ATTACHMENT J

Amendment to the Fuller Seminary Master Plan

Addendum to the Pasadena General Plan Environmental Impact Report

Prepared for:



The City of Pasadena Planning & Community Development Department 175 N. Garfield Avenue Pasadena, CA 91101

Prepared by:



INTERNATIONAL 3760 Kilroy Airport Way, Suite 270 Long Beach, California 90806

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Acronyms and Abbreviations

CHAPTER 1 PURPOSE AND BACKGROUND

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

In 2015, the City updated the Pasadena General Plan and prepared the GP EIR to analyze potential citywide impacts, broad policy alternatives, and programmatic mitigation measures associated with the update of the Pasadena General Plan and specific plan amendments. The changes focused on the Land Use and Mobility Elements and the Land Use Diagram. The update also included the consolidation of optional elements into required elements of the General Plan. The Land Use and Mobility Elements, together with the other General Plan elements, guide the overall physical development of the City through horizon year 2035. The GP EIR is a Program EIR as defined by CEQA Guidelines Section 15161 and prepared in compliance with CEQA Guidelines Section 15168. The Final GP EIR was certified and the findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program (MMRP) adopted by the City Council on August 18, 2015 (Resolution No. 9451).

Following the adoption of the Pasadena General Plan and certification of the GP EIR, future discretionary actions include amendments and zone changes to provide consistency with the General Plan. In this regard, the City is considering an amendment to the Fuller Seminary Master Plan (Master Plan), as well as a Tentative Parcel Map and associated General Plan Land Use designation and Zoning Map amendments for the property located at 260 North Oakland Avenue. The proposed amendment would reduce the overall boundary of the Master Plan, subdivide an existing parcel at 261 North Madison Avenue into two parcels (261 North Madison Avenue and 260 North Oakland Avenue), extend the Master Plan expiration date to 2046, and cancel the Development Agreement.

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

1.1 Applicability and Use of an Addendum

Per the GP EIR, CEQA review required for the proposed project may tier from the GP EIR pursuant to CEQA Guidelines Section 15152. In addition, per CEQA Guidelines Section 15152(h), other methods to streamline the environmental review process also exist. These methods include

the use of a Program EIR (i.e., GP EIR) for later activities (CEQA Guidelines Section 15168) and preparing an addendum (CEQA Guidelines Section 15164). Lead agencies have discretion regarding which method may apply and should be used.

Under the process described in CEQA Guidelines Section 15168(c), later activities in the program must be examined in the light of the Program EIR to determine whether an additional environmental document must be prepared. No additional documentation is required for subsequent proposed actions (e.g., proposed amendments relating to land use matters) if the examination determines that the potential impacts were within the scope of the GP EIR, and subsequent proposed actions implement appropriate feasible mitigation measures identified in the MMRP that accompanies the Final EIR. Whether a later activity is within the scope of a Program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that a lead agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts and covered infrastructure as described in the Program EIR. If the agency finds that pursuant to CEQA Guidelines Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required.

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

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

on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Pursuant to CEQA Guidelines Section 15164, the City, as the lead agency, has prepared this Addendum to confirm that none of the conditions identified in CEQA Guidelines Section 15162 and Public Resources Code Section 21166(c) have been triggered. For a proposed modified project or related activity, CEQA Guidelines Section 15164 provides that an Addendum to a previously certified Final EIR may be prepared if some changes or additions are necessary but none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred. The City must consider the whole of the data presented in the GP EIR with the information provided in this Addendum and the previously adopted MMRP.

1.2 Format of This Addendum

The previously certified GP EIR serves as the primary environmental compliance document for the project, and this Addendum provides minor changes and additions to the GP EIR. This Addendum should be considered with the full text of the previously certified 2015 GP EIR. All applicable mitigation measures from the GP EIR would be applicable to the proposed project and, therefore, are incorporated by reference into this Addendum and included in Chapter 4. This Addendum relies on the use of an Environmental Checklist Form, as suggested in Section 15063(d)(3) of the CEQA Guidelines. Per the CEQA Guidelines, an addendum does not need to be circulated for public review but can be included in or attached to the Final EIR prior to making a decision on the project.

1.3 Summary of Findings

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

1.4 Lead Agency and Discretionary Approvals

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

Acknowledgement of this Addendum to the GP EIR and that no subsequent CEQA document is required;

- Amendment to the Fuller Seminary Master Plan to revise the boundary and extend the Master Plan for another 20 years
- Terminate the Master Plan Development Agreement for the Master Plan
- Lot split of the property located at 260 North Oakland Avenue from 261 N Madison
- General Plan Land Use Designation Amendment and Zone Change for 260 North Oakland Avenue from the Institutional General Plan Land Use designation and PS (Public-Semi Public) zone to the Medium Mixed-Use Residential General Plan Land Use designation and the Central District Residential Multi-Family (CD-RM-87) zone

CHAPTER 2 PROJECT DESCRIPTION

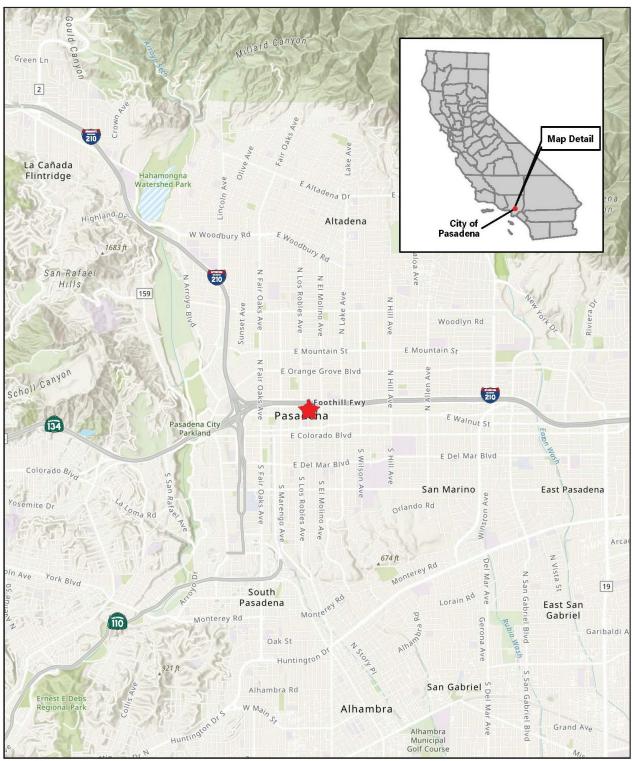
2.1 Introduction

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

The City is processing an amendment to the Master Plan to reduce the overall boundary of the Master Plan, extend the Master Plan expiration date to 2046, terminate the associated Development Agreement, split one parcel at 260 North Oakland Avenue, and change the General Plan Land Use Designation and Zoning designation for the parcel at 260 North Oakland Avenue from the Institutional General Plan Land Use designation and PS (Public, Semi-Public) zoning designation to the Medium Mixed-Use General Plan Land Use designation and Central District Residential Multi-Family (CD-RM-87) Zoning designation. The purpose of this Addendum to the GP EIR is to evaluate the environmental effects associated with the proposed Master Plan Amendment and to determine whether these impacts are consistent with the evaluation presented in the GP EIR in compliance with CEQA (Public Resources Code Sections 21000 et seq.) and the State CEQA Guidelines (Cal. Code of Regs. Section 15000 et seq.).

