requires demonstrating consistency with the Land Use Element of the City of Pasadena General Plan, adopted August 18, 2015. Step 3 requires that the Project demonstrate consistency with one of three options: Option A (Sustainable Development Actions), Option B (GHG Efficiency), and/or Option C (Net Zero GHG Emissions). For the purpose of this Project, consistency with Option A is utilized. Option A requires implementation of sustainable development actions, as deemed appropriate by the Pasadena CAP, which would become conditions of the entitlement for approval of a project.

#### *Step 1: Complete a Master Land Use Application Form*

In compliance with Step 1, the Project Applicant, National CORE, is required to submit a Master Land Use Application Form to the City following City Council approval of the development agreement and loan agreement. As such, compliance with this requirement would ensure that the Proposed Project is compliant with Checklist Step 1.

#### *Step 2: Demonstrate Consistency with the Land Use Element of the General Plan*

As discussed above in the Consistency with General Plan section, the Proposed Project would be consistent with the CDSP, the Project Site's zoning and General Plan designations, and all relevant General Plan policies and zoning regulations. Therefore, the proposed Project is compliant with Checklist Step 2.

Step 3: Demonstrate Consistency with Pasadena's CAP

As discussed above, Option A (Sustainable Development Actions) has been chosen to demonstrate consistency with the Pasadena CAP. The CAP's Sustainable Development Actions are grouped into two categories: Mandatory Actions and Selective Actions. The Project's compliance with Option A's Mandatory and Selective Actions are discussed below

Mandatory Actions

To comply with Checklist Option A, the City requires a project to implement all of the Mandatory Actions shown in **Table 1**.

**Table 1**  
**Pasadena CAP Mandatory Actions**

GHG Reduction Strategy	Sustainable Development Actions
<b>T-1.2:</b> Continue to improve bicycle and pedestrian safety	<b>Bicycle Storage:</b> Does the project provide bicycle storage lockers, racks, or other bicycle storage facilities for residents/employees?
<b>T-3.1:</b> Decrease annual commuter miles traveled by single occupancy vehicles	<b>Transportation Demand Management (TDM):</b> Does the project include a TDM plan? A TDM plan is required for the following projects: multifamily residential development that are 100 or more units; mixed-use developments with 50 or more residential units or 50,000 square feet or more of non-residential development; or non-residential projects which exceed 75,000 square feet.
<b>T-4.1:</b> Expand the availability and use of alternative fuel vehicles and fueling infrastructure	<b>Alternative Vehicle Fueling Wiring:</b> For projects with more than three parking spaces, does the project provide wiring for at least one 240V Type II electric car charger?
<b>E-1.2:</b> Encourage the use of energy conservation devices and passive design concepts that make use of the natural climate to increase energy efficiency	<b>Passive Design Features:</b> Does the project utilize passive design techniques such as awnings or overhangs on the east, west, and south facing windows which block the high summer sun but allow in lower winter sun?
<b>WC-1.1:</b> Reduce potable water usage throughout Pasadena	<b>Irrigation Efficiency:</b> Will the project utilize drought tolerant landscaping and/or drip irrigation and/or weather controllers to reduce outdoor water use?
<b>WR-1.1:</b> Continue to reduce solid waste and landfill GHG emissions	<b>Facilitate Recycling:</b> Does the project include a space for separate trash and recycling bins as well as provide informational signage/handouts for residents/employees outlining materials to be recycled?

Source: City of Pasadena, *Pasadena Climate Action Plan Appendix D, Climate Action Plan Consistency Checklist*, adopted March 5, 2018.

The Proposed Project would include the following sustainable design features that would satisfy the Mandatory Actions shown in **Table 1**:

- **T-1.2:** Bicycle Storage – In accordance with the City's development standards, the Proposed Project would include bicycle parking for residents (Pasadena Municipal Code 17.46.320). Specifically, the Proposed Project would provide bicycle parking/storage space on the first floor of the proposed structure.
- **T-3.1:** Transportation Demand Management (TDM) Plan – In accordance with Pasadena Municipal Code Section 17.46.290, Trip Reduction Requirements, multifamily residential projects with 100 units or more, the Project must submit a TDM Program Plan as required by Chapter 10.64 of the Municipal Code. As a multifamily residential building with 111 units, the Proposed Project would be required by Municipal Code to include a TDM plan and would, therefore, satisfy this action.
- **T-4.1:** Alternative Vehicle Fueling Wiring – In accordance with Section 4.106.4.2 of the 2019 California Green Building Code (CalGreen), for new multifamily dwelling projects,

“If residential parking is available, ten (10) percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future [electric vehicle supply equipment].” The Proposed Project would not provide on-site parking. As such, because the Project would provide fewer than three parking spaces, it does not need to implement the Sustainable Development Action related to alternative vehicle fueling wiring.

- **E-1.2:** Passive Design Features – The Proposed Project includes passive design features such as overhangs/awnings that provide shade on select entrances, where the design would also be compatible with the architectural character of the Civic Center area; dual-pane low-energy coated glazing at windows and doors to minimize infrared heat gain in the summer and heat loss in the winter; open-air and ventilated corridors; and dwelling unit windows that are operable for passive ventilation during mild weather months.
- **WC-1.1:** Irrigation Efficiency – In accordance with the City’s development code, the Proposed Project would include drought-tolerant landscaping to reduce outdoor water use (Pasadena Municipal Code 17.44.050).
- **WR-1.1:** Facilitate Recycling – In accordance with Pasadena Municipal Code Section 17.40.120, Refuse Storage Facilities, the Proposed Project is required to include a space for separate trash and recycling bins. Specifically, the Project proposes to provide a trash and recycling room, which would accommodate five containers (two containers for trash and three for recycling). Therefore, by complying with the Municipal Code, the Proposed Project would satisfy this action.

*Selective Actions*

In addition to the Mandatory Actions outlined in **Table 1**, the Project would be required to implement Selective Actions consistent with Checklist Option A. Selective Actions are classified into five categories: Energy Efficiency and Conservation, Sustainable Mobility and Land Use, Water Conservation, Waste Reduction, and Urban Greening. Examples of Selective Actions include renewable energy, bike and car sharing, rainwater capture and reuse, on-site composting, and public greenspace.

In accordance with Checklist Option A, the Project would be required to include, at a minimum, the following Selective Actions:

- One additional action in the Energy Efficiency and Conservation category;
- One additional action in the Sustainable Mobility and Land Use category; and
- Three additional actions from any category.

The potential Selective Actions from Checklist Option A are shown in **Table 2: Pasadena CAP Selective Actions**.

**Table 2  
Pasadena CAP Selective Actions**

GHG Reduction Strategy	Sustainable Development Actions
<b>ENERGY EFFICIENCY AND CONSERVATION</b>	
	<b>Zero-Net Energy (ZNE):</b> Does the project generate 100% of electricity required on site?

GHG Reduction Strategy	Sustainable Development Actions
<b>E-1.1:</b> Increase energy efficiency requirements of new buildings to perform better than the 2016 Title 24 Standards	<b>Energy Efficiency (Exceed 2016 Title 24):</b> Does the project exceed the 2016 Title 24 Efficiency Standards by at least 5%?
<b>E-4.1:</b> Increase city-wide use of carbon neutral energy by encouraging and/or supporting carbon-neutral technologies	<b>Renewable Energy:</b> Does the project generate at least 60% of the building's projected electricity needs through renewable energy?
<b>SUSTAINABLE MOBILITY AND LAND USE</b>	
<b>T-1.1:</b> Continue to expand Pasadena's bicycle and pedestrian network	<b>End-of-Trip Bicycle Facilities (Commercial Development):</b> Does the project provide at least one shower for every 50 employees?
	<b>Bike Share:</b> Does the project include a bike share station?
<b>T-3.1:</b> Decrease annual commuter miles traveled by single occupancy vehicles.	<b>Car Sharing:</b> Does the project provide/facilitate car sharing by providing a designated car share space on or within the immediate vicinity of the project site? Examples of car share options include ZipCar, PitCarz, and Getaround.
	<b>Parking De-Coupling:</b> Does the project separate the cost of parking from the cost of commercial space and/or residential housing by charging for each individually?
	<b>Transportation Demand Management (TDM):</b> Does the project include a TDM plan? (Note: this measure cannot be combined with the mandatory measure that requires a TDM plan for projects that meet certain size thresholds.)
<b>T-4.1:</b> Expand the availability and use of alternative fuel vehicles and fueling infrastructure.	<b>Alternative Vehicle Fueling Infrastructure:</b> Does the proposed project include functioning 240V Type II electric car chargers at 3% of parking spaces (at least one charger) AND conduit to allow for future charger installation to 25% of spaces?
<b>T-5.1:</b> Facilitate high density, mixed-use, transit-oriented, and infill development.	<b>Transit Oriented Development:</b> Is the project located within 0.25 mile of a major transit stop as defined in the Zoning Code.
<b>T-6.1:</b> Reduce GHG emissions from heavy duty construction equipment and vehicles.	<b>Reduce GHG emissions from heavy-construction equipment:</b> Will the project utilize at least 30% alternative fueled construction equipment (by pieces of equipment) and implement an equipment idling limit of 3 minutes?
<b>WATER CONSERVATION</b>	
<b>WC-1.1:</b> Reduce potable water use throughout Pasadena.	<b>Indoor Water Efficiency:</b> Will the project achieve at least a 35% reduction in indoor water use per the LEED V4 Indoor Water Use Reduction Calculator?
<b>WC-2.1:</b> Increase access to and use of non-potable water.	<b>Rainwater Capture and Reuse:</b> Does the project utilize a rainwater capture and reuse system to reduce the amount of potable water consumed on site?
	<b>Indoor &amp; Outdoor Recycled Water:</b> Will the project be plumbed to utilize recycled water for either indoor or outdoor water use?
	<b>Greywater:</b> Will the project be plumbed to take advantage of greywater produced on site such as a laundry to landscape system or another on-site water reuse system?
<b>WC-3.1:</b> Improve storm water to slow, sink, and treat water run-off, recharge groundwater, and improve water quality.	<b>Permeable Surfaces:</b> Is at least 30% of the hardscape (e.g., surface parking lots, walkways, patios, etc.) permeable to allow infiltration?
	<b>Stormwater Capture:</b> Is the project designed to retain stormwater resulting from the 95th percentile, 24 hour rain event as defined by the Los Angeles County 95th percentile precipitation isohyetal map?
<b>WASTE REDUCTION</b>	
<b>WR-1.1:</b> Continue to reduce solid waste and landfill GHG emissions.	<b>Recycled Materials:</b> Does the project utilize building materials and furnishings with at least 50% (pre- or post-consumer) recycled content or products which are designed for reuse? At a minimum, projects must show at least 10% of the material by cost meets the recycled content requirement?
<b>WR-3.1:</b> Implement a city-wide composting program to limit the amount of organic material entering landfills.	<b>On-Site Composting:</b> Does the project include an area specifically designated for on-site composting?

