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Environmental Assessment
Determinations and Compliance Findings for HUD-assisted Projects
24 CFR Part 58

Project Information

Project Name: 280 Ramona Senior Housing Project

Responsible Entity: City of Pasadena

Preparer: Michael Baker International, Incorporated

Certifying Officer Name and Title: William K. Huang, Director of Housing, City of Pasadena, Housing and Career Services Department

Consultant (if applicable): Michael Baker International, Incorporated

Direct Comments to: James Wong, Senior Project Manager, City of Pasadena, Housing and Career Services Department

Project 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.**

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]**:**

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**.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The 2022 Pasadena Homeless Count Report shows that 512 people experienced homelessness on the day of the homeless count (February 22, 2022). Approximately 15 percent of those experiencing homelessness on that date were over the age of 62. The report states that unhoused seniors are more likely to be chronically homeless than the general population (65 percent versus 59 percent). Further, the report states that "[s]eniors were also much more likely to point to eviction or foreclosure as an event that precipitated homelessness (28% v. 6%). For those evicted, 80% of the evictions occurred in Pasadena." The report also states that these trends "signal a need for targeted financial assistance and housing resources" for seniors.[1] As such, the City of Pasadena wishes to pursue more opportunities for affordable, supportive housing in the City, especially for seniors.

Existing Conditions and Trends [24 CFR 58.40(a)]:

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

[1] Pasadena Partnership to End Homelessness, 2022 Pasadena Homeless Count, Unhoused Seniors, https://www.pasadenahomelesscount.org/post/unhoused-seniors.

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.

Funding Information

The Proposed Project would be funded, in part, through the HUD HOME Investment Partnership program (HOME funds).

Grant Number	HUD Program	Funding Amount
	HOME	$2,756,073

Estimated Total HUD Funded Amount: $2,756,073
Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]**:** $2,756,073

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes ☐ No ☒	HUD guidance states that if a project consists of new construction or other activities that would increase the density of people at the project site, then the record must demonstrate that the project is greater than 2,500 feet from a civilian airport or 15,000 feet from a military airport. According to HUD, if a project is within these distances, then additional design measures may be necessary to protect project residents from airport hazards.

		Airports designated by the Federal Aviation Administration as commercial airports in the National Plan of Integrated Airports are considered civilian airports subject to HUD Regulation 24 CFR 51D. There are no airports within or adjacent to the City of Pasadena. The closest airport to the Project Site is the San Gabriel Valley Airport (previously known as the El Monte Airport), located approximately 7.6 miles southeast of the Project Site. The Bob Hope Airport in Burbank is located approximately 12.4 miles west of the Project Site. As such, the Project Site is not within 2,500 feet of a civilian airport. The nearest military airport to the Project Site is Joint Forces Training Base Los Alamitos, located approximately 24 miles south of the Project Site. As such, the Project Site is not within 15,000 feet (approximately 2.8 miles) of a military airport. The Project Site is greater than 15,000 feet from a military airport and greater than 2,500 feet from a civilian airport. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary. **References**: HUD, HUD Exchange, Airport Hazards, https://www.hudexchange.info/environmental-review/airport-hazards/, accessed December 27, 2021. Federal Aviation Administration, Report to Congress, National Plan of Integrated Airport Systems 2021-2025, Appendix B, September 2020.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes ☐ No ☒	The Coastal Barrier Resources Act prohibits federal assistance within barrier islands that are subject to frequent damage by hurricanes and high storm surges. There are no coastal barrier resources identified by the US Fish and Wildlife Service (USFWS) within the State of California. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary. **References:** US Fish and Wildlife Service, *Coastal Barrier Resources System, CBRS Mapper*, https://www.fws.gov/CBRA/Maps/Mapper.html, accessed December 27, 2021.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC	Yes ☐ No ☒	The Proposed Project would involve the construction of affordable housing for seniors. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) for the Project area, the Project Site is not within a Special Flood Hazard Area as designated by FEMA. Therefore, per HUD guidance, because the Project is not located within a Special Flood Hazard Area, there are no formal compliance steps or mitigation required and no further analysis is necessary. **References:**

4001-4128 and 42 USC 5154a]		Federal Emergency Management Agency, Flood Insurance Rate Map 06037C1375F.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes ☐ No ☒	Federally funded projects must conform to Clean Air Act requirements if they may constitute a significant new source of air pollution. If a project does not involve new construction, or conversion of land use facilitating the development of public, commercial, or industrial facilities, or five or more dwelling units, it can be assumed that emissions are below the US Environmental Protection Agency's (EPA) de minimis threshold levels. The analysis in the following paragraphs summarizes the Air Quality Technical Memorandum prepared for the Proposed Project in March 2022.[2] 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 the record 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 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 Site is located in the South Coast Air Basin (the 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. Pursuant to the national ambient air quality standards (NAAQS), the Basin is designated an extreme nonattainment area for O_3 and moderate nonattainment area for $PM_{2.5}$. 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. 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

[2] Michael Baker International, Ramona Senior Housing Project – Air Quality Technical Memorandum, March 18, 2022.

Quality Technical Memorandum prepared for this Project is based on the 2016 AQMP and the 2016-2040 RTP/SCS.

Per guidelines set forth by HUD, because the Project Site is in a nonattainment area for O_3 and $PM_{2.5}$, conformity with the State Implementation Plan (SIP) can be demonstrated in the record for compliance with HUD's implementing regulations under the Clean Air Act. A project is shown to conform with the SIP if its criteria pollutant emissions remain below the local air district's significance thresholds and it is consistent with the local AQMP.

Construction and Operation Emissions

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 1** and **Table 2,** 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_X, CO, SO_X, PM_{10}, and $PM_{2.5}$, which are shown in **Table 1**, below.

Table 1
Project Construction Emissions

Emissions Source	Pollutant (pounds/day)[1]					
	ROG[2]	NO_X	CO	SO_x	PM_{10}	$PM_{2.5}$
Year 1						
Construction Related Emissions[3]	3.87	47.97	38.40	0.15	5.06	2.31
Year 2						
Construction Related Emissions[3]	25.69	15.27	19.85	0.04	2.15	1.03
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Is Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

ROG = reactive organic gases; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter up to 10 microns; $PM_{2.5}$ = particulate matter up to 2.5 microns.
Notes:

1. Emissions were calculated using CalEEMod, version 2020.4.0.
2. In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are O_3 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.
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.

Source: Refer to Appendix A, *Air Quality Emissions Data*, of the Air Quality Technical Memorandum prepared for this Project for detailed model input/output data.

As indicated in **Table 1**, above, criteria pollutant emissions during construction of the Proposed Project would not exceed the SCAQMD significance thresholds.

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 2**, below.

Table 2
Long-Term Operational Air Emissions

Emissions Source	Pollutant (lbs/day)[1]					
	ROG	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Proposed Project Winter Emissions[2]						
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[3]	1.07	1.17	10.77	0.02	2.68	0.73
Total Emissions[4]	**32.53**	**3.90**	**77.10**	**0.17**	**11.32**	**9.36**
Proposed Project Summer Emissions[2]						
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[3]	1.09	1.08	11.00	0.02	2.68	0.73
Total Emissions[4]	**32.55**	**3.81**	**77.32**	**0.17**	**11.32**	**9.36**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Is Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes:
1. Emissions were calculated using CalEEMod, version 2020.4.0. Totals represented in table may be slightly off due to rounding.
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.

Source: Refer to Appendix A, *Air Quality Emissions Data*, of the Air Quality Technical Memorandum prepared for this Project for detailed model input/output data.

As indicated in **Table 2**, 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 3**, below, displays the LST of construction emissions for the Proposed Project, as well as the SCAQMD LST screening thresholds for determining significance.

Table 3
Localized Significance of Construction Emissions

Maximum Emissions	**Pollutant (pounds/day)**			
	NO_X	**CO**	**PM_{10}**	**$PM_{2.5}$**
Year 1	20.03	17.17	0.95	0.71
Year 2	12.98	14.02	0.61	0.56
Maximum Daily Emissions	**20.03**	**17.17**	**0.95**	**0.71**
LST Mass Rate Screening Criteria[2]	69	535	4	3
Screening Thresholds Exceeded?	***No***	***No***	***No***	***No***

Note:
1. The LST Mass Rate Screening Criteria were determined using Appendix C of the SCAQMD *Final Localized Significant Threshold Methodology* guidance document for pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$. 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 3**, emissions would not exceed the LST screening thresholds for source receptor area 8 (SRA 8), which includes the Project Site. 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 Central District Specific Plan (CDSP), SCAG's regional growth forecast, and the SCAG RTP/SCS. The RTP/SCS also provides socioeconomic forecast projections of regional population growth. As further discussed in the Conformance with Plans section of this EA, 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.

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 parking 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.