2.2 **Project Location**

The existing Master Plan boundary encompasses those parcels within the City generally bounded by Corson Street on the north, Madison Avenue and El Molino Avenue on the east, Union Street on the south, and Los Robles Avenue on the west. Figure 1 shows the regional location of the City. Figure 2 shows the existing Master Plan Boundary.



Source: ESRI Streetmap, 2024

Figure 1 – Regional Location Map



Source: Google Earth Pro, August 2024

Figure 2 – Existing Master Plan Boundary

2.3 Project Intent

The primary goals and objectives identified in the 2015 GP EIR include:

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

The overall purpose of the proposed project is to consolidate the Master Plan boundary to encompass the core properties under the ownership of the Fuller Seminary, subdivide the parcel at 260 North Oakland Avenue from 261 North Madison, and update the General Plan Land Use designation and zoning on the property located at 260 North Oakland Avenue to align with the existing and surrounding uses at that location. Parcels removed from the existing Master Plan boundary would no longer be subject to the standards and provisions of the Master Plan and any

future development on these parcels would remain subject to the General Plan Land Use and zoning designations and corresponding development standards.

2.4 Description of the Proposed Project

The City is processing an amendment to the Fuller Seminary Master Plan, as well as associated General Plan Land Use designation and zoning amendments for the property located at 260 North Oakland Avenue. Implementation of the proposed project would consist of the following four components:

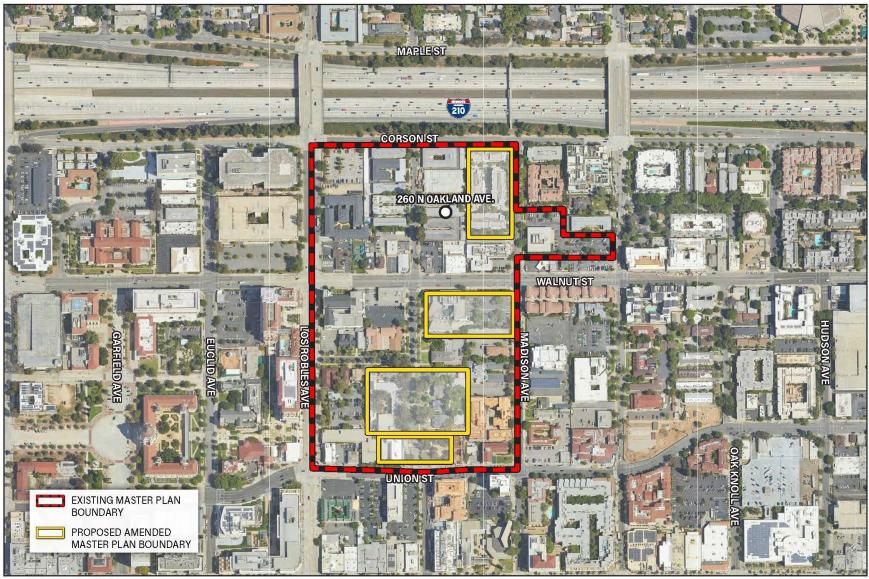
- 1. Master Plan Boundary Amendment: the Master Plan boundary would be reduced to only include those properties that are currently owned by Fuller Seminary and designated as core properties. Figure 3 shows the proposed Master Plan boundary amendment in the context of the existing Master Plan boundary.
- 2. Lot Split for 260 North Oakland Avenue: the existing parcel located at 260 North Oakland Avenue would be split from 261 North Madison Avenue to create its own distinct parcel.
- 3. General Plan Land Use Designation Amendment and Zone Change for 260 North Oakland Avenue: The property at 260 North Oakland Avenue is currently developed with a 10-unit multi-family residential building. This property is currently designated as Institutional in the General Plan and zoned PS for Public-Semi Public uses. The proposed project would include amending the General Plan Land Use designation to Medium Mixed-Use Residential and changing the zoning to Central District Residential Multi-Family (CD-RM-87) to align with the existing and surrounding uses at that parcel.
- 4. Terminate the Master Plan Development Agreement: the existing Master Plan Development Agreement applies only to those properties within the existing Master Plan Boundary that are under the ownership of the Fuller Seminary. With implementation of the proposed project, those parcels excluded from the updated Master Plan boundary would not be subject to a Master Plan Development Agreement regardless of property ownership.

It is important to note that no development is proposed or would occur as part of the project. Following approval of the proposed Master Plan Amendment and General Plan Land Use designation amendment and zone change at 260 North Oakland Avenue, all other excluded parcels would remain subject to the development standards of the General Plan Land Use designations and underlying zoning. The existing land uses of all excluded parcels, except for 260 North Oakland Avenue, are consistent with the underlying General Plan Land Use designation and zoning. With the proposed General Plan Land Use designation amendment and zone change for 260 North Oakland Avenue, the existing land use of this parcel would be consistent with the General Plan and zoning designations.

2.4.1 Relationship to 2015 General Plan

The 2015 Pasadena General Plan update to the General Plan Elements, included the Mobility Element and the Land Use Element, which guide the overall physical development of the City. As this document compares the environmental impacts of the proposed project to those analyzed in the GP EIR, it is important to note that the proposed Master Plan Amendment does not modify or change the intent of the adopted General Plan. Rather, the Master Plan Amendment has the

potential to assist in achieving the goals and vision of the General Plan by allowing for potential future buildout of the excluded parcels consistent with the General Plan Land Use designations and zoning. It is important to note that no development is currently proposed for parcels proposed for exclusion from the Master Plan nor parcels proposed to remain within the amended boundary, and no specific development concepts have been contemplated by or presented to the City.



Source: Google Earth Pro, August 2024

Figure 3 – Proposed Amended Master Plan Boundary

CHAPTER 3 EVALUATION OF ENVIRONMENTAL IMPACTS

The following evaluation assesses the environmental impacts of the proposed Master Plan Amendment in relation to the analysis provided in the 2015 GP EIR. Determinations are made as to whether the proposed project would result in new significant impacts or substantially more severe effects, which would trigger the need for a Subsequent or Supplemental EIR.

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

What is the impact conclusion of the Master Plan Amendment?

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

- No Impact (NI) A designation of no impact is given when no changes in the environment would occur.
- Less than Significant Impact (LTS) A less than significant impact would cause no substantial adverse change in the environment.
- Less than Significant Impact with Mitigation (LTS-M) A less than significant impact with mitigation incorporated avoids substantial adverse impacts on the environment with adherence to identified mitigation measures. For those issue areas where the impact of the proposed project would be less than significant with the incorporation of the same mitigation measure(s) identified in the GP EIR, the impact is identified as LTS-M(GP). The number of the mitigation measure from the GP EIR MMRP will be referenced and summarized in Chapter 4.
- **Significant and Unavoidable Impact (S-U)** A significant unavoidable impact would cause a substantial adverse effect on the environment, and no feasible mitigation measures would be available to reduce the impact to a less than significant level.