GHG Reduction Strategy	Sustainable Development Actions
<b>URBAN GREENING</b>	
<b>UG-1.1:</b> Continue to preserve, enhance, and acquire additional green space throughout Pasadena to improve carbon sequestration, reduce the urban heat-island effect, and increase opportunities for active recreation.	<b>Greenspace:</b> Does the project include at least 500 sq. ft. of public use greenspace (landscaped yards, parklets, rooftop garden, etc.)? At a minimum, 50% of the required greenspace must include softscape landscaping (e.g., trees, plants, grass, etc.).
<b>UG-2.1:</b> Continue to protect existing trees and plant new ones to improve and ensure viability of Pasadena's urban forest	<b>Trees:</b> Does the project result in a net gain of trees?

Source: City of Pasadena, *Pasadena Climate Action Plan Appendix D, Climate Action Plan Consistency Checklist*, adopted March 5, 2018.

The Proposed Project would incorporate the following five sustainable design features, which would satisfy the Selective Actions criteria discussed above for Checklist Option A:

#### *Energy Efficiency and Conservation*

- **E-1.1:** Energy Efficiency Requirements – The Project would meet the Title 24 energy requirements based on the California Building Code 2019 Energy Code, which exceeds the 2016 Title 24 Efficiency Standards by at least 5 percent.

#### *Sustainable Mobility and Land Use*

- **T-3.1:** Parking De-Coupling – As the Project would not provide parking on-site, the Project is separating the cost of housing from the cost of parking.
- **T-5.1:** Transit Oriented Development – Section 21064.3 of the CEQA defines a major transit stop as "a site containing ... an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Public transit service within the Project study area is currently provided by Los Angeles Metro and Pasadena Transit (PT). Specifically, the Project Site is located approximately 800 feet (less than one-quarter mile) east of the Los Angeles Metro L (Gold) Line Memorial Park light rail station, which is located at the intersection of Holly Street and North Arroyo Parkway (see **Figure 3**). Additionally, a PT bus stop (Route 40) is located on the east side of North Marengo Avenue in front of the historic YMCA building that is adjacent to the Project Site.

Given the proximity of multiple transit stops and transit lines, including transit lines with 15 minute or less service intervals during the peak hours, the Proposed Project satisfies this action.

#### *Water Conservation*

- **WC-3.1:** The Project would include approximately 15,180 square feet of landscape pervious surfaces, including planting areas, turf, ground cover, and decomposed granite. Within the central courtyard area, drains will collect rainwater, which would be conveyed to a central drywell located within the open space at the northeast corner of the Project Site.

#### *Urban Greening*

- **UG-1.1:** The Project would provide at least 30 percent of the net floor area of the structure as dedicated open space. This would create a total of 16,900 square feet of open space areas for public use. These areas include approximately 13,400 square



feet of lawn areas, ground cover, and decomposed granite along Holly Street and Garfield Avenue, as well as an approximately 3,500-square-foot interior courtyard with raised planting areas.

As discussed above, the Proposed Project includes sustainable design features that would satisfy the requirements for Pasadena CAP Consistency Checklist Option A. As part of the City's normal design review and plan check process, the City will verify that final Project design plans comply with the Mandatory Actions and Selective Actions identified above. As such, the Project would be consistent with the Pasadena CAP.

#### Project Location within City Limits on a Site No More than 5 Acres Substantially Surrounded by Urban Uses

The Project Site is in an urbanized and developed area of the City of Pasadena. The approximately 0.99-acre site is surrounded by Ramona Street and the City of Pasadena Permit Center to the north, a five-story historical YMCA building to the west currently used as supportive housing, East Holly Street to the south, and Garfield Street and Pasadena City Hall to the east. The project is within the Central District of the City and surrounded by a multitude of urban uses including large-scale residential, commercial, institutional and mixed-use buildings and recreational uses. Therefore, the Project is consistent with this condition.

#### Habitat for Endangered, Rare, or Threatened Species

The Project Site does not contain any habitat that is biologically sensitive as it is already developed or has been disturbed by previous development. Further, the Project Site is located in a highly urbanized area and is completely surrounded by development. Vacant areas on the Project Site have been previously disturbed and are characterized by gravel, bare earth, ruderal ground cover, and unmaintained non-native landscaping.

According to the US Fish and Wildlife Service's Information for Planning and Consultation (IPAC) system, four threatened or endangered species have the potential to be found in the vicinity of the Project Site: the California condor, the least Bell's vireo, the Braunton's milkvetch, and the Nevin's barberry.<sup>4</sup> All four of these species are considered endangered. A fifth species, the monarch butterfly, is identified by IPAC as having potential to be found in the Project vicinity; however, this species is a candidate, meaning it is under consideration for official listing by the US Fish and Wildlife Service and is not yet listed or proposed for listing. There are no critical habitats designated for any of these species within the Project Site, nor does the Project Site contain habitat necessary to support these listed species. Further, the Project Site is not identified by the City of Pasadena as a biologically sensitive area, nor does it contain any wetland or riparian habitat as identified by the National Wetlands Inventory.<sup>5</sup>

Therefore, because the site has been disturbed by past construction activities, and because the Project Site is located within a fully urbanized environment that is surrounded by disturbed areas (such as sidewalks, residential buildings, commercial uses, overhead powerlines and streetlights, and major arterial streets), the Project Site has no value as habitat utilized by endangered, rare, or threatened species.

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<sup>4</sup> US Fish and Wildlife Service, *Information for Planning and Conservation (IPAC) Report*, generated October 11, 2021.

<sup>5</sup> City of Pasadena, General Plan Update Draft EIR, Figure 5.3-2, 2015; US Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, accessed December 27, 2021.

Effects Relating to Traffic, Noise, Air Quality, or Water Quality

Traffic

The analysis provided in this section is derived from Transportation Impact Analyses prepared for the Proposed Project. On behalf of the City of Pasadena's Department of Transportation, Iteris, Inc. prepared an analysis of a previous version of the project, which included 111 residential units and a subterranean parking level, providing 44 parking spaces on-site.<sup>6</sup> This analysis is available as **Appendix A** of this report. Also included in **Appendix A**, is an updated Transportation Analysis memorandum, prepared by the City of Pasadena, which analyzes the transportation impacts of the Proposed Project (106 residential units and no proposed on-site parking).<sup>7</sup>

As stated above, the Proposed Project is bound by Ramona Street to the north, Garfield Avenue to the east, the Centennial Place/YMCA building to the west, and Holly Street to the south. The Project area is served by a number of City connector streets, such Walnut Street to the north, Marengo Avenue to the west, and Union Street to the south. In general, the roadway network in the Project area is arranged in a grid pattern with streets oriented either east/west or north/south.

Project analyses are based on the City of Pasadena's Transportation Impact Analysis Guidelines. The City's travel demand forecasting (TDF) model uses TransCAD software to simulate traffic levels and travel patterns for the City of Pasadena. The program consists of input files that summarize the City's land uses, street network, travel characteristics, and other key factors. Using this data, the model performs a series of calculations to determine the number of trips generated, the beginning and ending location of each trip, and the route taken by the trip.

The City of Pasadena has five metrics with impact thresholds that determine significance pursuant to CEQA. These metrics include vehicle miles traveled (VMT) per capita, vehicle trips (VT) per capita, proximity and quality of the bicycle network, proximity and quality of the transit network, and pedestrian accessibility. The thresholds of significance for each metric are displayed in **Table 3**, below, and are further described in the included Transportation Impact Analysis prepared for the Proposed Project.

**Table 3**  
**City of Pasadena CEQA Thresholds of Significance**

<b>Metric</b>	<b>Description</b>	<b>Impact Threshold</b>
1. VMT (vehicle miles traveled) Per Capita	VMT in the City of Pasadena per service population (population + jobs).	CEQA Threshold: Net change in VMT per capita is 16.8% below Citywide average baseline  <b>2017 Baseline: 35.6</b> <b>16.8% Below Baseline Threshold: 29.6</b>
2. VT (vehicle trips) Per Capita	VT in the City of Pasadena per service population.	CEQA Threshold: Net change in VT per service population is 16.8% below Citywide average baseline

<sup>6</sup> Iteris, Inc., Transportation Impact Analysis – CEQA Evaluation, February 18, 2022, prepared on behalf of City of Pasadena.

<sup>7</sup> City of Pasadena Department of Transportation, Transportation Analysis – CEQA memo, September 2, 2022.

		<b>2017 Baseline: 4.2 16.8% Below Baseline Threshold: 3.5</b>
3. Proximity and Quality of Bicycle Network	Percent of service population within a quarter mile of bicycle facility types.	CEQA Threshold: Any decrease in baseline Citywide service population within a ¼ mile of Level 1 or 2 bike facilities.  <b>2017 Baseline: 32.3%</b>
4. Proximity and Quality of Transit Network	Percent of service population located within a quarter mile of transit facility types.	CEQA Threshold: Any decrease in baseline Citywide service population within a ¼ miles of Level 1 or 2 transit facilities.  <b>2017 Baseline: 66.8%</b>
5. Pedestrian Accessibility	The Pedestrian Accessibility Score uses the mix of destinations and a network-based walkshed to evaluate walkability.	CEQA Threshold: Any decrease in the Citywide Pedestrian Accessibility Score  <b>2017 Baseline: 3.9</b>

Source: Iteris, Inc., Transportation Impact Analysis – CEQA Evaluation 280 Ramona Street, February 18, 2022, on behalf of the City of Pasadena.

Based on the Project's vehicular and non-vehicular trip-generating characteristics, trip length, and its interaction with other surrounding/Citywide land uses, as well as the City's transportation network, the Project would not exceed any adopted CEQA thresholds of significance, as shown in **Table 4**, below.

**Table 4  
Transportation Performance Metrics Summary and Significance Determination**

<b>Transportation Performance Metrics</b>	<b>Significant Impact Threshold</b>	<b>Incremental Change (Existing + Project)</b>	<b>Significant Impact?</b>
VMT Per Capita	29.6 (16.8% baseline value)	3.6	No
VT Per Capita	3.5 (16.8% baseline value)	0.5	No
Proximity and Quality of Bicycle Network	32.3%	32.3%	No
Proximity and Quality of Transit Network	66.8%	66.8%	No
Pedestrian Accessibility	3.9	3.9	No

Source: City of Pasadena, Transportation Impact Analysis, Ramona Senior Housing Project, CEQA Evaluation, September 2, 2022.

Notes: VMT= Vehicle Miles Traveled, VT= Vehicle Trips

Therefore, the analysis conducted by the City of Pasadena's Department of Transportation determined that the Project would not exceed any of the CEQA thresholds outlined in the City's

guidelines. As such, impacts would be less than significant, and no mitigation measures are required.