Conclusion

		In the past, the EPA has also required that an action's annual emissions are evaluated against 10 percent of the region's nonattainment or maintenance pollutants to determine if the action's emissions are regionally significant. On March 24, 2010, the EPA removed this requirement from their General Conformity Rule.[3] Since the project-generated construction and operational emissions would not exceed the SCAQMD thresholds of significance, the de minimis levels established within 40 CFR Section 93.153 would also not be exceeded. Therefore, the proposed project conforms with the SIP. Therefore, no adverse effect would result from the Proposed Project, the Proposed Project would be consistent with HUD's guidance on air quality, and no formal compliance steps or mitigation are required. **References:** Michael Baker International, Ramona Senior Housing Project – Air Quality Technical Memorandum, April 6, 2022. Michael Baker International, Addendum to Air Quality and Noise Analyses, September 9, 2022.
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes ☐ No ☒	The Coastal Zone Management Program (CZMP) is authorized by the Coastal Zone Management Act (CZMA). Projects that can affect a coastal zone must be carried out in a manner consistent with the state CZMP under Section 307(c) and (d) of the CZMA. The Project does not require state review under the CZMA as the City of Pasadena is not within the California Coastal Commission's jurisdiction. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary. **References:** California Coastal Commission, *Maps: Coastal Zone Boundary*, https://www.coastal.ca.gov/maps/czb/, accessed October 11, 2021.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes ☐ No ☒	HUD policies state that all property proposed for use in HUD programs shall be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended use of the property. Further, an environmental review of residential properties shall include an evaluation of previous uses of the site and other evidence of contamination on or near the site, to ensure that future residents of proposed site are not adversely affected by the hazards. HUD guidance states that particular attention should be given to any proposed site on or in the general vicinity of dumps,

[3] US Environmental Protection Agency, *Revisions to the General Conformity Regulations*, March 24, 2010, https://www.epa.gov/sites/production/files/2016-03/documents/20100324rule.pdf, accessed March 8, 2022.

		landfills, industrial sites, or other locations that contain, or may have contained, hazardous materials/wastes. 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. 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 Environmental Site Assessment (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 recognized environmental conditions (RECs), historic 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.[4] An HREC is defined as the past release of any hazardous substances or petroleum products 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. The Phase I ESA states that currently, portions of the Project Site are used for 1) storage of landscaping equipment and field office (i.e. small concrete block building and adjoining area), 2) the storage of vehicles (dirt lot), and 3) as landscaped areas (small park and parkways). The single building on the Project Site is rectangular, approximately 500 square feet in area, single-story, and constructed of concrete block. There are no paved roadways on the Project Site, only dirt pathways on the vacant portion of the Site used for vehicle parking. Several concrete pathways/sidewalks are located on 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,

[4] ASTM E1527-13

		with the residential uses remaining in place. From the 1920s to the 1940s, the eastern and southern portions of the Project Site were a park use (as is the case today). The small gymnasium in the center of the Project Site was removed and was 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 in the Statewide Environmental Evaluation and Planning System (SWEEPS) underground storage tank (UST) database.[5] 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

[5] 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.

		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, based on the findings of the Phase I and Phase II ESAs prepared for the Project, and the lack of the Project Site's inclusion on lists of hazardous waste sites managed by the State of California, there are no formal compliance steps or mitigation required and no further analysis is necessary. **References:** California Environmental Protection Agency, Cortese List, Section 65962.5(a), December 27, 2021. Leighton and Associates, Inc., Phase I Environmental Site Assessment, 280 Ramona Street, Pasadena California, December 9, 2021. Leighton and Associates, Inc., Phase II Environmental Site Assessment, 280 Ramona Street, Pasadena California, February 4, 2022.
Endangered Species Endangered Species Act of 1973, particularly	Yes ☐ No ☒	According to HUD Guidance, an Environmental Assessment must "consider potential impacts of the HUD-assisted project to endangered and threatened species and critical habitats." Further, the review must "evaluate potential impacts not only to any listed but also to any proposed endangered or threatened species and critical habitats."

section 7; 50 CFR Part 402		HUD states that "A No Effect determination can be made if the Project has no potential to have any effect on any listed species or designated critical habitats." This finding is appropriate if the Project has no potential to affect any species or habitats or if there are no federally listed species or designated critical habitats in the action area. According to the USFWS'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.[6] 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 USFWS 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.[7] As stated in the Project Description of this Environmental Assessment, the Project Site has been disturbed with past uses and is currently characterized by a dirt/gravel parking area, a small masonry building used as a storage shelter for maintenance equipment, and landscaped park spaces. The Project Site (including the City right of way along Holly Street) includes 47 trees, all of which are on City-owned land. Of the 47 trees located on the Project Site, 11 are street trees located along the Project Site's southern boundary with Holly Street (9 Engelmann oak trees) and along the Project Site's 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, arbor vitae, and mock orange trees. Because the Project Site is currently owned by the City of Pasadena, all of these trees are considered City trees and subject to the provisions of the City Trees and Tree Protection Ordinance (Chapter 8.52 of the City's Municipal Code). 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. These trees proposed for removal may provide shelter for migratory birds that are protected under the Migratory Birds Treat Act. Discussion of the Proposed Project's potential impact on migratory birds and related habitat is provided in the Natural Features section, below.

[6] US Fish and Wildlife Service, *Information for Planning and Conservation (IPAC) Report*, generated October 11, 2021.

[7] 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.

		As Project-related demolition and construction activities would take place on a site that has been previously disturbed by past uses, and because the Project Site is located within a fully urbanized environment that is surrounded by disturbed areas (such as a sidewalk, institutional uses [i.e., public buildings], and a dense street network), implementation of the Proposed Project would not result in the loss of habitat utilized by the four endangered or threatened species identified above. Further, the monarch butterfly, a candidate species, is highly mobile and, if present during construction, would be able to leave the Project area during construction-related Project activities. As such, the Project would have no effect on endangered or threatened species or critical habitat. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary. **References:** US Fish and Wildlife Service, *Information for Planning and Conservation (IPAC) Report*, generated October 11, 2021.
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes ☐ No ☒	There are inherent potential dangers associated with locating HUD-assisted projects near hazardous facilities which store, handle, or process hazardous substances of a flammable or explosive nature. According to HUD Guidance, if a project includes development, construction, rehabilitation that will increase residential densities, or conversion, then the record must demonstrate that the project site is not located near hazardous facilities or must implement mitigation measures. The Project Site is currently vacant, apart from an existing single-story masonry structure used to store maintenance equipment. The Project Site is surrounded by affordable housing (the YMCA building that is currently offering homeless services) and institutional development. As such, there is little likelihood that these areas would include an aboveground storage tank with more than 100 gallons of liquid industrial fuels. Review of aerial imagery did not reveal any such aboveground storage tanks within close proximity of the Project Site. Further, the nearest area of the City zoned Industry/General is 2.6 miles northwest of the Project Site. The EPA identifies 12 locations within one-half mile that are in the Resource Conservation and Recovery Act (RCRA) system, which is an inventory of generators, transporters, treaters, storers, and disposers of hazardous materials and waste. These locations include uses common in urbanized areas, including state buildings, automotive repair shops, and commercial uses. Upon review of aerial photography of the facilities, aboveground storage tanks of more than 100-gallon capacity do not appear on these sites. Additionally, per the National Pipeline Mapping System maintained by the US Department of Transportation, the nearest gas

		transmission pipeline is located approximately 2,900 feet west of the Project Site, within the Long Beach Freeway (I-710) right-of-way. There are no hazardous liquid pipelines, liquid spill accidents, or gas release incidences within the Project vicinity. In short, the Project Site and the immediate surrounding area are free of hazardous materials, contamination, toxic chemicals, gases, and radioactive substances that could affect health or safety, or conflict with the intended use of the Project Site. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary. **References:** Google Earth, Map data 2021. City of Pasadena, Zoning Map, September 2019. US Department of Transportation, Pipeline and Hazardous Materials Safety Administration, National Pipeline Mapping System, map generated December 27, 2021. US Environmental Protection Agency, NEPA Assist Map of RCRA sites near Project Site, map generated December 27, 2021.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes ☐ No ☒	Federal projects are subject to Farmland Protection Policy Act requirements if they may irreversibly convert farmland to a nonagricultural use. The Project Site, and each of the Project Site's neighboring parcels, have been classified by the California Department of Conservation as Urban and Built-Up Land. Further, the Project would not result in physical impacts beyond the boundaries of the Project Site, and would not impact any prime farmland, unique farmland, or farmland of local importance. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary. **References:** California Department of Conservation, California Important Farmland Finder, map generated December 27, 2021. HUD, HUD Exchange: Farmland Protection, https://www.hudexchange.info/programs/environmental-review/farmlands-protection/, accessed December 27, 2021.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes ☐ No ☒	Per HUD guidance, the Project is not exempt from compliance with HUD Floodplain Management regulations in Part 55 (through 24 CFR 55.12[c]). As stated above, the Project Site is not located within a Special Flood Hazard Area. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary. **References:** Federal Emergency Management Agency, Flood Insurance Rate Map 06037C1375F.

Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes ☐ No ☒	The National Historic Preservation Act (NHPA) directs each federal agency, and those tribal, state, and local governments that assume federal agency responsibilities, to protect historic properties and to avoid, minimize, or mitigate possible harm that may result from agency actions. The review process, known as Section 106 review, is detailed in 36 CFR Part 800. As part of required compliance with Section 106 of the NHPA, Historic Resources Group prepared a Historic Resources Technical Report, which details whether the project could result in adverse effects to historic properties. The following analysis is based on the analysis provided in the above-mentioned memorandum and includes a summary of the correspondence with tribes and the California Office of Historic Preservation (OHP). *Background Research* The above described report defines an area surrounding the Project Site within which any potential direct or indirect impacts resulting from the Proposed Project could reasonably be expected to occur ("Affected Environment"). The Affected Environment is defined as all parcels immediately adjacent to or directly across from the Project Site. The report investigates the Project Site and Affected Environment to identify all historic resources as defined for purposes of the National Environmental Policy Act (NEPA) which could be subject to Project impacts. The investigation detailed in the report includes a review of previous evaluations for historic eligibility for listing in the National Register of Historic Places. Field inspections were conducted of the Project Site and Affected Environment to review and confirm previous findings, and to identify any previously unevaluated properties that may be potentially eligible for historic listing in the National Register. The Project Site and Affected Environment for the Project are situated within the Pasadena Civic Center Historic District, which is listed in the National Register and thus is a historic resource for purposes of NEPA. The Project Site itself is a non-contributor to the historic district. However, the Project Site contains multiple planning and landscape elements which are identified herein as character-defining features of the National Register-listed historic district, including the approximately 25-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 decorative tile drinking fountain at the northeast corner of Holly Street and Marengo Avenue. Of the nine properties that make up the Affected Environment for the Project, eight are contributors to the Pasadena Civic Center Historic District: the YMCA Building/Centennial Place (located immediately west of the Project Site), YWCA Building, First Baptist Church, Turner & Stevens Mortuary, American Legion Pasadena Post No. 13, Southern California Gas Co. Building (now George Ellery Hale