What is the GP EIR impact conclusion? The issues that were found to be either less than significant or were found to have no impact in the Initial Study (IS) prepared for the GP Update and were therefore excluded from further analysis in the GP EIR, are identified with "(IS)" after the impact conclusion.

Does the Master Plan Amendment involve new significant impacts or substantially more severe impacts than those analyzed in the GP EIR?

Are there any new or changed circumstances involving new significant impacts or substantially more severe impacts than those analyzed in the GP EIR?

Is there any new information of substantial importance that was not and could not have been known at the time of certification of the GP EIR that rises to the level of requiring new analysis or verification?

Are any new mitigation measures required for the Master Plan Amendment?

Is	sues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
l. Wa	AESTHETICS. build the project:						
a)	Have a substantial adverse effect on a scenic vista?	LTS	LTS	No	No	No	No
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	LTS (IS)	LTS	No	No	No	No
c)	Substantially degrade the existing visual character or quality of the site and its surroundings?	LTS	LTS	No	No	No	No
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	LTS	LTS	No	No	No	No

The GP EIR concluded that implementation of the approved General Plan Update would result in less than significant environmental impacts to aesthetics. While buildout of the General Plan would change the visual appearance of parcels in all areas of the City and its sphere of influence by allowing new development or redevelopment, the GP EIR stated that the City's Specific Plan Areas are most likely to experience changes in visual appearance and aesthetic character. The GP EIR found that development in accordance with the General Plan Land Use Element would not propose changes in the City's topography, tall buildings that would block views, or the redevelopment of entire neighborhoods. Additionally, the overall visual appearance and character of older, single-family residential neighborhoods is expected to remain intact, and no major obstructions of scenic views are anticipated. Scenic resources, including,

but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway were addressed in the IS prepared for the GP EIR, which found that impacts to this topic would be less than significant following the implementation of the General Plan Update. The GP EIR determined that although permitted development under the approved General Plan Update could result in increased light and glare, new development would be required to comply with the standards of the Pasadena Municipal Code (PMC), design guidelines, Land Use Element policies that require that lighting be shielded and efficient, and other regulations related to light and glare. Thus, the GP EIR found this issue to be less than significant. Overall, the GP EIR concluded that proposed land use changes in the General Plan Update would not adversely impact visual and scenic quality.

The proposed project does not include new development, and thus would not introduce any new structures that could obstruct scenic views. As discussed in Section 2.4, the proposed project would reduce the overall Master Plan boundary and allow for continued use of the existing land uses on the excluded parcels or potential future development on the excluded parcels consistent with the General Plan land Use diagram, underlying zoning, and existing and surrounding land uses. Any future development of the excluded parcels would be required to comply with the General Plan policies, the underlying zoning, and applicable design review processes for context-sensitive design to ensure less than significant impacts related to aesthetics. Furthermore, future development on parcels within the reduced Master Plan boundary would continue to be subject to the applicable Master Plan development standards, similar to existing conditions. Thus, no new or different environmental impacts would occur with implementation of the proposed project.

Regarding light and glare, implementation of the proposed project does not propose changes to existing structures or uses within the project site boundaries. Additionally, any future development on the parcels outside of the amended Master Plan boundary would be required to comply with standards outlined in the PMC, design guidelines, Land Use Element policies that require lighting to be shielded and efficient, and other regulations related to light and glare. Future development on parcels located within the amended Master Plan boundary would be subject to the applicable Master Plan development standards, similar to existing conditions. Therefore, similar to the GP EIR, the proposed amendments would result in less than significant impacts related to light and glare.

The IS indicated that the 210 freeway, which runs east-west just north of the existing and proposed amended Master Plan boundary, is a recommended LA County scenic highway; however, it is not officially designated. As previously discussed, no development would occur as part of the proposed project. The IS determined that removal of significant trees, rock outcroppings, or any historic buildings would be inconsistent with the General Plan Update. Additionally, as further discussed in Section V, Cultural Resources, significant impacts to historical resources would be avoided by adhering to existing regulations and policies. Therefore, impacts to scenic highways would be less than significant with implementation of the proposed project.

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

I	ssues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
II.	AGRICULTURAL RESOURC Would the project:	ES.					
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?	NI (IS)	NI	No	No	No	No
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	NI (IS)	NI	No	No	No	No
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned for Timberland Production (as defined by Government Code Section 51104[g])?	NI (IS)	NI	No	No	No	No
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	NI (IS)	NI	No	No	No	No

Issues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	NI (IS)	NI	No	No	No	No

Agriculture and forestry resources were addressed in the IS prepared for the GP EIR, which found that impacts to this topic would be less than significant following the implementation of the General Plan Update. The City has no farmland, land zoned for agricultural use, Williamson Act contracts, timberland or Timberland production, or forest land. The IS also stated that the Zoning Code permits commercial growing in General Commercial (CG), Limited Commercial (CL), and General Industrial (IG) zones and conditionally in the single-family residential (RS) and multi-family residential (RM) designated zoning districts and certain Specific Plan Areas; however, the General Plan Update did not alter uses permitted by the Zoning Code, and the objectives of the General Plan Update did not relate to or conflict with commercial growing.¹ Therefore, the General Plan Update did not result in any impacts to agriculture and forestry resources.

As no farmland, land zoned for agricultural use, land with Williamson Act contracts, timberland, or forest land exists within the City, implementation of the proposed project would not convert or conflict with the Zoning Code for land zoned for agricultural use, land with Williamson Act contracts, farmland, timberland, or forest land. Additionally, there are no CG, CL, IG, or RS zoned parcels within the project site boundaries, and the parcels zoned RM are not currently used for commercial growing. Should future development within the RM zoned parcels propose commercial growing, the proposed use would be subject to the existing conditional approval process and the specific use standards outlined in PMC Section 17.50.180, similar to existing conditions. Therefore, the proposed project would result in no impact to agricultural resources.