## Noise

The analysis in the following paragraphs is a summary of the Noise Technical Memorandum prepared for the Proposed Project, available as **Appendix B** of this report.<sup>8</sup> This Noise Technical memorandum studied a previous version of the Project, which included 111 residential units and a subterranean parking level, providing 44 parking spaces on-site. Also included in **Appendix B**, is an Addendum to the Air Quality and Noise Analyses prepared for the Project, which evaluates the changes to the Project design since the March 2022 Noise Technical Memorandum was prepared (i.e., design changes to the proposed building entry design, reduction of the number of residential units to 106 units, and elimination of the proposed subterranean parking level). The addendum's findings are discussed at the end of this Noise section.

The Project would generate noise as part of Project construction and operation. Construction activities would occur over approximately 22 months and would include the following phases: demolition, grading, building construction, and architectural coating. The Project is anticipated to be operational in 2025.

Project construction would require a variety of equipment, including backhoe, crane, drill rig, excavator, forklift, loader, tractor, trencher, water truck, and general industrial equipment. Sensitive receptors (i.e., land uses that are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose) surrounding the Project Site include the Centennial Place homeless services/residences to the immediate west and a church approximately 95 feet west, both of which may be exposed to elevated noise levels during Project construction. However, the Project would adhere to the City's Noise Ordinance governing hours of construction, prescribed noise levels generated by construction and mechanical equipment, and the allowed level of ambient noise (Municipal Code Chapter 9.36). In accordance with these regulations, construction noise would be limited to normal working hours (7:00 a.m. to 7:00 p.m. Monday through Friday, 8:00 a.m. to 5:00 p.m. on Saturday, in or within 500 feet of a residential area; construction activities are not allowed on Sundays or holidays). Municipal Code Section 9.36.080, Construction Equipment, prohibits operation of any powered construction equipment if the operation of such equipment emits noise at a level in excess of 85 dBA when measured within a radius of 100 feet from such equipment. Due to geometric spreading, these noise levels would diminish with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. As shown in the Noise Technical Memorandum prepared for this Project, the loudest piece of equipment associated with Project construction would be considered general industrial equipment, which would operate at a maximum noise level of 79 dBA at 100 feet from the source. Therefore, construction noise levels would not exceed the City's Noise Ordinance threshold of 85 dBA at 100 feet and the impact associated with construction noise would be considered less than significant.

With respect to Project operation, the Project would generate vehicle traffic, which would incrementally add to the existing mobile traffic noise along adjacent roadways. The most prominent source of mobile traffic noise in the Project vicinity is along Marengo Avenue. In community noise assessments, a 3 dBA increase is considered "barely perceptible," and increases

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<sup>8</sup> Michael Baker International, Ramona Senior Housing Project – Noise Technical Memorandum, March 18, 2022.

over 5 dBA are generally considered “readily perceptible.”<sup>9</sup> A project would result in a significant noise impact if a permanent increase in ambient noise levels of 3 dBA occurs upon Project implementation and the resulting noise level exceeds the applicable exterior standard at a noise-sensitive use.

As discussed in the Noise Technical Memorandum prepared for the Project, the existing noise levels at a distance of 100 feet from the centerlines of roadway segments in the Project vicinity ranged from 48.6 dBA along Holly Street between Garfield Avenue and Marengo Avenue to 61.7 dBA along Marengo Avenue north of Walnut Street. Multiple segments along Los Robles Avenue and Walnut Street would exceed the City's applicable land use compatibility standard under the “Existing Plus Project” scenario. However, these segments either exceed the City's applicable land use compatibility standard under the “Existing Without Project” scenario or the Project would result in an imperceptible increase in traffic noise (i.e., less than 3 dBA). Therefore, noise conditions along roadway segments in the Project vicinity would not exceed the 3.0 dBA increase threshold and the applicable, normally acceptable land use compatibility standard simultaneously.

The Project would also generate stationary noise, such as noise generated by the operation of mechanical equipment and outdoor areas. The Noise Technical Memorandum prepared for this Project states that noise would be generated by mechanical equipment and the mechanical exhaust vent, which would be located on the northwest side of the roof. The nearest sensitive receptors to the rooftop exhaust vent are the Centennial Place residential units, approximately 80 feet to the west. Typically, exhaust vent fan noise is 55 dBA at 50 feet from the source. At a distance of 80 feet, the resultant noise level at the Centennial Place residences would be approximately 51 dBA. Therefore, the proposed exhaust vent fan would not generate noise levels in excess of 5 dBA over existing ambient noise levels (68.7 dBA  $L_{eq}$ ), in compliance with Section 9.36.090 (Machinery, Equipment, Fans, and Air Conditioning) of the City's Noise Ordinance.

The Noise Technical Memorandum calculated that crowd noise associated with outdoor gatherings would be reduced to approximately 36 dBA at the nearest sensitive receptor to the Project's outdoor gathering space, due to the distance between the Project Site and the nearest sensitive receptor. As such, operation of the Project would not generate noise levels that would exceed the City's noise standards at the closest sensitive receptors.

Lastly, Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of some heavy-duty construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source; however, these vibrations can have effects on nearby structures. Using Federal Transit Administration (FTA) data, the Noise Technical Memorandum prepared for the Project determined that vibration velocities from typical heavy construction equipment operations would range from 0.003 to 0.089 inch/second peak particle velocity (PPV) at 25 feet from the source of activity. The nearest structure is the historic YMCA building located immediately west of the Project Site. As such, the most conservative architectural damage vibration threshold, as determined by the FTA, of 0.12 inch/second PPV is utilized. Although construction could occur up to the Project Site's western boundary, the Project Applicant prepared a construction vibration management plan (see **Figure 7**), which indicates that vibration-generating construction equipment would operate at tiered distances from the adjacent historical building. The majority of construction activities would not involve equipment

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<sup>9</sup> California Department of Transportation (CalTrans), Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

that would generate excessive vibration impacts to the nearby sensitive receptors. Further, construction activities would occur throughout the Project Site and would not be concentrated at the point closest to the sensitive receptors.

Vibration-generating construction equipment (i.e., hoe rams, large bulldozers, caisson drilling, loaded trucks, rock breakers, jackhammers, and small bulldozers) would only operate up to the referenced distance to ensure groundborne vibration levels would remain below the damage criterion (0.12 inch/second PPV). Therefore, construction vibration impacts associated with the Project would be less than significant.

Finally, the nearest public use airport to the Project Site is the San Gabriel Valley Airport (previously known as El Monte Airport), which lies approximately 7.8 miles southeast of the Project Site. The Project Site is not located within the airport influence area of the San Gabriel Valley Airport and the Project would, therefore, have no impact related to airport land use compatibility. As such, for the above-described reasons, the March 2022 Noise Technical Memorandum determined that the Project would have a less than significant impact related to noise and vibration impacts.

As stated above, the Project proposes five fewer units than what was analyzed in the March 2022 Noise Technical Memorandum and eliminates a previously proposed subterranean parking level from the Project design. Subsequently, there would be less construction activities, fewer trips generated during operation, and no parking activities within the Project boundary, as compared with the previous Project design. As such, by adhering to the Noise Ordinance, short-term construction noise impacts of the Project, as proposed, would be less than the previously proposed design, analyzed above. The Project would still implement the VMP and vibration monitoring system during construction. As the Project no longer includes a subterranean parking level, construction-related vibration levels would be lower than the previously analyzed project design.<sup>10</sup>

During operation, the Project would not generate parking lot noise within the Project boundary as there would be no parking proposed on the Project Site. Additionally, there would be fewer vehicle trips generated when compared with the previous Project design, as the number of units is reduced. As such, long-term noise impacts would be less than the previously analyzed Project design.

In conclusion, the Addendum to the Air Quality and Noise Analyses determined that there would be no new or significantly increased impacts on noise and vibration impacts compared to the previously analyzed Project design, and Project-related noise and vibration impacts would remain less than significant.

#### *Air Quality*

The analysis in the following paragraphs summarizes the Air Quality Technical Memorandum prepared for the Proposed Project in March 2022, available as **Appendix C** of this report.<sup>11</sup> This Air Quality Technical memorandum studies a previous version of the Project, which included 111 residential units and a subterranean parking level, providing 44 parking spaces on-site. Also included in **Appendix C**, is an Addendum to the Air Quality and Noise Analyses prepared for the Project in September 2022, which evaluates the changes to the Project design since the March

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<sup>10</sup> Michael Baker International, Addendum to Air Quality and Noise Analyses, September 9, 2022.

<sup>11</sup> Michael Baker International, Ramona Senior Housing Project – Air Quality Technical Memorandum, March 18, 2022.

2022 Air Quality Technical Memorandum was prepared (i.e., design changes to the proposed building entry, reduction of the number of residential units from 111 units to 106 units, and elimination of the proposed subterranean parking level). The addendum's findings are discussed at the end of this Air Quality section.

The Project is located within the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) has jurisdiction in the Basin, which has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are exceeded. In order to reduce emissions, the SCAQMD adopted the 2016 Air Quality Management Plan (AQMP), which establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state and federal air quality standards. The 2016 AQMP pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) produced by the Southern California Association of Governments (SCAG), updated emission inventory methodologies for various source categories, and SCAG's growth forecasts. The SCAQMD considers projects that are consistent with the AQMP to have less than significant cumulative air quality impacts. While SCAG has since adopted the 2020-2045 RTP/SCS, the SCAQMD has not released an updated AQMP that utilizes information from the 2020-2045 RTP/SCS. As such, the consistency analysis in the Air Quality Technical Memorandum prepared for this Project is based on the 2016 AQMP and the 2016-2040 RTP/SCS.

The SCAQMD established two criteria for determining consistency with the AQMP. The first criterion considers whether a project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay attainment of air quality standards. The second criterion considers whether a project would be consistent with the population, housing, and employment growth projections utilized by the AQMP. For determining consistency with AQMP consistency criterion 1, **Table 5** and **Table 6**, below, show Project-related emissions for construction and operation, as well as the SCAQMD thresholds for determining a significant impact.

In the short term, Project-related emissions would be generated by construction equipment, fugitive dust, worker vehicle exhaust, and applications of asphalt and surface coatings. In accordance with the SCAQMD Guidelines, the Air Quality Technical Memorandum utilized CalEEMod to model construction emissions for ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, which are shown in **Table 5**, below.