		Building/Pasadena Permit Center), County Courts Building, and Pasadena City Hall. The Affected Environment 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. The report analyzes the Proposed Project for potential impacts to the National Register-listed Pasadena Civic Center Historic District, including any contributing properties or other character-defining features that have the potential to be impacted by the Project. *Findings* Analysis of the potential impacts to historic resources as defined for purposes of NEPA finds that the Proposed Project would not result in an adverse change in the significance of any historic resources located on the Project Site or in the Affected Environment through demolition, destruction, relocation, or alteration. The Proposed Project would construct a new building in the Pasadena Civic Center Historic District; however, the Proposed Project would not result in an adverse change in the significance of the historic district. The Proposed Project would not demolish or relocate any buildings, structures, objects, or sites that are contributing properties or other character-defining features of the historic district. None of the elements that would be demolished by the Proposed Project are considered historic resources on their own, or character-defining features of the historic district. The Project would alter the 25-foot landscaped setback area west of Garfield Avenue and north of Holly Street. However, despite this alteration, this element would remain a character-defining feature of the historic district, and therefore the Project would not adversely affect the historic district. Furthermore, the proposed new building would be compatible in size, scale, massing, and architectural design with the contributing buildings of the historic district located in the Affected Environment, and specifically with the YMCA Building/Centennial Place and Pasadena City Hall. The proposed new building would also maintain the historic district's important spatial characteristics and reinforce its distinctive urban form. The proposed new construction has the potential to impact the adjacent YMCA Building/Centennial Place due to vibration or settlement associated with construction activities. For this reason, the Proposed Project includes a construction vibration management plan to prevent damage to adjacent structures. With the construction vibration management plan in place the Proposed Project would not generate vibrations that would adversely affect the adjacent YMCA Building/Centennial Place. As such, construction activities associated with the Project would not adversely affect the historic district. After implementation of the Proposed Project, the historic district would retain all of its contributing properties and other character-defining features, and thus would retain sufficient integrity to convey its historic significance. As such, the historic district would remain

		eligible for historic listing in the National Register and the Project would have no adverse effect on historic properties. *Native American Consultation* On March 2, 2022, the City of Pasadena sent letters describing the project and invitations to consult to federally recognized tribes identified in the HUD Tribal Directory Assessment Tool for Los Angeles County, which included the Soboba Band of Luiseño Indians and the Torres Martinez Desert Band of Cahuilla Indians. On March 2, 2022, Tribal Historic Preservation Officer Joseph Ontiveros of the Soboba Band of Luiseño Indians requested to defer project consultation to the San Gabriel Band of Mission Indians. The San Gabriel Band of Mission Indians was contacted on May 26, 2022. No response has been received from the San Gabriel Band of Mission Indians or the Torres Martinez Desert Band of Cahuilla Indians to date. *SHPO Consultation* The City sent a letter (June 14, 2022) to the California OHP, State Historic Preservation Officer (SHPO), that summarized the findings presented above. The letter concluded that based on the findings of the cultural resources study, the City has determined that a finding of "No Adverse Effect" on historic properties is appropriate for the undertaking. The SHPO responded via email (August 11, 2022, and September 30, 2022), stating that the California OHP does not object to the City's finding that no historic properties would be affected by the Project. The SHPO confirmed this opinion in a letter provided to the City of Pasadena (October 5, 2022). In the event that historic properties are discovered during implementation of the Project, the City is required to consult further with the OHP pursuant to the regulations listed at 36 CFR 800.13(b) (Post-review discoveries). *Summary* The Proposed Project (the undertaking) would not result in an adverse effect on historic resources. Therefore, the Project is in compliance with NHPA Section 106. There are no formal compliance steps required and no further mitigation is necessary. **References:** Historic Resources Group, NEPA Historic Resources Technical Report, May 16, 2022. Historic Resources Group, Memo to Michael Baker International, September 2022. Lauchner Pries, Shannon, Historian II, Local Government and Environmental Compliance Unit, California Office of Historic Preservation, email to James Wong, Senior Project Manager, City of Pasadena, August 11, 2022, and September 30, 2022.

		Julianne Polanco, State Historic Preservation Officer, California Office of Historic Preservation, letter to James Wong,, Senior Project Manager, City of Pasadena, October 5, 2022.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes ☐ No ☒	To demonstrate consistency with HUD guidance on noise abatement and control, HUD requires that for projects involving new construction or rehabilitation of an existing residential property, the Environmental Review Record contain one of the following: • Documentation the proposed action is not within 1,000 feet of a major roadway, 3,000 feet of a railroad, or 15 miles of a military or Federal Aviation Administration-regulated civil airfield; • If within those distances, documentation showing the noise level is acceptable (at or below 65 L_{dn} [day/night noise level]); • If within those distances, documentation showing that there is an effective noise barrier (i.e., that provides sufficient protection); or • Documentation showing the noise generated by the noise source(s) is normally unacceptable (66–75 L_{dn}) and identifying noise attenuation requirements that will bring the interior noise level to 45 L_{dn} and/or exterior noise level to 65 L_{dn}. The Project Site is located within a fully urbanized area, characterized by dense urban development, mass transit, and vehicle traffic. The primary sources of noise in such urban areas include mechanical equipment, transportation, and parking areas. 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 also located approximately 800 feet east of the Los Angeles Metro L (Gold) light rail line, which is underground through the project area. Since the Project Site is within the distance screening criteria set by HUD for roadways, railroads, and airports, the record must, therefore, identify whether the Project Site's noise level is acceptable (at or below 65 L_{dn}) and if not, the record must state whether noise attenuation features would be included as part of the proposed rehabilitation activities. The proposed on-site residential units would be located along Ramona Street and Garfield Avenue. As such, the residential units facing these streets would be potentially exposed to the highest traffic noise levels. These residential units would be approximately 30 feet from the centerline of Ramona Street and 125 feet from the centerline of Garfield Avenue. FHWA RD-77-108 program was used to model traffic noise levels at the proposed on-site residential units under existing plus project conditions and the modeled results are shown in **Table 4.**

As shown in **Table 4**, below, noise levels at the proposed on-site residential units would not exceed HUD's exterior noise requirement of 65 dBA L_{dn}. According to the EPA's *Protective Noise Levels*,[8] typical buildings in a warm climate could provide a 24 dBA exterior to interior noise reduction with windows closed. Therefore, interior noise levels at the proposed on-site residences would not exceed HUD's interior noise requirement of 45 dBA L_{dn}.

Table 4

Noise Levels at Proposed On-Site Residences

Roadway Segment	Existing Plus Project ADT	L_{dn} at 100 Feet from Centerline of Roadway (dBA)[1]	Exterior L_{dn} at Proposed On-Site Residences (dBA)[1]	Interior L_{dn} at Proposed On-Site Residences (dBA)[1, 2]
Ramona Street East of Marengo Avenue	2,442	49.8	57.8	33.8
Garfield Avenue Between Ramona Street to Holly Street	2,067	49.1	47.6	23.6

ADT = average daily trips; L_{dn} = day-night sound level

Notes:

1. Traffic noise levels were calculated using the FHWA roadway noise prediction model. Refer to Appendix A, *Noise Model Results* for noise modeling assumptions and results.
2. According to the EPA *Protective Noise Levels*, typical buildings in warm climate could provide 24 dBA exterior to interior noise reduction with windows closed.

Therefore, since the Project Site is within HUD's Acceptable Noise Zone (not exceeding 65 dB), there are no formal compliance steps or mitigation required and no further analysis is necessary.

References:

Michael Baker International, Ramona Senior Housing Project – Noise Technical Memorandum, April 6, 2022.

Michael Baker International, Addendum to Air Quality and Noise Analyses, September 9, 2022.

[8] U.S. Environmental Protection Agency, *Protective Noise Levels*, November 1978.

Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes ☐ No ☒	The Project would involve construction of 106 affordable housing units in the City of Pasadena. . The Proposed Project is not located within a sole source aquifer area, as shown on the EPA's online mapping portal (the nearest sole source aquifer is approximately 115 miles southeast of the Project Site). Project-related improvements to the Project Site would not result in impacts to this sole source aquifer given the distance between the aquifer and the Project Site. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary. **References:** US Environmental Protection Agency, Map of Sole Source Aquifers in California, generated December 27, 2021.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes ☐ No ☒	The Proposed Project would consist of new construction, as defined in Executive Order 11990 ("draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of this Order [May 1977]"). As determined using the USFWS's National Wetlands Inventory, there are no known wetlands within or adjacent to the Project Site. The Project Site is a previously disturbed, effectively flat urban lot located in an urbanized environment. There are no drainages or hydrologic features on the Project Site, nor are there depressions or topographical features indicative of potential wetland areas. The National Wetlands Inventory identifies the Arroyo Seco, approximately 1.2 miles west of the Project Site, as the closest wetland (riverine) feature. This riverine feature has freshwater forested/shrub wetland features near the Colorado Street bridge, which is the nearest point to the Project Site. Given the distance between the Project Site and these features, construction activities associated with the Proposed Project would not result in sedimentation or other impacts that would negatively impact wetland habitats. Grading and construction activities associated with the Proposed Project would be required to comply with stormwater runoff and sedimentation prevention requirements. These requirements are discussed further in the Land Development section, below. Because grading- and construction-related sediment would be regulated by state and local water quality protections, and because the nearest surface water feature is approximately 1.2 miles away from the Project Site, no wetlands would be impacted in terms of Executive Order 11990's definition of new construction. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.