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

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

	Issues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
III.	AIR QUALITY. Where available, the significant upon to make the following dete				ality management or a	air pollution control district i	may be relied
a)	Conflict with or obstruct implementation of the applicable air quality plan?	S-U	Less than GP EIR Impacts	No	No	No	No
b)	Violate any air quality standard or contribute to an existing or projected air quality violation?	S-U	Less than GP EIR Impacts	No	No	No	No
c)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard?	S-U	Less than GP EIR Impacts	No	No	No	No
d)	Expose sensitive receptors to substantial pollutant concentrations?	LTS-M	LTS-M(GP)	No	No	No	No
e)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LTS-M	LTS-M(GP)	No	No	No	No

The GP EIR found that potentially significant impacts to air quality would occur if mitigation measures were not incorporated; in some instances, the GP EIR found impacts to air quality to be significant and unavoidable because no feasible mitigation measures would

be available to reduce impacts to a less than significant level. The City is entirely within the South Coast Air Basin (SoCAB) and therefore must comply with the rules and regulations imposed by the South Coast Air Quality Management District (SCAQMD). The SoCAB is also subject to the California Ambient Air Quality Standards adopted by the California Air Resources Board (CARB) and the National Ambient Air Quality Standards adopted by the federal government. The SoCAB is designated a nonattainment area (i.e., an area that does not meet the ambient air quality standards) for ozone (O3), fine inhalable particulate matter (PM2.5), and coarse inhalable particulate matter (PM10) under the California Ambient Air Quality Standards, and a nonattainment area for O3, PM2.5, and lead (Los Angeles County only) under the National Ambient Air Quality Standards. The GP EIR concluded that buildout of the General Plan Update would increase employment and population beyond current SCAG forecasts and contribute to cumulative SoCAB nonattainment designations. Thus, the GP EIR determined that impacts related to consistency with the SCAQMD's Air Quality Management Plan would be significant and unavoidable. Additionally, while certain aspects of the General Plan Update Land Use Plan would lead to improvements in transportation and thus decrease emissions from that source, the GP EIR found that even with implementation of GP EIR Mitigation Measure 2-1, requiring the preparation of a technical assessment evaluating potential project construction-related air quality impacts to the City Planning Division prior to issuance of construction permits, and GP EIR Mitigation Measure 2-2, requiring the preparation of a technical assessment evaluating potential project operation-related air quality impacts to the City Planning Division prior to project approval, construction and operation impacts would not be reduced below the required SCAQMD thresholds, and that future impacts could be significant and unavoidable. The GP EIR stated that although submission of a technical assessment for possible construction related impacts required by GP EIR Mitigation Measure 2-1 could reduce criteria air pollutant impacts for individual projects, the cumulative impact of all future construction emissions would result in significant and unavoidable impacts. In relation to the operation of buildout, the GP EIR stated that future activity would exceed SCAQMD thresholds as well, and that while GP EIR Mitigation Measure 2-2 requiring the submission of an emissions assessment for operation-related impacts for individual future development projects, could reduce individual project impacts, the cumulative impacts of the General Plan Update buildout would be significant and unavoidable. The GP EIR found that implementation of the General Plan Update could expose existing or planned sensitive receptors to criteria air pollutants and toxic air contaminants, but that GP EIR Mitigation Measure 2-3, requiring the submittal of a Health Risk Assessment (HRA) for certain new industrial or warehousing land uses requiring use of diesel trucks within 1,000 feet of a sensitive land use prior to project approval, would ensure that mobile sources of toxic air contaminants not covered under SCAQMD permits would be considered during subsequent project-level environmental review. The HRA prepared for those projects identified under GP EIR Mitigation Measure 2-3 would identify project-specific measures to minimize health risk and individual projects would be required to achieve the incremental risk thresholds established by SCAQMD, thus reducing impacts to a less than significant level. This, however, would only reduce the impact on a project-by-project basis, and the GP EIR concluded that the future buildout of the General Plan Update would result in cumulative impacts to sensitive receptors that are significant and unavoidable. The GP EIR found that GP EIR Mitigation Measure 2-4 would require that major sources of air pollutants achieve incremental risk thresholds when placed near a sensitive receptor, and GP EIR Mitigation Measure 2-5 requires measures to minimize odors, reducing both impacts to a less than significant level.

As previously discussed, no development is proposed as part of the project. Following approval of the proposed Master Plan Amendment and General Plan Land Use designation amendment and zone change at 260 North Oakland Avenue, all excluded parcels would be subject to the development standards of the underlying zoning. Those parcels within the amended Master Plan boundary

would continue to be subject to the development standards under the Master Plan, similar to existing conditions. As any potential future development would occur consistent with what was identified under buildout of the General Plan, implementation of the proposed project would not result in the generation of air quality emissions exceeding what was analyzed in the GP EIR. While a General Plan Amendment and zone change is proposed for 260 North Oakland Avenue, the proposed Medium Mixed-Use Residential designation is consistent with the existing multi-family residential use and density of the property. While the GP EIR concluded that buildout of the General Plan Update would increase the population within the City beyond SCAG forecasts and contribute to cumulative SoCAB nonattainment designations, resulting in a significant and unavoidable impact related to consistency with SCAQMD's Air Quality Management Plan, the proposed project would not result in more severe impacts from population growth. As discussed in detail in Section XIV, Population and Housing, the proposed project would not result in population growth beyond what was projected in the GP EIR. As such, future development following implementation of the proposed project would not result in the generation of air pollutant emissions beyond what was evaluated in the GP EIR. Additionally, GP EIR Mitigation Measures 2-1 and 2-2 would be applicable to all future development. While the air quality impacts of buildout of the General Plan would remain significant and unavoidable, even with the implementation of such mitigation, potential future development would occur under the umbrella of the General Plan buildout and air quality impacts resulting from implementation of the proposed project would be consistent with those identified in the GP EIR. It should also be noted that implementation of the proposed project would not increase air quality emissions or result in more severe impacts than those identified in the GP EIR.

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

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

Is	sues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
	filling, hydrological interruption, or other means?						
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	LTS (IS)	LTS	No	No	No	No
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	NI (IS)	NI	No	No	No	No
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	NI (IS)	NI	No	No	No	No

The GP EIR identified areas within the boundaries of the General Plan Update area where sensitive natural habitats occur to varying degrees, including Arroyo Seco, Eaton Canyon Corridor, Hastings Canyon, the San Rafael Hills, and a tract of land at the northwest of

the intersection of Crestford Drive and Florecita Drive; however, the land use changes included within the General Plan Update would be confined to the eight Specific Plan Areas within the City, none of which contain sensitive natural habitats and all of which are urbanized or suburban in character. Yet, because Arroyo Seco, Eaton Canyon Corridor, Hastings Canyon, and the San Rafael Hills all contain sensitive natural habitats, the GP EIR concluded that buildout of the General Plan Update could cause potentially significant impacts to biological resources. The GP EIR found that Arroyo Seco, Eaton Canyon, and Hastings Canyon all contain jurisdictional waters, and that the San Rafael Hills contain riparian and/or wetland habitat. No land use changes were proposed in these areas, however, the GP EIR states that buildout of the General Plan Update could have potentially significant impacts to sensitive species, sensitive natural communities, and jurisdictional waters and/or wetlands. GP EIR Mitigation Measures 3-1 through 3-6 would ensure that a qualified biologist would be involved in the assessment, mitigation, and monitoring of all projects occurring on land where impacts to biological resources could be potentially significant; impacts would then be reduced to a less than significant level following implementation of the mitigation measures. The IS prepared for the GP EIR described that development projects approved under the GP Update, including within the City's eight Specific Plan Areas, would be required to comply with the Chapter 8.52 – City Trees and Tree Protection Ordinance of the City's Zoning Code, and the Migratory Bird Treaty Act, as applicable. As such, the General Plan Update's impact on overland wildlife movement and migration would be less than significant and the General Plan Update would not conflict with the City's Tree Protection Ordinance. Additionally, the IS prepared for the GP EIR expressed that there are no adopted habitat conservation or natural community conservation plans within the City and, as such, concluded that no impacts to such plans would result from the General Plan Update.