**Table 5  
Project Construction Emissions**

Emissions Source	Pollutant (pounds/day) <sup>1</sup>					
	ROG <sup>2</sup>	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Year 1</b>						
Construction Related Emissions <sup>3</sup>	3.87	47.97	38.40	0.15	5.06	2.31
<b>Year 2</b>						
Construction Related Emissions <sup>3</sup>	25.69	15.27	19.85	0.04	2.15	1.03
SCAQMD Thresholds	75	100	550	150	150	55
<b>Is Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
ROG = reactive organic gases; NO <sub>x</sub> = nitrogen oxides; CO = carbon monoxide; SO <sub>x</sub> = sulfur oxides; PM <sub>10</sub> = particulate matter up to 10 microns; PM <sub>2.5</sub> = particulate matter up to 2.5 microns. Notes:						

<ol style="list-style-type: none"> <li>1. Emissions were calculated using CalEEMod, version 2020.4.0.</li> <li>2. In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are O<sub>3</sub> precursors. As required, all architectural coatings for the Proposed Project structures would comply with SCAQMD Regulation XI, Rule 1113 – Architectural Coating. Rule 1113 provides specifications on painting practices as well as regulating the ROG content of paint.</li> <li>3. Modeling assumptions include compliance with SCAQMD Rule 403 which requires the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour.</li> </ol>
Source: Refer to Appendix A, <i>Air Quality Emissions Data</i> , of the Air Quality Technical Memorandum (see <b>Appendix C</b> ) prepared for this Project for detailed model input/output data.

As indicated in **Table 5**, above, criteria pollutant emissions during construction of the Proposed Project would not exceed the SCAQMD significance thresholds. Thus, total construction-related air emissions would be less than significant.

As stated above, the March 2022 Air Quality Technical Memorandum analyzed a previous Project design which included a subterranean parking level with 44 parking spaces. As such, long-term emissions analyzed in the Air Quality modeling included mobile source emissions (i.e., motor vehicles), in addition to energy emissions (e.g., electricity and natural gas usage) and area source emissions (e.g., consumer products, architectural coatings, and landscaping equipment). Operational pollutant emissions are shown in **Table 6**, below.

**Table 6**  
**Long-Term Operational Air Emissions**

Emissions Source	Pollutant (lbs/day) <sup>1</sup>					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Proposed Project Winter Emissions<sup>2</sup></b>						
Area Source Emissions	31.43	2.43	66.19	0.15	8.61	8.61
Energy Emissions	0.04	0.30	0.13	<0.01	0.02	0.02
Mobile Emissions <sup>3</sup>	1.07	1.17	10.77	0.02	2.68	0.73
<b>Total Emissions<sup>4</sup></b>	<b>32.53</b>	<b>3.90</b>	<b>77.10</b>	<b>0.17</b>	<b>11.32</b>	<b>9.36</b>
<b>Proposed Project Summer Emissions<sup>2</sup></b>						
Area Source Emissions	31.43	2.43	66.19	0.15	8.61	8.61
Energy Emissions	0.04	0.30	0.13	<0.01	0.02	0.02
Mobile Emissions <sup>3</sup>	1.09	1.08	11.00	0.02	2.68	0.73
<b>Total Emissions<sup>4</sup></b>	<b>32.55</b>	<b>3.81</b>	<b>77.32</b>	<b>0.17</b>	<b>11.32</b>	<b>9.36</b>
SCAQMD Threshold	55	55	550	150	150	55
<b>Is Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Notes:						
<ol style="list-style-type: none"> <li>1. Emissions were calculated using CalEEMod, version 2020.4.0. Totals represented in table may be slightly off due to rounding.</li> <li>2. The Project would include energy-efficient project design features, including an all-electric design (i.e., no natural gas hookups) and would be 5 percent more efficient than 2019 Title 24 standards. To provide a conservative analysis, these energy-efficient project design features were not accounted for in CalEEMod.</li> </ol>						
Source: Refer to Appendix A, <i>Air Quality Emissions Data</i> , of the Air Quality Technical Memorandum (see <b>Appendix C</b> ) prepared for this Project for detailed model input/output data.						

As indicated in **Table 6**, above, criteria pollutant emissions during operation of the Proposed Project would not exceed the SCAQMD significance thresholds. Thus, operation-related air emissions impacts would be less than significant. As such, because the Proposed Project would result in long-term and short-term emissions below the SCAQMD thresholds, the Project would not have the potential to cause a violation of the ambient air quality standards.



As mentioned, because AQMP consistency criterion 1 pertains to pollutant concentrations, rather than to total regional emissions, an analysis of the Project's pollutant emissions relative to localized pollutant concentrations is also used for evaluating project consistency. As stated in the Air Quality Technical Memorandum prepared for this Project, localized significance thresholds (LSTs) only apply to the operational phase of a project if the project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). Since the Project does not include such uses, an LST analysis is not necessary for Project operation. However, Project construction would result in on-site emissions, including off-road construction equipment emissions and fugitive dust. **Table 7**, below, displays the LST of construction emissions for the Proposed Project, as well as the SCAQMD LST screening thresholds for determining significance.

**Table 7  
Localized Significance of Construction Emissions**

Maximum Emissions	Pollutant (pounds/day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Year 1	20.03	17.17	0.95	0.71
Year 2	12.98	14.02	0.61	0.56
<b>Maximum Daily Emissions</b>	<b>20.03</b>	<b>17.17</b>	<b>0.95</b>	<b>0.71</b>
<i>LST Mass Rate Screening Criteria<sup>2</sup></i>	69	535	4	3
<b>Screening Thresholds Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Note: 1. The LST Mass Rate Screening Criteria were determined using Appendix C of the SCAQMD <i>Final Localized Significant Threshold Methodology</i> guidance document for pollutants NO <sub>x</sub> , CO, PM <sub>10</sub> , and PM <sub>2.5</sub> . The LSTs are based on the anticipated daily acreage disturbance for construction (1 acre), the distance to sensitive receptors, and the source receptor area (SRA 8). 2. The nearest sensitive use is the homeless services housing located immediately west of the Project Site, so the LST mass rate screening criteria for 25 meters were used in this analysis as those criteria represent the most conservative.				

As seen in **Table 7**, emissions would not exceed the LST screening thresholds for source receptor area 8 (SRA 8), which includes the Project Site. Construction LST impacts would be less than significant in this regard. Therefore, because both Project-related emissions of criteria pollutants and construction-related localized pollutant emissions would be less than significant, the Project would be consistent with criterion 1 of the SCAQMD's AQMP consistency evaluation process.

As stated above, the second AQMP consistency criterion determines whether a project would be consistent with the population, housing, and employment growth projections, as well as land use strategies utilized by the AQMP. In the case of the 2016 AQMP, four sources of data form the basis for the projections of air pollutant emissions: the City of Pasadena General Plan, the CDSP, SCAG's regional growth forecast, and the SCAG RTP/SCS. The RTP/SCS also provides socioeconomic forecast projections of regional population growth. As stated above, the Project would be consistent with the City's Zoning Code and the CDSP and is consistent with the types, intensity, and patterns of land use envisioned for the site vicinity. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City. As the SCAQMD has incorporated these same projections into the 2016 AQMP, it can be concluded that the Proposed Project would be consistent with the projections, and would therefore meet the second AQMP consistency criterion.

Regarding sensitive receptors (which are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses), the closest sensitive receptor is the Centennial Place/YMCA building immediately west of the Project Site. To identify impacts to sensitive receptors, the SCAQMD recommends addressing SCAQMD's LSTs for construction impacts (on-site emissions only) and operations impacts (only if the project includes stationary sources or attracts idling vehicles). As shown above, construction-related emissions would not exceed the LST screening thresholds established by the SCAQMD and Project operations would not include stationary sources or attract idling vehicles. Therefore, LST impacts would be less than significant.

Finally, the Proposed Project would not cause any significant odor impacts. Land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Proposed Project would not include any of these uses. While construction activities may generate detectable odors from heavy-duty equipment exhaust and architectural coatings, construction-related odors would be short term in nature and would cease upon Project construction completion. Further, existing state and regional regulations, such as state codes limiting idling time of construction equipment and SCAQMD's Rule 1113, which minimizes odor impacts from architectural coatings, would ensure that any odor impacts associated with the Proposed Project would be less than significant.

As previously stated, the above Air Quality analysis reviewed a previous version of the Project, which included 111 residential units and a subterranean parking level that included 44 parking spaces. The Project, as proposed, would result in construction of fewer units than this previous design and eliminates the subterranean parking level. Subsequently, criteria pollutant emissions during construction and operation are anticipated to be lower than previously analyzed Project design, as there would be less intensive construction activities (e.g., less grading required due to elimination of a subterranean level), fewer vehicle trips generated during operation, and less energy consumption during operation. The Proposed Project would be consistent with the General Plan and 2016 AQMP as the land use type is the same as the previously analyzed Project design and the Project proposes fewer residential units than the previous design. The Proposed Project would not change the level of impacts in regard to carbon monoxide hotspot and odor. As such, the Proposed Project would not result in significant impacts on air quality.<sup>12</sup>

#### *Water Quality*

The Project Site is located within an urban setting and is currently characterized by a disturbed, vacant lot and an existing single-story masonry block storage structure. Given this past disturbance, the Project Site is effectively a flat urban lot that is predominantly pervious with limited areas of impervious surfaces. The Project would represent an increase in the amount of impervious surfaces on the Project Site; however, stormwater quality would be managed through compliance with local and regional controls. Specifically, storm-related erosion of uncovered soils during construction activities would be prevented by complying with the City's best management practices (BMPs) outlined in Pasadena's Municipal Code, which aim to prevent erosion and prevent loose soils from washing off-site during construction. Specifically, these BMPs include prohibitions on construction or industrial vehicle washing, requirements for storing soil on-site so as to minimize sediment erosion, and requirements to clean up materials tracked off-site within the same day during the rainy season (October 15 through April 15). Specifically, the Project would

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<sup>12</sup> Michael Baker International, Addendum to Air Quality and Noise Analyses, September 9, 2022.

include installation of fiber rolls along the entire Project Site boundary to reduce erosion of topsoil off the site, as well as installation of two rows of sandbags (three bags high) along the Project Site's frontage with the Centennial Place/YMCA building. The Project Site entrance used during construction, located at the existing driveway on the north-central portion of the Project Site, would include an erosion and sediment control feature, including corrugated steel panels to remove soil from construction vehicle tires when exiting the site.

Once occupied, the Project Site would be covered by either impervious surfaces or managed gardens/turf areas and, thus, would not be susceptible to erosion or siltation. Further, drains in the central courtyard area would collect stormwater and convey it to a central drywell within the open space at the northeast corner of the Project Site to allow stormwater percolation into the ground prior to discharge to the City's urban stormwater network. Therefore, because the Project would be required to comply with existing local and regional water requirements, and because of proposed stormwater design measures, the Project would result in less than significant impacts related to water quality.