		References: HUD, Wetlands Protection, https://www.hudexchange.info/programs/environmental-review/wetlands-protection/, accessed December 27, 2021. US Fish and Wildlife Service, National Wetlands Inventory. Wetlands near Project Site, generated December 27, 2021.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes ☐ No ☒	The Project Site is not within proximity of a Wild and Scenic River as identified on the Nationwide Rivers Inventory, operated by the National Park Service. The inventory lists two rivers in Los Angeles County (the Big Sycamore River and Piru Creek), neither of which are near the City of Pasadena. Therefore, the Project is in compliance with this section. **References:** HUD, Wild and Scenic Rivers, https://www.hudexchange.info/programs/environmental-review/wild-and-scenic-rivers/, accessed December 27, 2021. US Fish and Wildlife Service, National Wild and Scenic Rivers System, Map of California, https://www.rivers.gov/river-app/index.html?state=CA, December 27, 2021. US National Park Service, List of California Scenic Rivers, 2016.
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes ☐ No ☒	The Proposed Project is intended to provide affordable housing opportunities for low-income individuals in the City of Pasadena. The Project Site is located in an area characterized by residential, institutional, civic, and commercial land uses, and the proposed units would result in beneficial long-term social and economic impacts for low-income and homeless individuals. As discussed in the Clean Air section, above, residents on and adjacent to the Project Site would not be exposed to substantial emissions of criteria pollutants. As discussed under Noise Abatement and Control, noise levels on the Project Site would be within HUD's acceptable conditions. Further, as discussed under Contamination and Toxic Substances, the Project would not expose future residents and the surrounding community to hazardous materials. The Project would not expose residents to adverse environmental hazards from aboveground storage tanks. Because the Proposed Project would not result in substantial adverse environmental effects, it would not have the potential to result in disproportionately high adverse effects on minority or low-income populations. As such, the Proposed Project would not result in any environmental justice concerns.

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and

described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

(1) Minor beneficial impact
(2) No impact anticipated
(3) Minor adverse impact – May require mitigation
(4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	(2) No impact anticipated	**Conformance with Plans** 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 floor area ratio (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."[9] 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 sub-district 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

[9] 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.

		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 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.[10] 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 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.[11] 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

[10] City of Pasadena Central District Specific Plan, Section 4, Maps 10 and 11

[11] 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.

		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 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. Compliance with the City's design review procedures, as well as the design features described above, would ensure that the proposed building would avoid what HUD refers to as "closed, windowless or undifferentiated" buildings at the sidewalk levels which may "seriously mar the public perception of safety and livability of the surrounding area." **References**

		City of Pasadena, General Plan Land Use Element, Adopted by City Council August 18, 2015. City of Pasadena, Central District Specific Plan, November 8, 2004.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	(2) No impact anticipated	**Soil Suitability** According to HUD Guidance, soil suitability is the physical capacity of a soil to support a particular land use. To be suitable for a building, for example, the soil must be capable of adequately supporting its foundation without settling or cracking. Soil depth is an important factor and must be adequate for the excavation of subterranean levels, sewers, and underground utility trenches. Surface soils need to be capable of supporting plantings. How well a soil is able to support development is a function of several factors including its composition, texture, density, moisture content, depth, drainage, and slope. Surface and bedrock geological conditions also affect site suitability for development. According to the geotechnical report prepared for the Project, shallow soils beneath the Project Site (within the top 10 feet) consist primarily of silty sand, with some gravel. Groundwater is located more than 100 feet below the Project Site (according to information collected from a well located 3,400 feet north of the Project Site). Soil borings drilled to a depth of 66.5 feet at the Project Site (soil borings were conducted in April 2021) did not encounter groundwater. The soil encountered by the soil borings primarily consisted of fill material (from previous grading activities on the site), with natural alluvial soils (i.e., silty sand, sand, and silt) beneath the fill soils. The Project Site is relatively flat and is currently characterized by an existing small single-story storage building, a gravel/dirt parking lot, and decorative landscaping. As such, the Project Site would not require extensive grading or landform transformation to accommodate the Proposed Project, and the Project Site would not significantly affect or be affected by slope conditions. Title 24, Parts 1 through 12 of the California Code of Regulations, which includes the 2019 California Building Standards Code (CBSC), was adopted by reference into the City's Municipal Code, as described in Section 14.04.010. Specifically, the 2019 CBSC requires that geotechnical investigations include recommendations for foundation type and design criteria, including, but not limited to, bearing capacity of natural or compacted soil; provisions to mitigate the effects of expansive soils; mitigation of the effects of liquefaction, differential settlement, and varying soil strength; and the effects of adjacent loads. In addition, the CBSC includes common engineering practices requiring special design and construction methods that reduce or eliminate potential soil-related impacts, including drainage-related requirements to control surface drainage and reduce seasonal fluctuations in soil moisture content. Additionally, the geotechnical report prepared for the Project includes site grading and design recommendations and best practices, which are designed to limit issues associated with soil subsidence, drainage, and

		stability, such as grading techniques, stormwater management practices, and recommendations for use of engineered fill. Therefore, compliance with CBSC regulations and recommendations in the geotechnical report prepared for the Project would result in adequate design and construction of building foundations to resist soil movement and/or other instability, and no adverse effects associated with soil suitability would occur. **Slope** The Project Site does not contain any naturally occurring landforms or steep slopes. The Project would not involve alteration of hillsides or steep vegetated slopes and would, therefore, not substantially change the visual character of the site or alter any native plant communities. No further compliance steps are required. **Erosion, Drainage, and Stormwater Runoff** Erosion, transport, and sedimentation are the processes by which the land surface is worn away (by the action of wind and water), moved, and deposited in another location. While commonly considered an agricultural problem, erosion in the urban context resulting from land clearance and construction can be equally serious. In urbanized areas, erosion can cause structural damage in buildings by undermining foundation support. It can pollute surface waters with sediment and increase the possibility of flooding by filling river or stream channels and urban storm drains. The Project Site has been disturbed by past development and there is no visible evidence of substantial soil erosion or sedimentation. However, during demolition, site preparation, and construction, uncovered soil could lead to wind-driven dust or stormwater erosion of topsoil on the Project Site. These issues would be addressed by required City evaluation of the Project's erosion control measures in compliance with the City's Municipal Code, SCAQMD Rule 403, and the General Construction Stormwater Permit. For example, construction activities associated with the Proposed Project would be required to comply with new construction requirements enforced by the City of Pasadena (such as completion of an erosion and off-site sedimentation control design plan [required with any grading permit application] as discussed in Section 14.05.084 of the City's Municipal Code). Specifically, the Project would 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 demolition and construction are completed, the Project Site would be covered by impervious surfaces or by maintained landscaping, thus eliminating potential sources of substantial erosion. Stormwater would be conveyed to existing stormwater infrastructure in the Project vicinity, such as a storm drain located at the northeast corner of the Project Site, which connects to existing stormwater drains located within Garfield Avenue. Therefore, with compliance with local and state regulations relating to erosion and stormwater control, Project-related erosion, sedimentation, and stormwater impacts would be less than significant. **References:** Converse Consultants, 2021, Geotechnical Investigation Report, Ramona Senior Housing Project, 280 Ramona Street (APN 5723-018-910), Converse project no. 20-31-323-1, May 14, 2021.
Hazards and Nuisances including Site Safety and Noise	(2) No impact anticipated	**Hazards and Site Safety** The Project Site is located in an urbanized area and is not in the vicinity of most potential natural hazards, including hazardous terrain, volcanoes, steep slopes/landslide areas, and fire-prone areas. The Project Site does not include any known poisonous plants, animals, or insects, nor is it located in an area susceptible to wind or sandstorms. The Project Site is located within an area of minimal flood hazard, as discussed in the Floodplain Management section above. Under the Alquist-Priolo Earthquake Fault Zone Act, the California State Geologist identifies areas in the state that are at risk from surface fault rupture. The main purpose of the act is to prevent construction of buildings used for human occupancy where traces of active faults are evident on the earth's surface. Active faults are those that have moved at least once in the last 11,000 years and are considered capable of generating earthquakes in the future. These zones are known as Alquist-Priolo Earthquake Fault Zones. Impacts resulting from fault rupture generally occur within the immediate vicinity overlying the fault. The zones vary in width, but average about one-quarter mile across. According to the Safety Element of the City's General Plan, the San Andreas fault is located approximately 21 miles north of Pasadena and has the highest probability of causing an earthquake. In the immediate area, faults include the Sierra Madre fault, which extends across the City's northern boundary; the Raymond fault, which extends into the City's southern and eastern boundaries; and the Eagle Rock fault, which extends across the southwestern portion of the City. As stated in the geotechnical report prepared for the Project, the Project Site is not located within a currently designated State of California Earthquake Fault Zone for surface fault rupture and no surface faults are known to project through or towards the Project Site. Further, the Project Site is not located within a mapped

Seismic Hazard Zone for liquefaction. The penetration tests conducted as part of the geotechnical study prepared for the Project concluded that soil deposits beneath the Project Site are generally dense and stiff and, as a result, the potential for liquefaction at the site is considered very low. Therefore, the Project Site is not located within a delineated earthquake fault zone or seismic hazard zone.

As discussed under the Soil Suitability and Slope section above, the Project would be required to be designed in accordance with CBSC requirements. The CBSC addresses structural seismic safety and includes design criteria for seismic loading and other geologic hazards, including design criteria for geologically induced loading that governs sizing of structural members and provides calculation methods to assist in the design process. These seismic building criteria and standards are designed to reduce ground-shaking risks to acceptable levels by preparing structures to accommodate moderate earthquake-related ground movement. The CBSC includes provisions for buildings to structurally survive an earthquake without collapsing and includes measures such as anchoring to the foundation and structural frame design.