As stated in the GP EIR, proposed land use changes would be confined to the eight Specific Plan Areas in the City, which includes the Master Plan area. The GP EIR concluded that the specific plan areas, inclusive of the existing and proposed amended Master Plan area, did not contain any sensitive natural habitats, jurisdictional waters, or wetlands. As such, there are no Mitigation Measures applicable to the proposed project. Similar to the General Plan Update, any potential future development on the parcels within the existing Master Plan boundary would be required to comply with the City's Master Street Tree Plan, Chapter 17.44 (Landscaping) of the City's Zoning Code, and the Migratory Bird Treaty Act (MBTA), as applicable. Therefore, implementation of the proposed project would not conflict with the City's tree protection ordinance and impacts to wildlife movement and migration would be less than significant. Additionally, as indicated in the IS prepared for the GP, that there are no adopted habitat conservation or natural community conservation plans within the City. Therefore, the proposed project would not result in impacts to any such plans.

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

Is	sues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
V.	CULTURAL RESOURCES Would the project:						
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	LTS-M	LTS-M(GP)	No	No	No	No
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	LTS-M	LTS-M(GP)	No	No	No	No
c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	LTS-M	LTS	No	No	No	No
d)	Disturb any human remains, including those interred outside of formal cemeteries?	LTS	LTS	No	No	No	No

The GP EIR found that, while the General Plan Update did not propose the alteration or demolition of any historic landmarks, any development under buildout of the General Plan Update could potentially impact a historic resource, as the GP EIR lists 7,440 historical resources throughout the City which meet at least one state or national criteria. The GP EIR states that the likelihood of encountering and impacting a historical resource is greater within a historic district, and that any Specific Plan Area that is within or adjacent to a historic district has a greater likelihood for impacting historical resources. The Central District, North Lake, and Fair Oaks/Orange Grove Specific Plan Areas contain and/or are adjacent to historic landmarks and/or historic districts. The GP EIR states that future projects

under the buildout of the General Plan Update can avoid significantly impacting historical resources by adhering to the PMC sections 17.61.030 - Design Review and 17.62 – Historic Preservation, to state and federal regulations, and to the policies of the City's Land Use Element, including Policy LU 8.5, Scale and Character of New Construction in Designated Landmark and Historic Districts. Additionally, GP EIR Mitigation Measure 9-4 would ensure that vibrations from construction activity would not impact architectural structures of historical significance. Impacts to archaeological resources would be reduced to a less than significant level upon implementation of GP EIR Mitigation Measure 4-1, which would halt construction upon discovery of an archaeological resource and require consultation with a registered archaeologist before proceeding with development. The GP EIR lists the Topanga Formation as an area sensitive to paleontological resources and states that implementation of GP EIR Mitigation Measure 4-2, which would enlist the service of a registered paleontologist prior to any grading activity in the vicinity of this area, as a sufficient measure to reduce the impact to a less than significant level. The GP EIR concluded that grading activities within the General Plan Update area are not expected to disturb human remains.

The Ford Place Historic District is a National Register Historic District contained within the boundaries of the existing Master Plan. Several properties within the Ford Place Historic District would remain within the amended Master Plan boundary; however, some parcels would be excluded from the Master Plan with implementation of the proposed project. Similar to the GP EIR, any potential future development within the existing and proposed amended Master Plan boundaries would avoid significantly impacting historical resources by adhering to the PMC sections 17.61.030 - Design Review and 17.62 – Historic Preservation, to state and federal regulations, and to the policies of the City's Land Use Element, including Policy LU 8.5, Scale and Character of New Construction in Designated Landmark and Historic Districts. Additionally, implementation of GP EIR Mitigation Measure 9-4 would ensure that vibrations from any construction activity adjacent to historic buildings would not impact architectural structures of historical significance. Similarly, any potential future development would avoid significantly impacting archaeological resources with implementation of GP EIR Mitigation Measure 4-1. Therefore, with implementation of GP EIR Mitigation Measures, proposed project impacts to historical and archaeological resources would be less than significant. The Master Plan area is not listed as a sensitive paleontological area; as such, future development would not significantly impact these resources.² As the Master Plan area is within the area analyzed by the GP EIR and found not likely to contain unknown human remains, with the required compliance with the Health and Safety Code, the proposed project would not significantly impact human remains.

The current CEQA Guidelines Appendix G checklist also includes assessment criteria for potential impacts to tribal cultural resources. Tribal cultural resources are defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe. These types of resources were analyzed in the GP EIR and Native American consultation was conducted. No sacred lands were identified during consultation in the City. The GP EIR concluded that the results of the Native American consultation did not result in new information or unknown impacts, but that while there are no known sacred lands within the City, the potential to uncover archaeological resources during earthmoving remains. Any potential future development within the existing and proposed amended Master Plan boundaries (including the excluded parcels) would be required to incorporate GP EIR Mitigation Measure 4-1 if

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

any archaeological resources, including tribal cultural resources, are discovered during construction, reducing the impact level to less than significant.

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

	ssues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
VI.	ENERGY Would the project:						
	Would the project:		I	I			
a)	Conflict with adopted energy conservation plans?	LTS (IS)	LTS	No	No	No	No
b)	Use non-renewable resources in a wasteful and inefficient manner?	LTS (IS)	LTS	No	No	No	No

Energy was not addressed in the GP EIR, as the IS prepared for the GP EIR found that impacts to this topic from buildout of the General Plan would be less than significant. The IS stated that Pasadena's Department of Water and Power had the capacity to service the projected buildout of the General Plan Update.³ Additionally, the IS stated that the City is wholly within the bounds of a Southern California Gas Company service area. Forecasted use from the buildout of the General Plan Update – which would be an increase in energy use - was found to be within the capacity of existing facilities.⁴ All new development and tenant improvements would be required to comply with the California Energy Code, Part 6 of the California Building Standards Code (Title 24), CALGreen standards, the City's Green Action Plan, the City's Green Building Standards Code (14.04.504), and the Open Space and Conservation Element of the General Plan, which together would increase efficiency and decrease consumption levels compared to existing structures built under the 2008 Building and Energy Efficiency Standards or targets established prior to those standards.⁵ As such, the intensification of energy use resulting from buildout of the General Plan Update would result in a less than significant impact.

The existing Master Plan area is located within the boundaries of the Central District Specific Plan area that was analyzed in the IS and the GP EIR. As discussed previously, no development is proposed as part of the project. Therefore, no net change in energy usage would occur with implementation of the proposed project. Any potential future development within the existing and proposed amended Master Plan boundaries would be required to comply with Title 24 of the California Energy Code, CALGreen standards, the City's

³ City of Pasadena, Initial Study/Notice of Preparation, 2013.