### Utilities and Public Services

The Project Site is currently served by electric, natural gas, trash, water, and wastewater services. The proposed structure would require new service connections for electricity, water, wastewater, and natural gas services, which would be undertaken during the construction period and could occur within the Project Site. Water and electricity services to the Proposed Project would be provided by the Pasadena PWP. For wastewater services, the City of Pasadena operates and maintains its own sanitary sewer system, consisting of gravity pipelines that convey approximately 14 million gallons per day (gpd) of untreated wastewater to the Los Angeles County Sanitation Districts (Sanitation Districts) trunk sewer system. The Project's wastewater would be conveyed through the sewer system, which includes sanitary sewer lines located within Ramona Street and Garfield Avenue, to the Sanitation Districts' system of water reclamation plants (WRPs), including the Whittier Narrows WRP, located at 301 North Rosemead Boulevard in South El Monte (approximately 9 miles southeast of the Project Site), which has a treatment capacity of 15 million gpd. The Project Site is located within the tributary area of this WRP. The treated wastewater would be reused at either the WRP, the Upper San Gabriel Valley Municipal Water District, or for groundwater recharge into the Rio Hondo and San Gabriel Coastal Spreading Grounds.

The Project, with 106 residential units, would generate approximately 16,536 gpd of wastewater.<sup>13</sup> The Project's increase in wastewater generation, as compared with existing conditions, would be a small fraction of the Sanitation Districts' existing WRP capacity. Further, the City's Sewer System Management Plan includes a System Evaluation and Capacity Assurance Plan, where the long-term needs of the City's sewer infrastructure are periodically reviewed and addressed through capital improvement projects such as increases in pipe sizes and storage capacities, and ensuring system redundancy. This long-term planning ensures that the City's sewer system has capacity to meet growth within the service area. The City's Public Works Department uses the General Plan to assist with long-term sewer infrastructure planning efforts. Given the Project's consistency with the General Plan and CDSP, and given the treatment capacity of the Whittier Narrows WRP, the City's sewer infrastructure has sufficient capacity to serve the Proposed Project.

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<sup>13</sup> Los Angeles County Sanitation Districts, Will Serve, Table 1: Loadings for Each Class of Land Use, undated. Using the Sanitation Districts' loading factor of 156 gpd per unit, the residential component would have a wastewater generation of approximately 16,536 gpd (156\*106).

Regarding water supply, according to the latest PWP Urban Water Management Plan (UWMP), in 2020, PWP supplied 29,290 acre-feet of water to serve its 38,421 customer accounts (approximately 170,400 people).<sup>14</sup> Population growth in the Pasadena area is expected to be approximately 0.5 percent per year between 2020 and 2040. **Table 8**, below, outlines projected supply and demand totals during a multiple dry-year scenario.

**Table 8**  
**2025-2040 Supply and Demand Projections Under Multiple Dry-Year Scenario**  
**(acre-feet per year)**

	<b>Water Supply Projections (acre-feet per year)</b>			
	<b>2025</b>	<b>2030</b>	<b>2035</b>	<b>2040</b>
Groundwater	11,830	11,830	11,830	11,830
Imported Water	19,703	20,113	20,217	20,300
Supply Total	31,553	31,943	32,047	32,130
	<b>Water Demand Projections (acre-feet per year)</b>			
	<b>2025</b>	<b>2030</b>	<b>2035</b>	<b>2040</b>
Demand Total	26,750	25,000	25,320	25,630
<b>Difference</b>	<b>4,803</b>	<b>6,943</b>	<b>6,727</b>	<b>6,500</b>

Source: PWP, 2021.

Projected imported water supplies shown in **Table 8** are based on projected demands for imported water represented in the Metropolitan Water District of Southern California's most recent UWMP. The projected decrease in water demand between 2025 and 2030 is due to mandated water reductions associated with Senate Bill 606 and Assembly Bill 1668, which require a reduction in indoor residential water use from 57 gallons per capital per day (gpcd) to 50 gpcd by 2030. Additionally, the state is required to establish outdoor targets and water loss reductions for which final rules are not yet available. The PWP's UWMP assumes that these reductions will equal at least 2,100 acre-feet per year by 2030. Further, the demand projections shown in **Table 8** are conservatively estimated, given that the demand projections do not account for additional planned water savings from the PWP's water conservation programs, including water waste prevention ordinances, metering, conservation pricing, public education and outreach, and other programs to assess and manage water system losses.

Water demand from the Proposed Project can be estimated to be similar to the Project's estimated wastewater generation, considering both that there are not large areas of irrigated landscaping and that proposed irrigation systems would need to comply with water efficiency measures in the Pasadena Municipal Code and California Building Code. Therefore, it can be reasonably assumed that potable water used by the Project during operation would be captured by wastewater drains. Therefore, with a water demand of 16,536 gallons per day, or 18.5 acre-feet per year, the Project would represent approximately 0.4 percent of the projected water surplus in 2025 and 0.3 percent of the projected water surplus in 2040. Additionally, the UWMP uses the Pasadena General Plan's planned growth and development in the City to anticipate future water consumption within the City.<sup>15</sup> As such, since the Project would be consistent with its underlying zoning and General Plan designation, and since the UWMP demonstrates adequate

<sup>14</sup> City of Pasadena, Department of Water and Power, 2020 Urban Water Management Plan, June 2021.

<sup>15</sup> City of Pasadena, Department of Water and Power, 2020 Urban Water Management Plan, June 2021.

water supply for all normal and dry year scenarios through the plan's horizon year (2040), the Project's water demand could be adequately served by PWP.

Electricity service is provided to the Project Site by PWP, whose existing portfolio of resources includes renewable energy (29 percent), coal (39 percent), large hydroelectric (5 percent), natural gas (10 percent), nuclear (9 percent), and unspecified power sources provided by a combination of owned and contracted energy resources.<sup>16</sup> This mix of resources enhances electrical system resilience by not relying on a single transmission source. PWP's 2018 Power Integrated Resource Plan has a primary objective of system reliability and includes a resource procurement plan that states that "PWP is fully resourced for energy needs until 2025" and that PWP will "likely meet future energy needs through wind and solar resources, as well as a mix of shorter-term renewable contracts."<sup>17</sup> Therefore, PWP's long-term forecasts for electricity demand within its service area, which includes the Project Site, would account for Project-related electricity demand through PWP's demand forecast modeling. In short, PWP's long-term planning would ensure that the City's electrical grid would have adequate capacity to support the Proposed Project.

The Project Site is already served by electrical conduits, such as a conduit that connects the existing storage structure on the Project Site to existing electrical utilities located within Ramona Street and the Centennial Place/YMCA building to the west. As such, the Project would not require construction of additional electrical infrastructure beyond the boundaries of the Project Site other than the connections to this existing electrical infrastructure.

Natural gas service is provided to the Project Site by Southern California Gas Company (SoCalGas), which is the principal distributor of natural gas in Southern California. SoCalGas projects that total natural gas demand will decline at an annual rate of 0.74 percent from 2018 to 2035 due to aggressive energy efficiency standards. Further, SoCalGas is anticipated to meet a projected demand of 2,753 million cubic feet of natural gas per day in 2022 through a combination of withdrawals from underground storage facilities and flowing pipeline supplies. Regardless, the Project would not include natural gas connections as heating and cooking but would rely on electricity. As such, the Project would not result in an increase in natural gas usage on the Project Site.

Regarding solid waste collection, the City of Pasadena does not collect solid waste from multifamily residential units containing five or more units unless upon written request by the property owner. As such, trash collection services would be provided by the City or a private, commercial trash collection company approved by the City. According to CalRecycle's Solid Waste Information System facility database, one of the largest landfills in the Pasadena area is the Scholl Waste Landfill (located at 3001 Scholl Canyon Road in Glendale, California), which has a total remaining capacity of 9,900,000 cubic yards. The solid waste generated by the Proposed Project would be typical of the types of wastes generated by multifamily residential land uses throughout the City of Pasadena. Nothing inherent in the Project description or in the type or intensity of land use would indicate that the Project would generate a higher-than-normal level of typical municipal solid waste, or that it would generate any unique or hazardous types of wastes requiring unusual disposal methods.

Franchise haulers that serve multifamily residential properties in the City of Pasadena offer recycling programs. Additionally, the City of Pasadena's 2014 Zero Waste Strategic Plan has short-

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<sup>16</sup> City of Pasadena, Department of Water and Power, 2020 Power Content Label, August 2021.

<sup>17</sup> City of Pasadena, Department of Water and Power, Power Integrated Resource Plan, 2018, p. 69.

and long-term initiatives to reach the goals of reducing waste generation and increasing recycling and composting within the City. The Zero Waste Strategic Plan states that implementation of the initiatives included in the plan would allow the City to achieve 87 percent waste diversion (i.e., diverting waste from landfills to other end uses, such as recycling and composting). Other initiatives include expanding recycling in public areas, optimizing construction and demolition diversion requirements to divert the maximum amount of construction and demolition debris, and expanding the multifamily and commercial recycling program. Further, the City of Los Angeles offers a household hazardous waste disposal program for residents of Los Angeles County, which disposes of household hazardous waste, such as electronic waste, household cleaning chemicals, paints, medications, and batteries.

Therefore, given that there is existing landfill capacity, and that the Cities of Pasadena and Los Angeles administer recycling and household hazardous waste disposal programs, the Project would not result in significant impacts related to solid waste or recycling services in the City.

The Project would also incrementally increase the demand for public services, such as fire protection and emergency medical services, police protection, and other public services (such as parks and libraries). Because the Project would provide housing for seniors, the Project would not have any impact on area schools as no school-aged children would reside on-site. The Pasadena Fire Department (PFD) would provide fire protection and emergency medical services. Project building plans would be reviewed by the PFD for compliance with applicable safety and emergency access standards, such as circulation standards and ensuring the facility has adequate fire flow and fire hydrant placement. The PFD has eight stations located throughout the 23-square-mile service area, the nearest of which to the Project Site is Station No. 31, located approximately 2,200 feet southwest. According to the General Plan, equipment available at Station No. 31 includes one fire truck company, one fire engine company, and one rescue ambulance and 10 daily staff. Total daily staffing at the eight stations is 51 firefighting personnel, including paramedics. The Project Site is located within a fully urbanized area with an urban street network, a fully pressurized water system, and managed landscaping limited to decorative trees, shrubs, and ground cover. Further, the Project Site is not located within or adjacent to a Very High Fire Hazard Severity Zone as designated by the California Department of Forestry and Fire Protection's Fire and Resource Assessment Program.<sup>18</sup>

The Pasadena Police Department (PPD) would provide law enforcement services to the Project. The PPD's service area includes the City of Pasadena, where services such as emergency response, community services, aerial patrol response, criminal investigations, field operations, and non-emergency support services are provided. The PPD has specialized units, such as Park Safety units, K-9 units, and homeless outreach units, that service five community service areas. The Project Site is located within the West community service area. The nearest police station is at the southwestern corner of the intersection of Walnut Street and Garfield Avenue, approximately 300 feet north of the Project Site.