Nuisances

The Project Site has been previously disturbed and is characterized by bare earth, gravel, managed landscaping, and an existing single-story storage building, which do not display any evidence of nuisances, such as by gas, smoke, or fumes; odors; vibration; glare from adjacent industrial or commercial uses; vacant buildings; unsightly land uses; front lawn parking; abandoned vehicles; or vermin infestation from the uses surrounding the Project Site.

Noise

The Project itself would not be a noise-generating facility, such as an industrial land use. Noise generated by operation of the Project would be typical of other multifamily residential land uses in the Project vicinity. There are no design characteristics of the Project that would generate substantial noise levels that would be out of character for the area, such as amplified noise or large trucks. The following paragraphs outline the noise impacts of Project construction and operation.

Construction

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. *Operation* 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 over 5 dBA are generally considered "readily perceptible."[12] 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

[12] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

		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 51dBA. 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. The above analysis is a summary of the Noise Technical Memorandum prepared for the Proposed Project. 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. Michael Baker prepared an Addendum to the Air Quality and Noise Analyses, 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 a proposed subterranean parking level). Given the reduction in units and the removal of the subterranean parking level, 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. 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 short, construction and operation of the Project would not generate noise levels that would exceed the City's noise standards at the closest sensitive receptors. **References:** California Department of Transportation (CalTrans), Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013. Converse Consultants, 2021, Geotechnical Investigation Report, Ramona Senior Housing Project, 280 Ramona Street (APN 5723-018-910), Converse project no. 20-31-323-1, May 14, 2021. Iteris, Inc., Transportation Impact Analysis – Outside CEQA Evaluation 280 Ramona Street, February 22, 2022, prepared on behalf of the City of Pasadena Michael Baker International, Ramona Senior Housing Project – Noise Technical Memorandum, March 18, 2022. Michael Baker International, Addendum to Air Quality and Noise Analyses, September 9, 2022.
Energy Consumption	(2) No impact anticipated	**Energy Consumption** Because the Project would result in the construction of 106 affordable residential units for seniors on a site that is predominantly undeveloped (apart from an existing storage building), the Project is expected to result in an increase in energy consumption as compared with existing conditions. However, the Project would be required to comply with the 2019 California Green Building Standards Code (CALGreen, Title 24, Part 11), as Section 14.04.010 of the Pasadena Municipal Code adopts the CALGreen building code by reference. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2019 Title 24 standards contain updated energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing building, and alterations to existing buildings. Energy efficiency improvements included as part of the 2019 Title 24 standards include required photovoltaic panels on low-rise residential buildings, as well as energy efficiency improvements for attics, walls, water heating, and lighting. Because of the mandatory energy efficiency design standards in the CALGreen building code, the Proposed Project's energy consumption would be lower on a per capita basis than the City's average household energy consumption. Additionally, the Project would include several energy-saving measures, such as an all-electric design (i.e., no natural gas hookups), a heat pump boiler system which is more efficient than a natural gas boiler, high efficiency HVAC systems, LED lighting throughout the Project, with smart controls throughout to conserve energy, and preparing for future energy efficiency measures, such as installing conduits and maintaining space for a future battery storage system in the basement level.

		The Project Site is located in a fully urbanized area with a variety of commercial uses and services within walking distance. Such amenities include many restaurant and retail uses located on East Colorado Street within one-quarter mile south and west of the Project Site. Additional restaurant and retail uses, as well as institutional resources, such as City Hall, a post office, and the USC Pacific Asian Museum, are located south and east of the Project Site. Additionally, the Project Site is located approximately 800 feet east of the Los Angeles Metro L (Gold) Line Memorial Park Station, which is at the intersection of Holly Street and North Arroyo Parkway. Finally, the Project would not provide on-site parking. As such, the Project would have fewer greenhouse gas emissions as compared with a 106-unit residential project with parking provided for each unit. The location of the Project Site would promote walking and transit usage, thus resulting in less energy consumption than a similar development in an auto-dependent, rural area. Therefore, compliance with required local and state energy efficiency and design review requirements, as well as the close proximity of the Project Site to amenities, services, and transit service, would ensure that the Proposed Project would not result in a significant source of energy consumption. **Energy Utilities** Electricity service is provided to the Project Site by Pasadena Water and Power (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.[13] 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 contacts" (PWP 2018, p. 69). 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, given that the Project Site is already served by electrical utilities, and given that electrical conduits exist within

[13] Pasadena Water and Power, 2020 Power Content Label, August 2021.

Ramona Street, Garfield Avenue, and Holly Street, 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 the 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 activities in the proposed structure would rely on electricity. As such, the Project would not result in an increase in natural gas usage on the Project Site.

Climate Change

Per Executive Order 14008, and HUD's guidance to demonstrate that projects are resilient to climate change, the following analysis demonstrates Project consistency with the Pasadena Climate Action Plan (CAP).

The Pasadena 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, and demonstrate Pasadena's commitment to achieving the statewide emissions reduction targets.

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 Plans 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 5**.

Table 5
Pasadena CAP Mandatory Actions

GHG Reduction Strategy	Sustainable Development Actions
T-1.2: Continue to improve bicycle and pedestrian safety	**Bicycle Storage:** Does the project provide bicycle storage lockers, racks, or other bicycle storage facilities for residents/employees?
T-3.1: Decrease annual commuter miles traveled by single occupancy vehicles	**Transportation Demand Management (TDM):** 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.
T-4.1: Expand the availability and use of alternative fuel vehicles and fueling infrastructure	**Alternative Vehicle Fueling Wiring:** For projects with more than three parking spaces, does the project provide wiring for at least one 240V Type II electric car charger?
E-1.2: Encourage the use of energy conservation devices and passive design concepts that make use of the natural climate to increase energy efficiency	**Passive Design Features:** 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?
WC-1.1: Reduce potable water usage throughout	**Irrigation Efficiency:** Will the project utilize drought tolerant

Pasadena	landscaping and/or drip irrigation and/or weather controllers to reduce outdoor water use?
WR-1.1: Continue to reduce solid waste and landfill GHG emissions	**Facilitate Recycling:** 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 5**:

- **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 5**, 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 6: Pasadena CAP Selective Actions.**

Table 6
Pasadena CAP Selective Actions

GHG Reduction Strategy	Sustainable Development Actions
ENERGY EFFICIENCY AND CONSERVATION	
E-1.1: Increase energy efficiency requirements of new buildings to perform better than the 2016 Title 24 Standards	**Zero-Net Energy (ZNE):** Does the project generate 100% of electricity required on site?
	Energy Efficiency (Exceed 2016 Title 24): Does the project exceed the 2016 Title 24 Efficiency Standards by at least 5%?
E-4.1: Increase city-wide use of carbon neutral energy by encouraging and/or supporting carbon-neutral technologies	**Renewable Energy:** Does the project generate at least 60% of the building's projected electricity needs through renewable energy?
SUSTAINABLE MOBILITY AND LAND USE	
	End-of-Trip Bicycle Facilities (Commercial Development): Does the

T-1.1: Continue to expand Pasadena's bicycle and pedestrian network	project provide at least one shower for every 50 employees?
	Bike Share: Does the project include a bike share station?
T-3.1: Decrease annual commuter miles traveled by single occupancy vehicles.	**Car Sharing:** 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.
	Parking De-Coupling: Does the project separate the cost of parking from the cost of commercial space and/or residential housing by charging for each individually?
	Transportation Demand Management (TDM): 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.)
T-4.1: Expand the availability and use of alternative fuel vehicles and fueling infrastructure.	**Alternative Vehicle Fueling Infrastructure:** 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?
T-5.1: Facilitate high density, mixed-use, transit-oriented, and infill development.	**Transit Oriented Development:** Is the project located within 0.25 mile of a major transit stop as defined in the Zoning Code.
T-6.1: Reduce GHG emissions from heavy duty construction equipment and vehicles.	**Reduce GHG emissions from heavy-construction equipment:** Will the project utilize at least 30% alternative fueled construction equipment (by pieces of equipment) and implement an equipment idling limit of 3 minutes?
WATER CONSERVATION	
WC-1.1: Reduce potable water use throughout Pasadena.	**Indoor Water Efficiency:** Will the project achieve at least a 35% reduction in indoor water use per the LEED V4 Indoor Water Use Reduction Calculator?
WC-2.1: Increase access to and use of non-potable water.	**Rainwater Capture and Reuse:** Does the project utilize a rainwater capture and reuse system to reduce the amount of potable water consumed on site?
	Indoor & Outdoor Recycled Water: Will the project be plumbed to utilize recycled water for either indoor or outdoor water use?
	Greywater: 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?
WC-3.1: Improve storm water to slow, sink, and treat water run-off, recharge groundwater, and improve water quality.	**Permeable Surfaces:** Is at least 30% of the hardscape (e.g., surface parking lots, walkways, patios, etc.) permeable to allow infiltration?
	Stormwater Capture: 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?

WASTE REDUCTION	
WR-1.1: Continue to reduce solid waste and landfill GHG emissions.	**Recycled Materials:** 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.
WR-3.1: Implement a city-wide composting program to limit the amount of organic material entering landfills.	**On-Site Composting:** Does the project include an area specifically designated for on-site composting?
URBAN GREENING	
UG-1.1: 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.	**Greenspace:** 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.).
UG-2.1: Continue to protect existing trees and plant new ones to improve and ensure viability of Pasadena's urban forest	**Trees:** 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.

Further, FEMA's National Risk Index is an online tool used to illustrate the United States communities most at risk for 18 natural hazards, many of which can be exacerbated by climate change: avalanche, coastal flooding, severe cold, drought, earthquake, hail, heat wave, hurricane, ice storm, landslide, lightning, riverine flooding, strong wind, tornado, tsunami, volcanic activity, wildfire, and winter weather. Per the National Risk Index, the census tract including the Project Site (06037461902) has a "relatively high" summary risk index of 31.82/100, which is greater than the California average (22.57) and the national average (16.91). However, the majority of the risk is informed by a high risk score for earthquake hazards, with the remaining 17 natural hazards having very low risk scores (i.e., the Project Site is not at high risk for these hazards). Earthquake hazards are addressed in the Hazards and Site Safety section of this Environmental Assessment.