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

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

Green Action Plan, the City's Green Building Standards Code (14.04.504), and the Open Space and Conservation Element of the General Plan, which together would increase efficiency compared to existing structures built under the 2008 Building and Energy Efficiency Standards or targets established prior to those standards. As such, any potential future development within the existing and proposed amended Master Plan area is not expected to exceed forecasted use captured under the IS and GP EIR. Therefore, implementation of the proposed project would result in less than significant impacts related to energy.

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

Issues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
VII. GEOLOGY AND SOILS Would the project:						
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:						
 Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to California Geological Survey Special Publication 42. 	LTS (IS)	LTS	No	No	No	No
ii. Strong seismic ground shaking?	LTS (IS)	LTS	No	No	No	No
iii. Seismic-related ground failure, including liquefaction as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other	LTS (IS)	LTS	No	No	No	No

Issues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
substantial evidence of known areas of liquefaction?						
iv. Landslides as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of landslides?		LTS	No	No	No	No
b) Result in substantial soil erosion or the loss of topsoil	LTS (IS)	LTS	No	No	No	No
 c) Be located on a geologic un or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off- site landslide, lateral spreading, subsidence, liquefaction or collapse? 	at a	LTS	No	No	No	No
d) Be located on expansive soi as defined in Table 18-1-B o the Uniform Building Code (1994), creating substantial risks to life or property?		LTS	No	No	No	No

Issues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	NI (IS)	NI	No	No	No	No

Geology and soils were addressed in the IS prepared for the GP EIR, which found that impacts to this resource from the implementation of the General Plan Update would be less than significant. According to the Safety Element of the General Plan and as concluded in the IS, one Alquist-Priolo earthquake fault zone along the Raymond Fault, an active strand of the Sierra Madre Fault, and a possibly active strand of the Sierra Madre Fault pass through the City, and the San Fernando and Whittier Faults are located 10.5 and 15.5 miles from the City, respectively. All active faults could experience a surface rupture in the lifetimes of development resulting from buildout of the General Plan Update. However, the Safety Element of the General Plan, California Building Code, the City's Building and Safety Division, and the City Building Code would require all new development to comply with policies and regulations for surface ruptures and would be required to conduct and submit engineering geology and soils reports prior to permit approval.

Policies within the above stated regulatory framework would also enforce specific building standards related to seismic ground shaking, as the soil in the City is either sandy, stony, or gravelly loam formed on the alluvial fan adjacent to the San Gabriel Mountains, which are soil types characterized as loose and porous, and thus, susceptible to seismic ground shaking. Geotechnical investigations would be required for all new development approval as the City contains zones where liquefaction could occur near the Arroyo Seco, in the San Rafael Hills, and near Eaton Canyon and Hastings Canyon. State and City building codes contain standards that new development must comply with pertaining to liquefaction as well, which buildout under the General Plan Update would be subject to. The geotechnical investigations would also need to cover the potential for landslides and building designs would be required to comply with slope standards, as the City is susceptible to earthquake-induced landslides originating in the San Gabriel Mountains and San Rafael Hills.

The IS concluded that natural water soil erosion potential in the City is low, but future construction has the possibility to expose soil to erosion. However, all construction activity would be required to practice soil erosion Best Management Practices (BMP) and adhere to

a transport and grading control plan as required by the Los Angeles County Stormwater Program. Further, the above-mentioned threats of landslides and liquefaction in addition to the threat of lateral spreading and/or collapse due to the project location and quality of the soil would need to be included in each geotechnical investigation. Groundwater extraction would be monitored by the Raymond Basin Management Board to ensure the continued prevention of regional subsidence. Finally, each geotechnical investigation would be required to address soil expansion and each project would be required to comply with the associated standards of the Building and Safety Division and California Building Code.

As the City is urbanized, septic tanks would not be utilized during buildout of the General Plan Update. Development would include sewer lateral lines and would not rely on septic tanks or alternative wastewater disposal systems. With adherence to all regulations and policies, submission of a geotechnical report, and implementation of appropriate practices during construction, the IS concluded that buildout of the General Plan Update would have a less than significant impact to geology and soils.

The existing Master Plan area is located within the boundaries of the Central District Specific Plan area that was analyzed in the IS and the GP EIR and would not be exposed to any different or greater risks or associated potential impacts related to geology and soils than those identified for buildout of the General Plan Update. As discussed previously, no development is proposed as part of the project. Any potential future development within the existing and proposed amended Master Plan boundaries would be required to comply with all of the same building code requirements that would minimize the geology and soils related impacts of buildout of the General Plan Update. As such, implementation of the proposed project would not cause significant impacts beyond those analyzed in the IS for the GP EIR. Additionally, any potential future development within the existing and proposed amended Master Plan boundaries would be required to adhere to the same regulations, policies, and standards pertaining to geology and soils impacts, both during construction and operation, as any new development in the City would, including the preparation of project-specific geotechnical investigations for individual development projects. Therefore, similar to the GP EIR, implementation of the proposed project would have less than significant impacts related to geology and soils.

	ssues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
VII	. GREENHOUSE GAS EMISSIO	ONS					
	Would the project:						
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	S-U	Less than GP EIR Impacts	No	No	No	No
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	LTS	LTS	No	No	No	No

The GP EIR concluded that while certain improvements under the buildout of the General Plan Update would reduce greenhouse gas (GHG) emissions per service population, the buildout would still create more GHG emissions than existing conditions and would not achieve long-term GHG reduction goals under Executive Order S-03-05 and target levels of AB 32. With implementation of GP EIR Mitigation Measure 5-1, which required the City to prepare a community Climate Action Plan/GHG Reduction Plan, the impacts related to GHG emissions would remain significant and unavoidable. According to the GP EIR, forecasting tools to measure future emissions from transportation, energy, waste, water/wastewater, and other sources (e.g., landscaping equipment, light commercial equipment, and construction equipment) provided a short-term projection for future levels. However, these projections were found to be insufficient given the uncertainty of how the General Plan Update buildout would be phased. The GP EIR found that without implementation of a community Climate Action Plan/GHG Reduction Plan update buildout would be phased. The GP EIR found that without implementation of a community Climate Action Plan/GHG Reduction Plan and under current state and federal regulations, the population growth that would result from buildout of the General Plan Update would prevent the City from meeting AB 32 targets for emissions. While buildout would improve transportation by creating a live/work environment, offering options for alternative and multi-modal mobility, and utilizing energy efficient design and technology, the GP EIR stated that the resulting population growth would still create more emissions than existing conditions. The community Climate Action Plan/GHG Reduction Plan would establish community-wide targets, monitoring, and

inventory reporting standards. The GP EIR concluded that it is uncertain whether buildout would create significant and unavoidable GHG related impacts without knowing the phasing of buildout or what future federal, state, and local programs will exist at the time.