While the Proposed Project would result in an increase in population as compared with existing conditions, it would not be a significant increase, as described above. Additionally, the Project, being similar in size and scale to surrounding development, would not present any unique features or operational aspects that could reasonably be expected to result in an increased need for fire protection or police services. Additionally, Project building plans would be reviewed by the PFD

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<sup>18</sup> California Department of Forestry and Fire Protection, Very High Fire Hazard Severity Zones in LRA, Pasadena, September 2011.

prior to issuance of building permits for compliance with applicable safety and emergency access standards, such as circulation standards and ensuring the facility has adequate fire flow and fire hydrant placement. Therefore, given the PFD's review of the Project plans as part of the City's approval process, and given the Project's consistency with the Project Site's General Plan designation, the Proposed Project would not adversely impact fire protection services in the City. Further, the City states in the existing General Plan EIR that impacts to police services associated with buildout of the General Plan are anticipated to be adequately funded by an increase in tax revenues over time, relative to the increase in development intensity.<sup>19</sup> Additionally, the City's General Plan Land Use Element includes Policy 16.2, which states that the City will "periodically review the impacts of major physical, environmental, economic, and social changes identifying their implications in meeting the service needs of Pasadena's residents."

Therefore, because the Project would be consistent with the Project Site's zoning and General Plan designation, the level of growth associated with the Project would be consistent with the City's long-term growth planning. As such, the Project would result in less than significant impacts related to utilities and public services.

### **Considerations of Exceptions to the Use of a Categorical Exemption**

Section 15300.2 of the CEQA Guidelines identifies the following exceptions to the use of a categorical exemption:

- a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located—a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.
- b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.
- c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
- d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including, but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.
- e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.
- f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

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<sup>19</sup> City of Pasadena, Pasadena General Plan Environmental Impact Report, January 2015.

As evaluated below, none of these exceptions apply to the Proposed Project. Therefore, the lead agency (the City of Pasadena) is not precluded from categorically exempting the Proposed Project from CEQA.

### Location

The location exception does not apply to the Class 32 categorical exemption. Regardless, the Project site is not within a particularly sensitive environment and there are no designated environmental resources of hazardous or critical concern on the site or in the vicinity. The Project Site is a partially vacant/partially developed urban lot that is surrounded by residential and institutional development.

### Cumulative Impact

Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. Within the immediate vicinity of the Project Site, the nearest large project is the proposed conversion of the YWCA building, located at 78 North Marengo Avenue, across Holly Street from the Project Site (approximately 160 feet south). The next nearest project to the Project Site is the seismic retrofit of the Pasadena Main Library (located approximately 550 feet north). Construction of these projects is not anticipated to occur at the same time as construction of the Proposed Project. As described below, the Proposed Project and related projects would not result in any significant cumulative impacts.

As stated above, the Project's construction- and operation-related noise would not generate noise levels that would exceed the City's noise standards at the closest sensitive receptors. Further, Project-related construction activities are not anticipated to occur concurrently with the construction of the nearby projects identified above. As such, the Project would have a less than significant cumulative noise impact. With regard to air quality, the SCAQMD considers projects that are consistent with the AQMP to have a less than significant cumulative air quality impact. As stated above, and as further described in the Air Quality Technical Memorandum prepared for this Project, the Project would be consistent with the AQMP. As such, the Project would not result in cumulatively considerable air quality or noise impacts.

The CEQA transportation analysis conducted for the Project, as discussed above, considered five measures of the Project's effect on the citywide circulation system. By their nature, the City's CEQA transportation analyses are cumulative analyses, as they evaluate changes in citywide measurements of VMT/capita, VT/capita, access to the bicycle and transit networks, and pedestrian accessibility. As shown above, the Project's transportation impacts, as measured against these cumulative metrics, would be less than significant.

The historical resources technical report prepared for the Project, discussed in the Historical Resources section of this document below, considered two related projects located within the Pasadena Civic Center Historic District as part of the cumulative impacts analysis.<sup>20</sup> These two projects include the Pasadena YWCA rehabilitation and related new development project (which involves the rehabilitation and adaptive reuse of the YWCA building located across Holly Street from the Project Site and the construction of a related new building immediately to the east of the YWCA) and the Pasadena Public Library project (which involves seismic upgrades and rehabilitation to the Pasadena Public Library, which is located at 285 East Walnut Street). As discussed below, the Project's impacts on the Pasadena Civic Center Historic District would be

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<sup>20</sup> Historic Resources Group, Historical Resources Technical Report, April 18, 2022.



less-than-significant and the Project would not cause a substantial adverse change to any identified historical resources in the Project vicinity (defined as all parcels immediately adjacent to or across from the Project Site) such that their historic integrity or significance would be materially impaired. The historical resources technical report determined that because the YWCA project would not further materially impair the YWCA building or the Pasadena Civic Center Historic District, the project would not result in any additional impacts beyond those associated with the project that would be cumulatively considerable. Further, because the Pasadena Public Library project is limited to the seismic upgrading and rehabilitation of the Pasadena Public Library building and because the City's design review process requires that the project conform with the Secretary of the Interior's Standards for Rehabilitation, the Pasadena Public Library will retain its eligibility as a contributor to the Pasadena Civic Center Historic District following completion of the seismic upgrades and rehabilitation activities. Therefore, the Proposed Project, in combination with related projects described above, would not materially alter in an adverse manner the significance of a historical resource, or have a cumulatively considerable impact on the significance of a historical resource. Based on the analysis herein, the Project would not considerably contribute to any significant impacts resulting from successive projects of the same type in the same place over time.

#### Significant Effect Due to Unusual Circumstances

There are no features that distinguish this Project from others in the exempt class; therefore, there are no unusual circumstances. Multifamily residential developments are common in Pasadena and the CDSP allows and encourages mixed-use development within the CDSP area. Further, the Project Site is located within an urbanized area and has been disturbed by past uses. Phase I and Phase II Environmental Site Assessments (ESA) prepared for the Project Site have determined that past uses on and near the Project Site have not led to any recognized environmental conditions (REC) that would preclude the Project Site's use for residential land uses. Given that the Project would be constructed on a site that has been previously developed, that the Project would be consistent with the development pattern in the area, and that the City regularly considers applications for affordable housing development projects as a normal course of business, there are no unusual circumstances.

#### Scenic Highways

The only designated state scenic highway that traverses the City of Pasadena is the Angeles Crest Highway (State Highway 2), which is located north of Arroyo Seco Canyon in the extreme northwest portion of the City.<sup>21</sup> The majority of the designated scenic highway segment of Angeles Crest Highway is within the Angeles National Forest. The Project site is more than 5 miles from the closest segment of the Angeles Crest Highway and the Project site does not contain any scenic resources that contribute to views from this scenic highway.

The segment of I-210 between State Route 134 on the south and I-5 on the north has been classified by Caltrans as an "eligible" scenic highway.<sup>22</sup> This portion of I-210 has views of scenic resources that include the San Gabriel Mountains and open space to the north and west of I-210. The Project Site is located approximately 3,600 feet southeast of I-210 and is not visible by motorists traveling on this highway due to an existing berm and sound wall on the east side of the interstate, as well as an existing mature landscape between the interstate and the Project Site. Further, the scenic views from the portion of I-210 nearest the Project Site are of the San Gabriel Mountains to

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<sup>21</sup> California Department of Transportation, List of Designated and Eligible State Scenic Highways, 2017.

<sup>22</sup> California Department of Transportation, List of Designated and Eligible State Scenic Highways, 2017.

the north, which would not be obstructed by Project-related development to the southeast. Therefore, the Project would have no impact on scenic resources within a state scenic highway.

### Hazardous Waste Sites

In the State of California, Section 65962.5 of the Government Code requires that the California Department of Toxic Substances Control (DTSC), the California Department of Public Health (CDPH), and the State Water Resources Control Board (SWRCB) compile lists of all hazardous waste facilities subject to corrective action; all sites included in the Abandoned Site Assessment Program; all drinking water wells that contain detectable levels of organic contaminants; all underground storage tanks with unauthorized releases; and all solid waste disposal sites with a migration of hazardous materials.

The Project Site is not included on any of the above-described lists compiled by the DTSC, CDPH, or the SWRCB.<sup>23</sup> The DTSC maintains the EnviroStor database, which provides a list of all hazardous waste sites, as required by Section 65962.5 described above, as well as information about other sites that are under investigation of reported hazardous substance contamination and past cases where contamination was identified at a site and properly removed.

Additionally, a Phase I ESA was completed for this Project by Leighton and Associates, Inc. on December 9, 2021. The purpose of the Phase I ESA is to identify RECs, historical RECs (HRECs), or controlled RECs (CRECs) associated with the Project Site. An REC is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.<sup>24</sup> An HREC is defined as the past release of any hazardous substance or petroleum product that has occurred in connection with a property and has been addressed to the satisfaction of the applicable regulatory authority, without subjecting the property to any required controls. A CREC is similar to an HREC, only the hazardous substances were allowed to remain in place subject to required controls regarding use of the site.

Historically, the Project Site was home to a few residential structures and outbuildings from the 1880s through the mid-1900s. In the 1920s, a YMCA gymnasium was located in the center of the Project Site, with the residential uses remaining in place. From the 1920s to the 1940s, the eastern and southern portions of the Project Site were landscaped areas (as is the case today). The small gymnasium in the center of the Project Site was removed and replaced by a new YMCA structure to the west and a handball court on the west-central portion of the Project Site. The Phase I ESA states that the existing masonry structure and the existing weather station are visible in aerial imagery by the early 1950s. A parking structure was constructed in the center of the Project Site in the 1960s. This parking structure, and the handball court, were removed in the 1990s and the Project Site has remained unchanged since.

The Project vicinity is listed in the environmental databases search report prepared as part of the Phase I ESA. This listing is for the YMCA, which formerly occupied the property adjoining the west boundary of the Project Site, as well as a portion of the Project Site itself. The listings are reported

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<sup>23</sup> California Department of Toxic Substances Control, EnviroStor, accessed December 27, 2021, <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=Pasadena%2C+CA>; State Water Resources Control Board, GeoTracker, accessed December 27, 2021, <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Pasadena%2C+CA>.

<sup>24</sup> ASTM E1527-13

in the Statewide Environmental Evaluation and Planning System (SWEEPS) underground storage tank (UST) database.<sup>25</sup> The SWEEPS UST database indicates a possible UST is/was at the Project Site. The Phase I ESA notes that one record was found with the PFD showing that a 2,000 gallon UST of what was likely petroleum fuel was removed from the Project Site in February 1989.

A site visit was conducted in November 2021. No evidence of hazardous substances, drums, or other chemical containers were observed, with the exception of small containers of fuel and other products used to operate and maintain landscaping equipment in the small concrete block structure on the site. Further, no evidence of current or former above or underground storage tanks (USTs) containing hazardous substances or petroleum products was observed; however, a truncated vertical pipe was observed just below the ground surface at a central location on the site, in the dirt lot portion currently used for vehicle parking. The Phase I ESA states that a steel pipe of this diameter is common for a vent line associated with a UST. The presence of this truncated pipe, together with other evidence indicating a former UST at the site, is a potential environmental concern. UST removals conducted in the late 1980s and 1990s often did not include the removal of all piping, such as vent lines. As such, the Phase I ESA recommended further investigation of this area to determine the potential for contamination from former uses.