		References: City of Pasadena, Pasadena Climate Action Plan Appendix D, Climate Action Plan Consistency Checklist, adopted March 5, 2018. City of Pasadena, Water and Power Department, 2018 Power Integrated Resource Plan, December 2018. City of Pasadena, Water and Power Department, 2020 Power Content Label, August 2021. California Gas and Electric Utilities, 2018 California Gas Report, 2018. Federal Emergency Management Agency, National Risk Index Census tract 06037461902, May 18, 2022.

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	(2) No impact anticipated	The Proposed Project would involve construction of 106 affordable housing units, including one market-rate manager's unit. Other Project activities include construction of amenities and landscaping. A minor increase in construction-related employment opportunities would occur as a result of construction phases of the Project, which are anticipated to be filled by the existing regional workforce. However, the Project's influence on employment and income patterns is anticipated to be temporary and negligible.
Demographic Character Changes, Displacement	(2) No impact anticipated	**Demographic Character Changes** The Project would involve construction of 106 affordable housing units, including one manager's unit. The Project Site is currently vacant, apart from a storage structure on the north side of the Project Site. As such, no existing residential units would be removed as part of the Proposed Project and the Project would provide more housing opportunities for low-income senior households. There are no design features as part of the Proposed Project that would isolate a particular neighborhood or population, making access to local services, facilities, and institutions or other parts of the City more difficult. Rather, the Project would be located near community resources, such as recreation assets, government offices/buildings, commercial and retail uses, and transit opportunities, which reduce physical barriers and population isolation. Because of the diversity of land uses in the area, the Project would not create a significant concentration of low-income or disadvantaged people in violation of HUD site and neighborhood standards and HUD Environmental Justice policies. **Displacement** The Project Site is currently vacant, apart from an existing single-story masonry structure used to store maintenance equipment. As such, the Project would not result in the removal of any permanent housing units.

		Rather, the Project would construct 106 affordable units, including one two-bedroom manager's unit. Therefore, the Project would not result in displacement of any residents. No Project impacts are anticipated and no mitigation is necessary.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	(2) No impact anticipated	The Project would provide 106 units of affordable housing for seniors; therefore, there would be no school-aged children residing on the Project Site that would increase enrollment at area schools. As such, the Project would have no impact on educational facilities and classroom space. Further, the Project would provide on-site amenities for its residents, such as community rooms and outdoor spaces. Such assets would reduce the demand on cultural facilities and recreation spaces provided by the City in nearby areas. Therefore, no project impacts are anticipated and no mitigation is necessary.
Commercial Facilities	(2) No impact anticipated	A wide range of retail and commercial services with a variety of price ranges exists within a one-half-mile radius of the Project Site, including restaurants and retail uses in Old Pasadena, west of the Project Site, as well as retail and restaurant uses along East Colorado Boulevard south of the Project Site. The Project Site is also surrounded by a number of religious uses and is in close proximity to City services, with City Hall located immediately east of the Project Site, across Garfield Avenue. Additionally, a large retail department store (Target) is approximately one-half mile east of the Project Site, at the intersection of East Colorado Boulevard and Oak Knoll Avenue. Other uses commonly found in dense urban environments, such as banks, convenience stores, barber shops, nail salons, gyms, and entertainment venues (e.g., the Pasadena Playhouse at the intersection of El Molino Avenue and East Green Street), are located within one-half-mile of the Project Site. Further, the Project Site is situated approximately 800 feet east of the Los Angeles Metro L (Gold) Line Memorial Park Station, which is at the intersection of Holly Street and North Arroyo Parkway, and offers transportation to commercial facilities in other areas of the City and region. Therefore, existing commercial facilities serving the Project Site are adequate and accessible and no adverse Project-related impacts would occur.
Health Care and Social Services	(2) No impact anticipated	**Health Care** There are multiple medical facilities in the Project vicinity, which could be accessed by the Proposed Project's occupants. Specifically, Huntington Memorial Hospital, located approximately 1 mile southwest of the Project Site, is a full-service hospital including inpatient and

		outpatient services, as well as an emergency room. Project residents 60 and older and those with disabilities could reserve the City of Pasadena's Dial-a-Ride service, which would provide transportation to these facilities for 75 cents each way. Additionally, numerous health clinics are within 1 mile of the Project Site, including an urgent care clinic on East Colorado Boulevard, approximately 2,000 feet southeast. Further, Pasadena Fire Stations 31 and 33, which provide fire protection and emergency response services, are within 1 mile of the Project Site. Therefore, adequate health care services, including emergency medical services, are available to serve the Project and impacts would be less than significant. **Social Services** The Proposed Project would construct 106 units of affordable housing, including one two-bedroom manager's unit, thus increasing the demand for social services in the City of Pasadena. The Los Angeles County Department of Public Social Services provides state and federally mandated benefits and services to low-income residents of Pasadena and all of Los Angeles County. Funding received from state and federal sources is designated to support the implementation of a variety of programs, including CalWORKs, CalFresh, Medi-Cal, and GROW. In addition, the Pasadena Senior Center, located approximately 800 feet to the west at 85 East Holly Steet, provides a variety of social services, activities, classes, and other resources for seniors. Therefore, adequate social services would be available to residents of the Project Site. As such, there would not be a need to construct or expand existing social services networks or facilities to serve the Proposed Project. **References**: Los Angeles County, Department of Public Social Services, http://dpss.lacounty.gov/, accessed December 28, 2021.
Solid Waste Disposal / Recycling	(2) No impact anticipated	The City of Pasadena does not collect solid waste from commercial units or 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 only upon request or by 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 (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 offer recycling programs. Additionally, the City of Pasadena's 2014 Zero Waste Strategic Plan short- and long-term initiatives strive to reach the goal of reducing waste generation and increasing recycling and composting within the City. The Zero Waste Strategic Plan states that implementation of these initiatives 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). 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 **References**: CalRecycle, Solid Waste Information Systems Facility Detail: Scholl Canyon Landfill, https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3531?siteID=1000, accessed December 29, 2021. City of Los Angeles Sanitation, S.A.F.E. Collection Centers, undated.
Waste Water / Sanitary Sewers	(2) No impact anticipated	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.[14] 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. References: City of Pasadena, Sewer System Management Plan, November 2019. Los Angeles County Sanitation Districts, Whittier Narrows Water Reclamation Plan, https://www.app.lacsd.org/facilities/?tab=2&number=4, accessed December 29, 2021.
Water Supply	(2) No impact anticipated	Potable water services to the Proposed Project are provided by Pasadena PWP. Specifically, water mains providing potable water are located within Ramona Street and Garfield Avenue. Further, the weather station located on the east side of the Project Site is already served by an existing water line that connects to the water main located within Ramona Street. PWP's 2020 Urban Water Management Plan (UWMP) uses the Pasadena General Plan's planned growth and development in the City to anticipate future water consumption within the City. PWP's current water supplies include local groundwater from the Raymond Basin (approximately 40 percent) and purchases of imported water (approximately 60 percent). In wet and normal years, PWP augments local groundwater with surface water diversions. This provides storage benefits to PWP, with surface water that is diverted and infiltrated during wet years being stored in the basin for use in periods of higher demand. Water demands that are not met with local groundwater are fulfilled with imported water purchased by PWP from the Metropolitan Water District of Southern California (MWD). MWD is a regional water wholesaler with 26 public member agencies, including PWP. MWD obtains its water supplies from the California State Water Project (SWP) and Colorado River Aqueduct (CRA).

[14] 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).

In 2020, PWP supplied 29,290 acre-feet of water to serve its 38,421 customer accounts (approximately 170,400 people). Population growth in the Pasadena area is expected to be approximately 0.5 percent per year between 2020 and 2040. **Table 7**, below, outlines projected supply and demand totals during a multiple dry-year scenario.

Table 7

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

	2025	**2030**	**2035**	**2040**
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
Demand Total	26,750	25,000	25,320	25,630
Difference	**4,803**	**6,943**	**6,727**	**6,500**

Source: PWP, 2021.

Projected imported water supplies shown in **Table 7** 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 7** 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.[15] As such, since the Project would be consistent with its underlying zoning and General Plan designation, and since the UWMP demonstrates adequate 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. Therefore, based on water demand and supply projections included within the City's UWMP, and given that the Project would be able to connect to existing water mains located within Ramona Street and Garfield Avenue, the City (PWP) would have adequate water supplies to serve the Proposed Project. **References:** City of Pasadena Water and Power, 2020 Urban Water Management Plan, Final Report, June 2021.
Public Safety - Police, Fire and Emergency Medical	(2) No impact anticipated	**Police** The Proposed Project would be served by the City of Pasadena Police Department (PPD). 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 (CSAs). The Project Site is located within the West CSA. The nearest police station is located at the southwestern corner of the intersection of Walnut Street and Garfield Avenue, approximately 300 feet north of the Project Site. The PPD classifies priority calls for police services into three categories: Priority 1, immediate threat to human life (a target response time of six minutes or less); Priority 2, crime in progress and suspect on scene (a target response time of 11.5 minutes or less); and Priority 3, a priority call, but no suspect on scene (a target response time of 21.5 minutes).[16] 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 police protection services. 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. Specifically, development of residential dwelling units and/or nonresidential space over time would generate roughly proportional funding for police services through collection of tax revenues. 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. Further, the City's General Plan Land Use Element includes Policy 16.2, which

[15] City of Pasadena, Department of Water and Power, 2020 Urban Water Management Plan, June 2021.

[16] City of Pasadena, Pasadena General Plan EIR, Section 5, Public Services, January 2015.