Further, the GP EIR found that the General Plan Update would be consistent with applicable GHG reduction plans. As the General Plan Update would integrate statewide strategies and associated GHG emissions reductions and would propose policies that would also contribute to reducing GHG emissions, the GP EIR concluded the General Plan Update would be consistent with the CARB Scoping Plan. The General Plan Update and its policies would also be consistent with the applicable SCAG 2012 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS) goals. Finally, the proposed General Plan Update would include various policies consistent with the goals and initiatives of the City's Green City Action Plan. Therefore, the GP EIR concluded that impacts related to conflicts with applicable GHG reduction plans would be less than significant.

As previously discussed, no development is proposed as part of the project. Following approval of the proposed Master Plan Amendment and General Plan Land Use designation amendment and zone change at 260 North Oakland Avenue, all excluded parcels would be subject to the development standards of the underlying zoning. Those parcels within the amended Master Plan boundary would continue to be subject to the development standards under the Master Plan, similar to existing conditions. As any potential future development would occur consistent with what was identified under buildout of the General Plan, implementation of the proposed project would not result in the generation GHG emissions exceeding what was analyzed in the GP EIR. Although the GP EIR identified is standards under the master Plan buildout, the GP EIR. Although the GP EIR identified less than significant. However, as GHG emissions impacts are recognized exclusively as cumulative impacts and any potential future development would occur under the umbrella of the General Plan buildout, GHG impacts resulting from implementation of the proposed project would be consistent with those identified in the GP EIR. It should also be noted that implementation of the proposed project would not increase GHG emissions or result in more severe impacts than those identified in the GP EIR.

Any future development following implementation of the proposed project would be subject to the policies of the City's current Climate Action Plan, which was adopted in 2018 to fulfill the requirements under GP EIR Mitigation Measure 5-1, as well as any additional climate action/GHG reduction plans established locally, state-wide, or federally at the time. Therefore, the proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the GHG emissions and the impacts would be less than significant.

	ssues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
IX.	HAZARDS AND HAZARDOUS Would the project:	S MATERIALS					
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	LTS	LTS	No	No	No	No
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	LTS	LTS	No	No	No	No
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	LTS	LTS	No	No	No	No
d)	Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	LTS	LTS	No	No	No	No

	lssues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	NI (IS)	NI	No	No	No	No
f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	LTS (IS)	LTS	No	No	No	No
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	LTS	LTS	No	No	No	No
h)	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	LTS	LTS	No	No	No	No

The GP EIR found that buildout in accordance with the General Plan Update would involve the transport, use, and/or disposal of hazardous materials. However, impacts would be less than significant as construction would be short-term and in compliance with all California Health and Safety Code, Occupational Safety and Health Administration, and SCAQMD regulations. Project operations under the General Plan Update would reduce industrial uses compared to existing conditions and all new development would comply with the City's Safety Element. The GP EIR found that 844 hazardous material sites fall within the City or within a 0.25-mile radius thereof. However, compliance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), Resource Conservation and Recovery Act (RCRA), California Code of Regulations, Title 22, and related requirements, as well as adherence to the City's Land Use Element Policy LU 3.5 Hazardous Uses would reduce potential impacts to a less than significant level.

The GP EIR concluded that project development could affect the implementation of an emergency response or evacuation plan due to population growth, development intensity, and road closures during construction. However, coordination with the Pasadena Fire Department (PFD) and compliance with the Los Angeles County Operational Area Emergency Response Plan and the City's Emergency Operation Plan would ensure each project and buildout of the General Plan Update has a less than significant impact related to this topic. Finally, the GP EIR found that areas of the City near Very High Fire Hazard Severity Zones (VHFHSZs) could expose structures and/or residences to fire hazards during buildout of the General Plan Update. However, compliance with the International Fire Code, California Fire Code, and the City's Safety Element would ensure that future development under the General Plan Update would not expose people or structures to substantial wildfire hazards, and impacts would be less than significant.

The IS prepared for the GP EIR found that no portion of the City is located within an airport land use plan or within two miles of an airport, and no related impact would occur. Furthermore, the IS prepared for the GP EIR concluded that the General Plan Update would not allow development of buildings with increased height that affect flight patterns or pose a safety hazard, and any related impacts would be less than significant.

As previously discussed, no development is proposed as part of the project. Similar to the buildout analyzed in the GP EIR, construction of any potential future development within the existing and proposed amended Master Plan boundaries could potentially involve the transport, use, and/or disposal of hazardous materials. However, the zoning designations of the excluded parcels do not allow heavy industrial uses; the CD-MU-N zone allows for light manufacturing uses only, while the CD-RM-87 zone does not allow any industrial uses. Additionally, construction associated with any potential individual future development projects would be temporary in nature, and all development would comply with the California Health and Safety Code, OSHA, and SCAQMD regulations. The proposed project is not expected to result in significant impacts related to the transport, use, and/or disposal of hazardous materials. The GP EIR did not list any hazardous material sites within the boundaries of the Master Plan area; if a site were to be located with a 0.25-mile radius of the existing or proposed amended Master Plan area, any potential future development would be required to comply with CERCLA, RCRA, California Code of Regulations, Title 22, and related requirements, as well as adherence to the City's Land Use Element Policy LU 3.5: Hazardous Uses, and as a result any related impacts would be less than significant.

Any potential future development following implementation of the proposed project could result in temporary road closures. Similar to the GP Update analyzed in the GP EIR, all future development would be required to coordinate with the PFD. Additionally, any potential future development would not interfere with the Los Angeles County Operational Area Emergency Response Plan or the City's Emergency Operation Plan. Furthermore, no potential future development project would be permitted to block any designated evacuation routes. Therefore, similar to the GP EIR, the proposed project is not expected to significantly affect the implementation of an emergency response or evacuation plan.

The current CEQA Guidelines Appendix G checklist also includes assessment criteria for potential impacts to wildfire for those areas located within or near a state responsibility area or on lands classified as VHFHSZs. The GP EIR identified the western and northeastern portions of the City include lands classified as VHFHSZs and within a local responsibility area.⁶ The existing and proposed amended Master Plan area is not located within a Very High Fire Hazard Severity Zone for local or state responsibility areas, and no impact would occur.⁷

⁶ CAL Fire, Fire Hazard Severity Zone Viewer, available at: <u>https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/</u>, accessed May 9, 2024.

⁷ City of Pasadena. 2015 General Plan EIR. Figure 5.6-1, Fire *Hazard Severity Zones*.