Further, the Phase I ESA identified two off-site uses that were judged to have a low to moderate likelihood of creating an REC on the Project Site: a former dry cleaners at 135 North Marengo (approximately 130-230 feet west of the Project Site) and a former gas station and auto repair use at 150 North Marengo (approximately 100 feet northwest of the Project Site). These former nearby uses, as well as the UST removed from the Project Site in 1989, led the Phase I ESA to recommend preparation of a soil gas assessment in the western and northern portions of the Project Site.

Based on the findings/recommendations in the Phase I ESA, a Phase II ESA was prepared for the Project in February 2022, which involved a geophysical survey for potential UST features, collection of soil samples from four borings to assess soil conditions, installation and sampling of soil gas at eight locations, and exploratory trenching near the steel pipe that was suspected of being a vent pipe for a UST. The Phase II ESA determined that the geophysical survey revealed no anomalies which were likely to be a UST pit, indicating that the pipe suspected of being a vent for a UST was not connected to another area or any subsurface feature at the Project Site. Further, subsurface trenching found no evidence (visual or olfactory) to indicate the presence of UST-related piping or soil impacted by petroleum fuel release. Further, the soil samples taken from the Project Site did not include PCBs, CHs, OCP, or TPHs at levels above US Environmental Protection Agency or DTSC's screening levels. Additionally, soil gas samples had minor detections of 12 VOC compounds; however, all detections were below US Environmental Protection Agency and DTSC residential soil gas screening levels. Therefore, the Phase II ESA prepared for the Project determined that the Project Site would not represent a significant risk for future residential occupants and that no further investigation is recommended.

Therefore, because the Project is not listed on the hazardous waste/substances site list compiled pursuant to Section 65962.5 of the California Government Code, this exception does not apply to the Project.

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<sup>25</sup> The SWEEPS UST listing was updated and maintained by a company contacted by the SWRCB in the early 1990s. While the listing is no longer updated or maintained, a local regulatory agency can provide more information on a site included on the SWEEPS list.

## Historical Resources

Section 15300.2 of the CEQA Guidelines states that a categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource. CEQA Section 15064.5(b) states:

A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

(1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

(2) The significance of an historical resource is materially impaired when a project:

- (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code; ... or
- (C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

(3) Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings ... shall be considered as mitigated to a level of less than a significant impact on the historical resource.

The following paragraphs summarize the findings of the historical resources technical report prepared by Historic Resources Group for the Project, available as **Appendix D** of this report, which investigates the Project Site and Project vicinity (defined as all parcels immediately adjacent to or across from the Project Site) to identify all historical resources as defined by CEQA which could be subject to Project-related impacts.<sup>26</sup> Pasadena Civic Center Historic District is listed in the National Register of Historic Places (National Register) and the California Register of Historical Resources (National Register), and thus is a historical resource under CEQA. The Project Site was previously evaluated as a non-contributor to the Historic District, and according to the historic resources technical report, it does not appear eligible for individual listing on the NRHP or CRHR, or for local

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<sup>26</sup> Historic Resources Group, Historical Resources Technical Report, April 18, 2022.

designation. As such, the Project Site is not a historical resource under CEQA. However, the Project Site contains multiple planning and landscape elements which are identified by HRG as character-defining features of the National Register-listed historic district, including the approximately 45-foot setback along Garfield Avenue; the approximately 36-foot setback along Holly Street; wide decoratively-paved sidewalks along Garfield Avenue and Holly Street; street trees along Garfield Avenue; double rows of trees along Holly Street; ornamental streetlights along Holly Street, Garfield Avenue, and Ramona Street; and the tile drinking fountain at the northeast corner of Holly Street and Marengo Avenue. As character-defining features of a National Register-listed historic district, these features are considered contributing features of a historical resource under CEQA.

Of the nine properties that comprise the Project vicinity, eight were previously evaluated as contributors to the Pasadena Civic Center Historic District, and thus are considered contributing features of a historical resource under CEQA. These include the YMCA Building/Centennial Place, YWCA Building, First Baptist Church, Turner & Stevens Mortuary, American Legion Pasadena Post No. 13, Southern California Gas Co. Building (now George Ellery Hale Building), County Courts Building, and Pasadena City Hall. The Project Vicinity also contains multiple planning and landscape elements, in whole or in part, which are identified herein as character-defining features of the National Register-listed historic district, and are therefore considered contributing features of a historical resource under CEQA. In addition, two properties in the Project vicinity are locally designated individually. Pasadena City Hall is a designated City of Pasadena Landmark, and the YWCA Building is a designated City of Pasadena Historic Monument. As such, both of these properties are historical resources under CEQA, in addition to being contributors to a historic district that is a historical resource under CEQA.

Features on the Project Site that were found to be non-contributing features of the historic district and/or otherwise ineligible for historic listing or designation include the concrete-block storage building, corrugated metal storage unit, weather station, various landscape elements, chain-link perimeter fencing, and various additional trees located throughout the site. Additional properties in the Project vicinity that were previously evaluated as non-contributors to the Pasadena Civic Center Historic District and/or found ineligible for historic listing or designation include the parking structure at 240 Ramona Place/245-281 Ramona Street, the Pasadena Robinson Memorial, the Sister City Trees planted in the landscaped area east of the YWCA property, and the Jo Heckman Memorial Trees planted at the east entrance to City Hall on Euclid Avenue. As such, these features and properties are not considered historical resources for purposes of CEQA.

Based upon these findings, the historical resources technical report prepared for the Project analyzes the Proposed Project for potential impacts to each of the identified historical resources as defined by CEQA within the Project vicinity, including Pasadena City Hall, the YWCA Building, and the Pasadena Civic Center Historic District (including any contributing properties or other character-defining features that have the potential to be impacted by the Project), as well as the adjacent YMCA Building/Centennial Place.

The technical report finds that the Project would not result in a substantial adverse change in the significance of any historical resources located on the Project Site or in the Project vicinity through physical demolition, destruction, relocation, or alteration. The Project would construct a new building within the Pasadena Civic Center Historic District and in the vicinity of Pasadena City Hall and the YWCA Building, each of which are historical resources as defined by CEQA. However, the Project would not result in substantial adverse changes in the significance of any of these historical

resources, as they would continue to convey their significance if the Proposed Project were constructed.

While the above analysis was prepared for a previous Project design, a Memorandum prepared by Historic Resources Group for the Proposed Project, provided in **Appendix D**, documents a review of the Proposed Project design and whether the determinations in the April 18, 2022 report remain valid.<sup>27</sup> The changes in the Project design, as compared with the Project design analyzed in the April 18, 2022 Historical Resources Technical Report, include reduction of the residential unit count from 111 to 106, removal of the proposed subterranean parking level, and aesthetic/design changes to the building, including two tower elements flanking the structure's main entrance and new design details such as tile and metal grillework primarily focused at the southeast chamfered corner.

HRG determined that the building's footprint would remain the same and the reduction in the number of residential units would not affect the previous analysis of impacts to historical resources. The removal of the subterranean parking level would lessen the amount of excavation and below-grade construction occurring immediately adjacent to the YMCA Building/Centennial Place, which may reduce the potential for damage to this historical resource from construction phase vibration. With the construction vibration management plan, as detailed in **Figure 7**, this change would not impact the previous analysis of impacts to historical resources. Finally, the design changes, such as the proposed tower features at the main entrance on the southeast side of the building, and the metal grillework and tile, would not diminish the compatibility of the new building with surrounding historic resources. With these changes, the design of the building remains compatible with the historic district and does not introduce a new or greater level of potential impact as compared with the previous design analyzed in the Historical Resources Technical Report (April 2022). In summary, HRG determined that the proposed building remains compatible with the historic district overall and with its surrounding district contributors. The major elements of the building's design that contribute to its compatibility—including its overall size and scale, building height, massing and articulation, setbacks, architectural style, exterior materials, and orientation onto the plaza—remain largely unchanged and, therefore, the Proposed Project does not introduce a new or greater level of potential impact as compared with the previous design analyzed in the Historical Resources Technical Report dated April 18, 2022.

## Conclusion

As described above, the Proposed Project meets the requirements of Class 32 exemption, as it meets the definition of infill development; would be consistent with the applicable General Plan designation and all applicable General Plan policies as well as with the applicable zoning designation and regulations; occurs within City limits on a Project Site of no more than 5 acres substantially surrounded by urban uses; would be located on a site that has no habitat for endangered, rare, or threatened species; would not result in any significant effects relating to traffic, noise, air quality, or water quality; and could be adequately served by all required utilities and public services. Further, none of the exceptions to the use of a categorical exemption apply to the Project. Therefore, the Proposed Project is categorically exempt from CEQA pursuant to Section 15332 of the State CEQA Guidelines—Class 32, In-Fill Development Projects.

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<sup>27</sup> Historic Resources Group, Memo to Michael Baker International, September 2022.

## **Appendices**

- **Appendix A:** Transportation Impact Analysis, City of Pasadena Department of Transportation.
- **Appendix B:** Noise Technical Memorandum, Michael Baker International.
- **Appendix C:** Air Quality Technical Memorandum, Michael Baker International.
- **Appendix D:** Historical Resources Technical Report, Historic Resources Group (HRG)