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, given the Project's consistency with General Plan and zoning designations of the Project Site, the existing General Plan policy regarding the adequacy of public services would ensure that police resources would be adequate to serve the Project.

Fire

The Pasadena Fire Department (PFD) would provide fire protection and emergency medical services to the Project Site. 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, approximately 2,200 feet to the southwest. According to the City's 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.

PFD's response time standard for emergency calls is that a fire engine arrives at the scene of an emergency within 5 minutes of dispatch 90 percent of the time. According to the City's General Plan EIR, the response time for fire and emergency medical services incidents averages 5 minutes 52 seconds. Additionally, the PFD has automatic aid agreements (i.e., assistance dispatched automatically through contractual agreements between two communities or fire districts) with the Los Angeles City Fire Department (LAFD), Los Angeles County Fire Department (LACoFD), and Unified Response, which is an aid agreement with 10 surrounding cities: Burbank, Glendale, South Pasadena, San Marino, Sierra Madre, Arcadia, Monrovia, San Gabriel, Alhambra, and Monterey Park.

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.

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 services from PFD. Additionally, Project building plans would be reviewed by the PFD 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. **Emergency Medical Services** See the Health Care and Social Services discussion, above. **References:** California Department of Forestry and Fire Protection, Very High Fire Hazard Severity Zones in LRA, Pasadena, September 2011. City of Pasadena, Pasadena General Plan Environmental Impact Report, January 2015.
Parks, Open Space and Recreation	(2) No impact anticipated	The Project Site is located approximately 900 feet east of Memorial Park and approximately 2,000 feet northeast of Central Park. These two assets, each within one-half mile of the Project Site, provide outdoor recreation spaces, lawns and shade trees, play equipment, art installations, a bandshell (Memorial Park), a senior center (Memorial Park), a rose garden (Central Park), picnic tables, free access to Wi-Fi, and specialized outdoor event spaces (i.e., the lawn bowling and croquet field at Central Park). Because the Proposed Project would not result in substantial population growth, as discussed previously, and given the proximity of multiple recreation assets to the Project Site, the Project would not warrant construction of additional park space, nor would it result in substantial deterioration of any existing recreation facilities. Further, the Project would be consistent with the Pasadena General Plan and CDSP and, therefore, the level of growth associated with the Project would be consistent with the City's long-term growth planning. Additionally, the Project would provide on-site recreation assets, such as a community room and central courtyard, which would further offset the limited demand on area recreation assets that would be generated by the Project. Given the relatively small increase in population associated with the Project, the proposed on-site recreation assets, and the Project's close proximity to existing recreation assets, the Project would not result in adverse impacts to the existing municipal park system. References: City of Pasadena, Memorial Park, https://www.cityofpasadena.net/parks-and-rec/parks/memorial-park/, accessed December 30, 2021. City of Pasadena, Central Park, https://www.cityofpasadena.net/parks-and-rec/parks/central-park/, accessed December 30, 2021.
Transportation and Accessibility	(2) No impact anticipated	The Project would result in minor short-term and long-term impacts to transportation and accessibility. For short-term impacts, Project construction would consist of site preparation and construction of the Proposed Project. Project-related construction activities (and

construction-related traffic) would occur during daylight hours on an intermittent basis, depending on the scope and intensity of the work taking place. While construction-related traffic (i.e., trucks and worker vehicles) could temporarily affect traffic flow on the surrounding street network, the impacts would be temporary and would fluctuate in intensity throughout the construction day and vary throughout the overall construction program, with less traffic generated in phases following construction. Because the construction traffic impacts associated with the Proposed Project would be temporary and would largely occur during off-peak hours, they would not significantly affect the performance of the vehicular transportation network with respect to level of service standards or other metrics related to congestion and travel delay.

Project-related long-term traffic impacts include the impact of resident, visitor, and delivery/service vehicles. As of July 1, 2020, transportation impact assessments prepared in accordance with the California Environmental Quality Act are required to analyze transportation impacts using vehicle miles traveled (VMT) as the primary measure of transportation impact. VMT is generally defined as the amount and the distance of automobile travel associated with a project. The California Governor's Office of Planning and Research (OPR) published a Technical Advisory that includes recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. The OPR Technical Advisory suggests that lead agencies may screen out VMT impacts using project-specific characteristics, such as project location, transit availability, and provision of affordable housing. Specifically, the OPR Technical Advisory states that affordable housing development in infill locations generally improves jobs-housing match and, in turn, shortens commutes and reduces VMT. Further, the OPR Technical Advisory states that a project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less than significant impact on VMT. Specifically, the OPR guidance states that "evidence supports a presumption of less than significant impact for a 100 percent affordable residential development in infill locations." The Project would involve development of 100 percent affordable residential units (with the exception of one manager's unit). As such, the Project can be presumed to have a less than significant VMT impact per OPR guidance. Additionally, it is not likely that all residents would own a vehicle while living at the Project Site, given the Project would not provide on-site parking. Also, the Project's proximity to commercial uses and transit options would encourage walking and further reduce vehicle trips associated with the Project. Since the Proposed Project would include 100 percent affordable housing units, and because the Project Site is considered an infill location given the surrounding urban land uses, the Project can be presumed to have a less than significant traffic (VMT) impact.

Regardless, a Transportation Impact Analysis was prepared for the Proposed Project by Iteris, Inc on behalf of the City's Department of Transportation pursuant to the City of Pasadena's Transportation Impact

Analysis Guidelines. This analysis reviewed a previous version of the project, which included 111 residential units and a subterranean parking level, providing 44 parking spaces on-site. As such, also included within the Project Environmental Review Record 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).

Per the City's Transportation Impact Analysis Guidelines, projects are analyzed using the City's calibrated travel demand forecasting model (TDF), which 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 new trips generated by the Project are then assigned to the surrounding roadway system.

The City of Pasadena has five metrics to evaluate transportation impacts: 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. These metrics are further described in the Transportation Impact Analysis prepared for the Proposed Project.

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 thresholds of significance, as shown in **Table 8**, below.

Table 8

Transportation Performance Metrics Summary and Significance Determination

Transportation Performance Metrics	Significant Impact Threshold	Incremental Change (Existing + Project)	Significant Impact?
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

		Additionally, a level of service (LOS) analysis prepared by Iteris, Inc. on behalf of the City states that the Project Site is located within a Transit Oriented District, which has a different LOS threshold than other parts of the City. LOS is defined by a range of grades from A (best) to F (worst). At intersections, LOS "A" represents relatively free flow operating conditions with little or no delay. LOS "F" is characterized by extremely unstable flow conditions, severe congestion, and delays with traffic volumes at or near the intersection's design capacity. This typically results in long vehicular queues extending from all approaches of an intersection. Citywide, the City's threshold for intersection LOS under existing plus project conditions is LOS D; however, this threshold is LOS E within the City's Transit Oriented District. The LOS traffic analysis found that the Project would generate 20 net new a.m. peak hour trips, 26 net new p.m. peak hour trips, and 370 net new daily trips and that none of the 14 surrounding intersections analyzed by the LOS study are forecast to exceed the City's adopted LOS thresholds. Importantly, this LOS and trip generation analysis was prepared for the previous version of the Project, which included 111 residential units and 44 on-site parking spaces. As such, with the Project's reduction in residential units to 106 and the removal of on-site parking, trip generation would be less than the calculated trip generation discussed above. Therefore, the reduction in trip generation means that the 14 surrounding intersections analyzed by the LOS study would still be below the City's adopted LOS thresholds following Project implementation. Regarding public transportation, the Project Site's 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 that is adjacent to the Project Site. Therefore, the Project would not result in a significant impact to transportation and mobility. **References**: City of Pasadena Department of Transportation, Transportation Analysis – CEQA memo, September 2, 2022. Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018. Iteris, Inc., Transportation Impact Analysis – CEQA Evaluation, prepared for City of Pasadena, February 18, 2022. Iteris, Inc., Transportation Impact Analysis – Outside CEQA Evaluation, prepared for City of Pasadena, February 22, 2022.
Environmental Assessment Factor	Impact Code	Impact Evaluation

NATURAL FEATURES		
Unique Natural Features, Water Resources	(2) No impact anticipated	The Project Site is a flat, 0.99-acre parcel located in a highly urbanized area. As stated above, the Project Site is characterized by an existing single-story storage structure, existing landscaping, and a gravel/dirt parking area. As such, nearly the entire Project Site has been disturbed by past development activity. There are no surface water features, sole source aquifers, or other water resources on or adjacent to the Project Site, as noted above in the Sole Source Aquifers, Wetlands Protection, and Wild and Scenic Rivers sections of this Environmental Assessment. Further, there are no unique geological features on or immediately adjacent to the Project Site that are of special social/cultural, economic, educational, aesthetic, or scientific value. Therefore, because Project-related construction activities would take place on a site that has been disturbed by past land management activities, and because the Project Site is located within a fully urbanized environment that is surrounded by disturbed areas (such as sidewalks, institutional buildings, commercial uses, streetlights, and major arterial streets), the Project would not impact any natural features, water resources, or geologic features. **References:** US Fish and Wildlife Service, National Wetlands Inventory, Wetlands near Project Site, generated December 27, 2021.
Vegetation, Wildlife	(2) No impact anticipated	Because the Project Site is located within a fully urbanized area, and because the Project Site has been disturbed by past uses, there are no existing remnant or endemic plant communities on the Project Site. As such, the Project would not damage or destroy such remnant or endemic plant communities, nor would it result in the substantial disruption of wildlife, habitat alteration or removal, effects to rare species (including those that are considered threatened or endangered, as described in the Endangered Species section of this Environmental Assessment), or the proliferation of pest species. There are 36 trees within the Project Site boundary, as well as 11 street trees located within the City's right-of-way within 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 City trees that are subject to the provisions of the City Trees and 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). The 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. These trees may provide nesting sites for migratory birds and raptors. Raptors (birds of prey), migratory birds, and other avian species are protected by state and federal laws, such as the federal Migratory Bird Treaty Act (MBTA) (42 USC Sections 703–712), which prohibits the killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior, as well as Section 3503.5 of the California Fish and Game Code, which states that it is "unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Given the potential for migratory birds to nest in the trees proposed for removal by the Project, impacts to nesting birds protected by the MBTA could occur if construction activities were to occur during nesting season (February 1 to September 15). While migratory bird species are considered highly mobile and would naturally avoid areas with loud construction noise, removal of potential nesting habitat would result in the potential for minor impacts. Therefore, **Mitigation Measure MM BIO-1**, described below, would protect nesting birds during Project-related demolition and construction activities, and would ensure that the Project would be consistent with the MBTA and CDFG Code. With implementation of **Mitigation Measure MM BIO-1**, there would be no adverse effect from the Project on vegetation and wildlife species. **Mitigation Measures:** **MM BIO-1: Migratory Bird Survey** Tree removal should not occur during the local nesting season (February 1 to September 15 for nesting birds and February 1 to June 30 for nesting raptors), to the extent practicable. If any tree removal occurs during the nesting season, a nesting bird survey shall be conducted by a qualified biologist prior to commencement of removal of any trees on the property. If the biologist determines that nesting birds are present, restrictions shall be placed on construction activities in the vicinity of the nest observed until the nest is no longer active, as determined by the biologist based on the location of the nest, type of the construction activities, the existing human activity in the vicinity of the nest, and the sensitivity of the nesting species. Tree removal may resume in this area when a qualified