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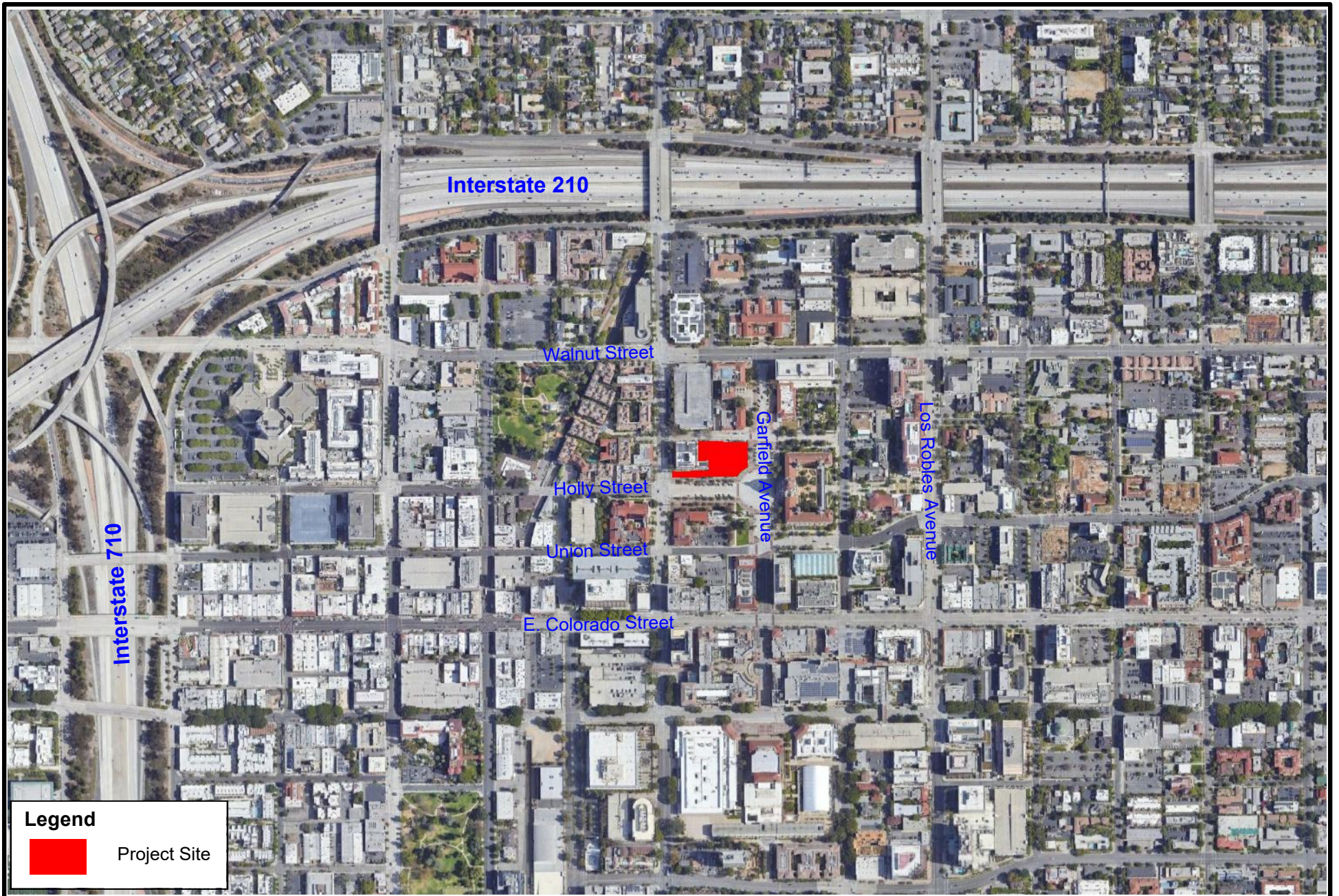


Source: Esri Street Map

**FIGURE 1**

Regional Location Map





Source:

**FIGURE 2**  
Project Location Map





Source:

**FIGURE 3**

Project Site and Surroundings





View of the Project's main entrance, on the southeast side of the Project Site

Source: ONYX Architects, 2022

**FIGURE 4**  
Proposed Project Conceptual Rendering



**SOUTH + CORNER ELEVATION - HOLLY ST**



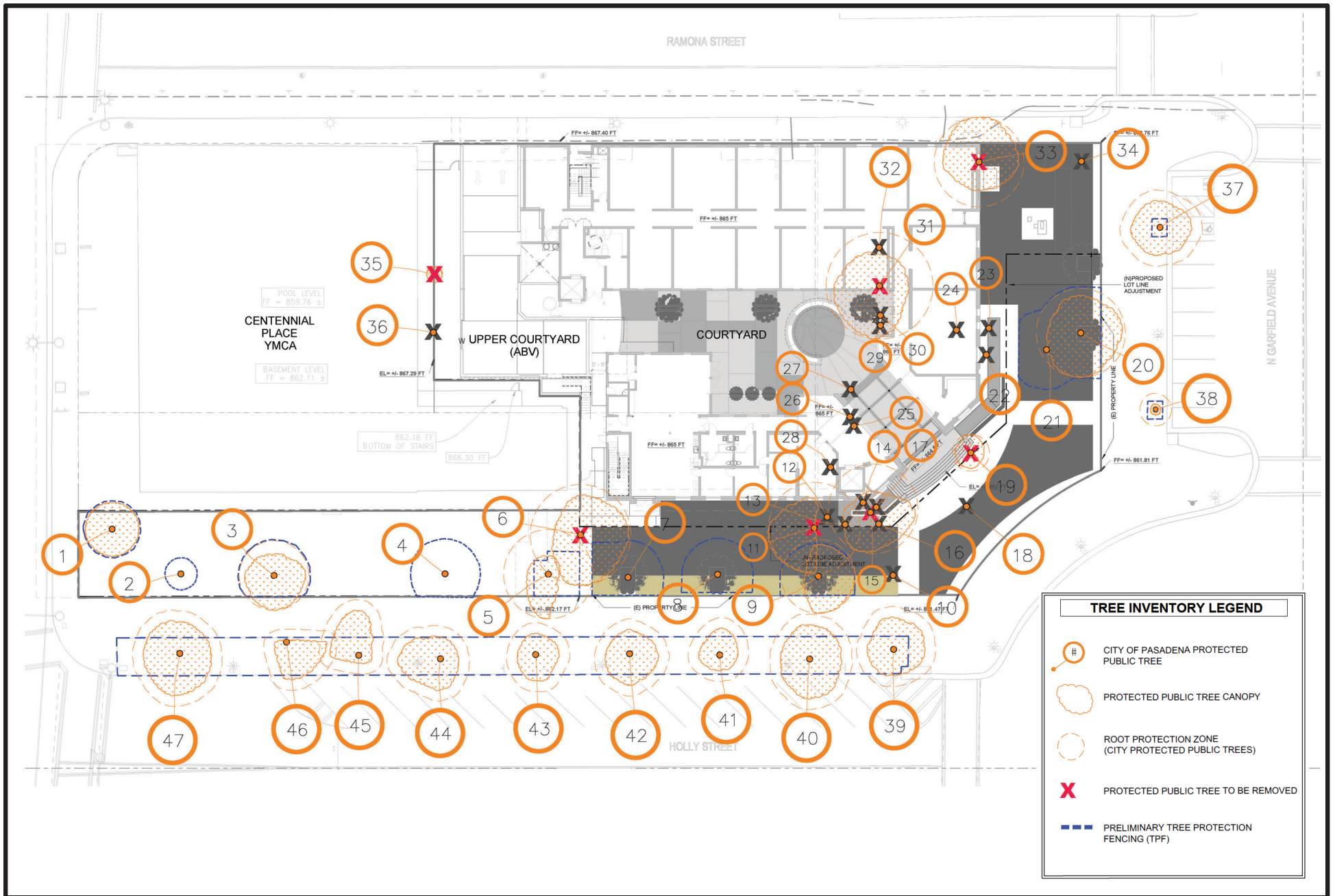
**EAST + CORNER ELEVATION - GARFIELD ST**



**SOUTHEAST CORNER ELEVATION**

Source: ONYX Architects, 2022

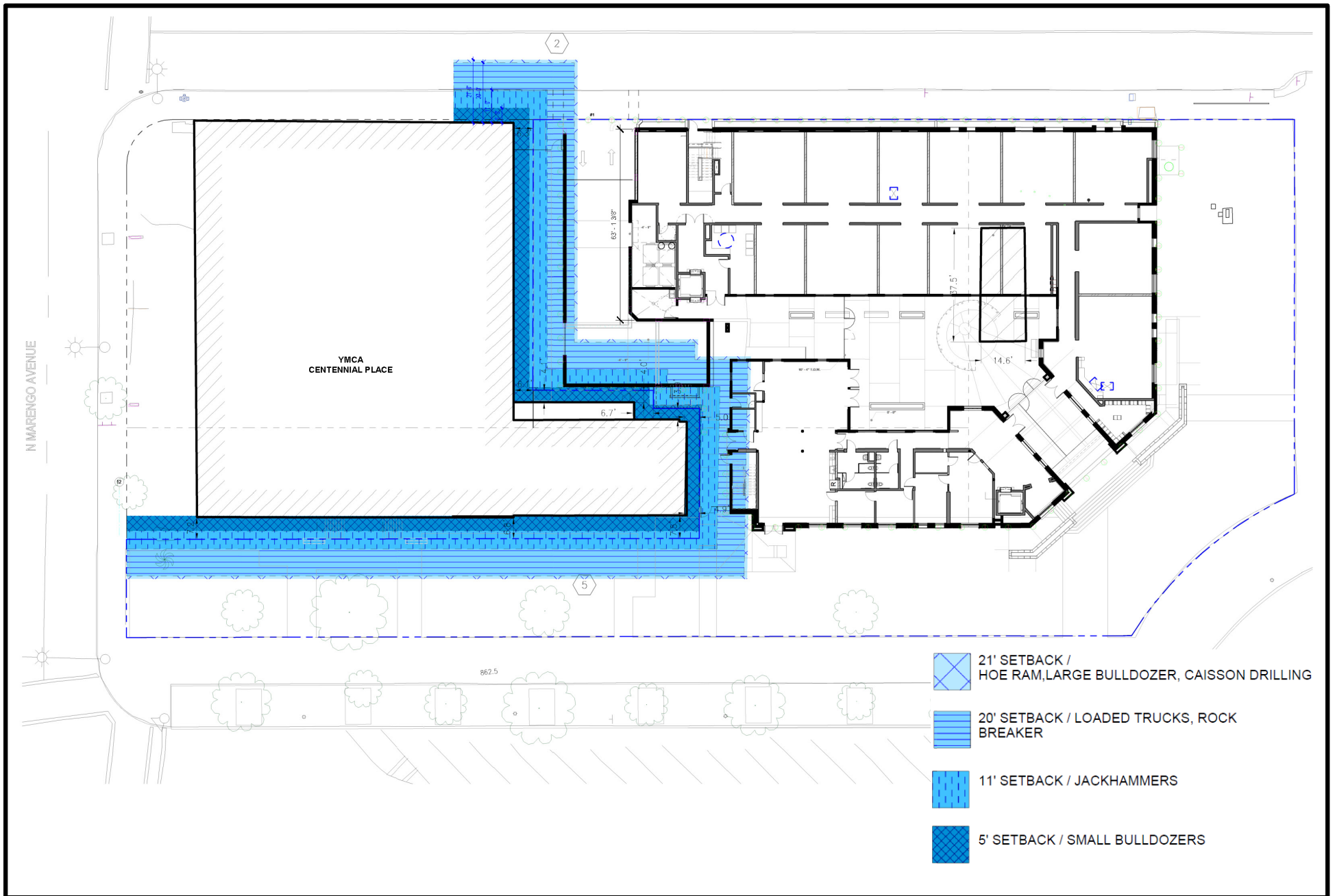
**FIGURE 5**  
Proposed Project Conceptual Elevations



Source: Carlberg Associates Arborists, 2021

**FIGURE 6**  
Protected Tree Exhibit





Source: Onyx Architects, 2022

**FIGURE 7**  
Construction Vibration Management Plan