		biologist has determined that the nest is no longer occupied, and all juveniles have fledged.
Other Factors		None Identified.

Additional Studies Performed:

Michael Baker International:

Michael Baker International, Addendum to Air Quality and Noise Analyses, September 9, 2022.

Michael Baker International, Ramona Senior Housing Project – Air Quality Technical Memorandum, April 6, 2022.

Michael Baker International, Ramona Senior Housing Project – Noise Technical Memorandum, April 6, 2022.

Additional Technical Studies:

City of Pasadena Department of Transportation, Transportation Analysis – CEQA memo, September 2, 2022.

Converse Consultants, 2021, Geotechnical Investigation Report, Ramona Senior Housing Project, 280 Ramona Street (APN 5723-018-910), Converse project no. 20-31-323-1, May 14, 2021.

Historic Resources Group, NEPA Historic Resources Technical Report, Ramona Senior Housing Project 275 E. Holly Street / 280 Ramona Street, Pasadena, May 16, 2022.

Historic Resources Group, Memo to Michael Baker International, September 2022.

Iteris, Inc., Transportation Impact Analysis – CEQA Evaluation, February 18, 2022, prepared on behalf of City of Pasadena.

Iteris, Inc., Transportation Impact Analysis – Outside CEQA Evaluation 280 Ramona Street, February 22, 2022, prepared on behalf of the City of Pasadena.

Leighton and Associates, Inc. Phase I Environmental Site Assessment, 280 Ramona Street, Pasadena California, December 9, 2021.

Leighton and Associates, Inc. Phase II Environmental Site Assessment, 280 Ramona Street, Pasadena California, February 4, 2022.

Field Inspection (Date and completed by)**:**

Field inspections performed as part of the above-mentioned studies are described within each study.

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]**:**

See list of references for each checklist section, above.

List of Permits Obtained:

Public Outreach [24 CFR 50.23 & 58.43]**:**

As part of the City of Pasadena's Design Review process, the City's Design Commission held public hearings on June 14, 2022, and September 27, 2022. Before finalizing the Project's Environmental Assessment, the City will publicly disseminate/publish the Environmental Assessment's findings, as required by 24 CFR 58.43 and 24 CFR 58.70. The City will consider the public comments received on any Project-related notices and, if appropriate, would make modifications in response to the comments.

Cumulative Impact Analysis [24 CFR 58.32]**:**

According to 24 CFR 58.32, a Responsible Agency must group together and evaluate as a single project all individual activities which are related either on a geographical or functional basis, or are logical parts of a composite of contemplated actions. 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 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.

Regarding potential transportation impacts, as discussed above, the OPR Technical Advisory states that "evidence supports a presumption of less than significant impact for a 100 percent affordable residential development in infill locations."[17] Since the Proposed Project would involve 100 percent affordable residential units and one manager's unit and because the Project Site is located within a dense, urban area within one-quarter mile of a light rail transit station (the Memorial Park Gold Line transit station), the Project can be presumed to have a less than significant traffic (VMT) impact and would not contribute to a cumulative transportation impact. Further, the transportation analysis conducted for the Project by Iteris, Inc., on behalf of the City of Pasadena, considered five measures of the Project's effect on the Citywide circulation system. By their nature, the City's 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 was not shown to result in transportation impacts greater than the City's significance thresholds.

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.[18] 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

[17] Governor's Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018.

[18] Historic Resources Group, Historical Resources Technical Report, April 18, 2022.

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 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. Furthermore, based on the analysis herein, the Project would not considerably contribute to any significant cumulative impacts resulting from successive or multiple projects that are related either on a geographical or functional basis, or are logical parts of a composite of contemplated actions.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

Alternate Project Design

This alternative would involve construction of a mixed-use multifamily residential and office space building on the same site as the Proposed Project. This mixed-use building would be designed to be consistent with the Bennett Plan for the Civic Center Area and would include a 45-foot setback along Garfield Avenue. The Project would include a monumental corner entrance that would be oriented toward Centennial Plaza and City of Pasadena City Hall. The Project would include an enclosed, landscaped interior courtyard that would be publicly accessible from the structure's main entrance. The proposed structure would be 60 feet in height (5 stories above grade) and would include one below-grade level of commercial office space and two subterranean levels of parking (providing 87 parking stalls, for a total of 46,000 square feet). The ground floor level through level five would provide 94 affordable multifamily units, including a mix of studios, two-bedroom, and three-bedroom units. This alternative project would include 46 studio units (330 square feet in size), 24 two-bedroom residential units (800 square feet in size), and 24 three-bedroom residential units (1,095 square feet in size), as well as 15,800 square feet of leasable office space (intended for a government tenant). The proposed FAR would be 1.95 with a total building area (above grade) of 85,115 square feet.

Commercial office space in particular is not needed or desired by the City, its intended user, and therefore the additional parking level to serve that commercial office space is unnecessary. Regarding the residential use, the City prefers to diversify and expand the residential population by building senior housing in an area that has primarily governmental, civic, institutional (e.g., churches), market-rate family, and single-room occupancy (SRO) housing uses. An affordable housing project serving seniors would put residents in close proximity to existing amenities and resources heavily utilized by seniors like the Pasadena Senior Center (located approximately 800 feet west of the Project Site) and Pasadena Public Library (located approximately 550 feet north of the Project Site). Finally, the cost and construction complexity of a mixed-use multifamily and office project is typically higher than a project with only residential uses, which would decrease the financial feasibility and constructability of the Project. For these reasons, a mixed-use

alternative project would not be as consistent with the applicable requirements of the Surplus Land Act, which is to prioritize and develop public agency (City-owned) properties primarily for the purposes of affordable housing. Therefore, the Proposed Project, as a solely residential land use, would be consistent with the City's requirements for use of public land and the Proposed Project is preferred over this alternative.

No Action Alternative [24 CFR 58.40(e)]:

Under this alternative, the Project would not occur and the Project Site would continue to operate as a primarily vacant lot that is occasionally used for surface parking. As discussed above, the Project would result in environmental impacts associated with air quality emissions, noise, and transportation impacts, when compared with the existing uses; however, under the No Action alternative, some environmental impacts, such as soil erosion and stormwater impacts from the existing bare soil characterizing the Project Site, would be improved through construction of the Project. This is due to the fact that the Project would include hardscapes and managed landscaping, thus reducing potential for wind-driven or water-related soil erosion from the central portion of the Project Site that is used for surface parking. Further, as discussed in the Statement of Purpose and Need for the Proposal Section, above, the City has documented a persistent demand for affordable housing, especially for seniors. Over time, it is possible that the Project Site would be sold to another developer and redeveloped with a use permitted within a CD-2 zone, such as multifamily housing, mixed-use commercial and residential projects, office uses, supportive housing, or SRO development, which could result in development impacts similar to or greater than those associated with the Proposed Project. Therefore, the Project is preferred over this alternative.

Summary of Findings and Conclusions:

After implementation of the mitigation measures included in this Environmental Assessment, as well as compliance with the federal, state, and local regulations discussed throughout this Environmental Assessment, the Project would not negatively impact the surrounding environment and would not have an adverse environmental or health effect on end users. The Project complies with NEPA and other related federal and state environmental laws.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
Vegetation, Wildlife	**MM BIO-1: Migratory Bird Survey** Tree removal should not occur during the local nesting season (February 1 to September 15 for nesting birds and February 1 to June 30 for nesting raptors), to the extent practicable. If any tree removal occurs during the nesting season, a nesting

	bird survey shall be conducted by a qualified biologist prior to commencement of removal of any trees on the property. If the biologist determines that nesting birds are present, restrictions shall be placed on construction activities in the vicinity of the nest observed until the nest is no longer active, as determined by the biologist based on the location of the nest, type of the construction activities, the existing human activity in the vicinity of the nest, and the sensitivity of the nesting species. Tree removal may resume in this area when a qualified biologist has determined that the nest is no longer occupied, and all juveniles have fledged.

Determination:

☒ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]

The project will not result in a significant impact on the quality of the human environment.

☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]

The project may significantly affect the quality of the human environment.

Preparer Signature: _____ Date: October 28, 2022

Name/Title/Organization: Brent Schleck/Senior Environmental Planner/Michael Baker Intl

Certifying Officer Signature: _____ Date: November 1, 2022

Name/Title: William Huang, Housing Director

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).