	Issues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
Х.	HYDROLOGY AND WATER Q Would the project:	UALITY					
a)	Violate any water quality standards or waste discharge requirements?	LTS	LTS	No	No	No	No
b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	LTS	LTS	No	No	No	No
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	LTS	LTS	No	No	No	No
d)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of	LTS	LTS	No	No	No	No

	Issues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
	stream or river, substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or offsite?						
e)	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	LTS	LTS	No	No	No	No
f)	Otherwise substantially degrade water quality?	LTS	LTS	No	No	No	No
g)	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or dam inundation area as shown in the City of Pasadena adopted Safety Element of the General Plan or other flood or inundation delineation map?	LTS	LTS	No	No	No	No
h)	Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	NI (IS)	NI	No	No	No	No
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding,	LTS	LTS	No	No	No	No

	Issues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
	including flooding as a result of the failure of a levee or dam?						
j)	Inundation by seiche, tsunami, or mudflow?	LTS	LTS	No	No	No	No

The GP EIR found that buildout of the General Plan Update could increase the amount of impervious surfaces in the City of Pasadena resulting in an increase in surface water flows into drainage systems within the watershed, potentially resulting in erosion, siltation, and/or flooding. However, the city is primarily developed and urbanized, and all development would be required to adhere to applicable local, state, and federal hydrology and water quality regulations and standards. Developments would be required to implement site-specific design measures, low-impact development, and best management practices (BMPs), including infiltration features that contribute to groundwater recharge and minimize stormwater pollution, runoff, erosion, siltation, and/or flooding. As also discussed in the GP EIR, as most of the General Plan Update area is already built out, future development is not anticipated to result in a significant increase in impervious surfaces that could lead to substantially reduced groundwater recharge.

As previously discussed, no development is proposed as part of the project. While the project would include amending the General Plan Land Use designation to Medium Mixed-Use Residential and changing the zoning to Central District Residential Multi-Family (CD-RM-87) at 260 North Oakland Avenue, such changes would align with the existing and surrounding uses of that parcel. All other excluded parcels would remain subject to the land use designations identified in the General Plan Land Use diagram and would be subject to the development standards of the underlying zoning and water quality regulations, including those related to stormwater pollution, runoff, erosion, siltation, and/or flooding. As such, project impacts associated with the aforementioned topics would be less than significant.

With regard to inundation, the GP EIR stated that General Plan Update buildout would not place any housing within the dam inundation zone of Devil's Gate Dam but would involve some increase in residential density in areas within the dam inundation zone for Eaton Wash Dam. As the project site would not be located within the dam inundation zones of Devil's Gate Dam or Eaton Wash Dam, impacts would be less than significant. While the GP EIR found that portions of the City are susceptible to inundation by mudflows, none of the proposed development under the General Plan Update fell within these susceptible areas. As such, project impacts related to

inundation by mudflows would also be less than significant. The IS prepared for the GP EIR also found that no portions of the City of Pasadena are located within a 100-year floodplain and, therefore, no impact related to floodplains would occur.

Is	ssues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
XI.	LAND USE AND PLANNING Would the project:	3					
a)	Physically divide an established community?	LTS (IS)	LTS	No	No	No	No
b)	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	LTS	LTS	No	No	No	No
c)	Conflict with any applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP)?	NI (IS)	NI	No	No	No	No

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

As determined in the GP EIR and in accordance with California Government Code Section 65302, the General Plan Update addressed two of the seven required Elements: Land Use and Mobility. The GP EIR also determined that the General Plan Update would be consistent with the SCAG RTP/SCS, as is required. Further, implementation of the General Plan Update could result in a net increase

of 12,312 additional residential dwelling units and 10,988,959 square feet of nonresidential uses; this net increase would be framed and regulated by the goals and policies of the City's Land Use and Mobility Elements, which accommodate growth through 2035. Changes to prior land use designations proposed by the General Plan Update primarily allowed for more mixed-use and redevelopment of existing industrial uses for more integrated non-residential land uses that would foster local goods and services and business in the City. Buildout capacity would be limited by the following standards for density (du/ac) and FAR: commercial uses with FARs between 0.0 and 3.0; Research and Development designations (which would replace Industrial designation) with FARs of 0.9 and 0.0-1.25, respectively; Low Mixed Use (0.0–1.0 FAR, 0–32 du/ac), Low Medium Mixed Use (0.0–1.75 FAR, 0–48 du/ac), Medium Mixed Use (0.0–2.25 FAR, 0–87 du/ac), and High Mixed Use (0.0–3.0 FAR, 0–87 du/ac). The GP EIR concluded that modifying land use designations and the corresponding buildout would create a positive live/work environment, which would enhance quality of life while reducing environmental impacts related to consumption, pollution, and emissions due to transit orientation, reduced commutes, and improved multi-modal options.

Moreover, the GP EIR found that additional goals and policies added to the Land Use and Mobility Elements by the General Plan Update would ensure new development would be compatible with the existing character of the City while enhancing urban design and regulating sustainable growth. The GP EIR stated that in addition to the goals and policies of the Land Use and Mobility Elements, all new development would also be required to comply with Title 17 of the PMC and applicable design guidelines. The GP EIR stated that additional environmental impacts from changes to land use patterns and building intensity and design, such as impacts to air quality, hazards, flooding, and traffic, would be addressed individually in each corresponding section. As such, the GP EIR found that the proposed updates would not conflict with any existing applicable policies or regulations and would be implemented in such a way that creates compatibility within the plan area. As such, impacts to land use and planning were determined to be less than significant in the GP EIR.

The Master Plan area is located in the Walnut Transit neighborhood at the northern end of the Central District Specific Plan Area. Walnut Transit is a medium-density mixed-use neighborhood, bounded by Los Robles Avenue to the west, Hudson and Lake Avenues to the east, Corson Street to the north, and Union Street to the south. The subarea is located just southwest of the Metro A Line Lake Station. Activity in the subarea is primarily focused along the east/west Walnut Street corridor. Existing uses are predominantly commercial offices, multi-family residential, and religious/educational institutions, including the Fuller Theological Seminary. As previously described, no development is proposed as part of the project. While the project would include amending the General Plan Land Use designation from Institutional to Medium Mixed-Use Residential and changing the zoning from Public-Semi Public (PS) to Central District Residential Multi-Family (CD-RM-87) at 260 North Oakland Avenue, such changes would align with the existing and surrounding residential uses of that parcel. All other excluded parcels would remain subject to the land use designations identified in the General Plan Land Use diagram and would be subject to the development standards of the underlying zoning. As described in the GP EIR, the Land Use Element includes a goal to have a mix of land uses that meets the diverse needs of Pasadena's residents and businesses, fostering improved housing conditions, offering a variety of employment and recreation opportunities, and supporting a healthy population while protecting the environment. Land Use Element Policy Land Use 2.1 refers to the provision of opportunities for a full range of housing types, densities, locations, and affordability levels to address the community's fair share of regional, senior, and workforce housing needs, while the types, densities, and location of housing shall be determined by the Land Use Diagram and reflect

the projected needs specified in the Housing Element. CDSP Policy 14a refers to the provision of high-quality multi-family residential infill at an urban scale in proximity to transit and services. CDSP Policy 14b refers to allowing mixed-use housing and commercial uses to enable residents to live close to businesses and jobs and support a vibrant neighborhood. The project's amendments of the parcel at 260 North Oakland would be consistent with the parcel's existing multi-family residential uses and would be consistent with the parcel's existing multi-family residential uses and would be consistent with the character of the Walnut Transit neighborhood. In addition, the Master Plan and all involved parcels are located in proximity to transit such as the Metro A Line, as well as services and businesses. Therefore, project impacts related to the physical division of an established community and consistency with applicable land use plans and policies would be less than significant.

In addition, as indicated in the IS prepared for the General Plan Update, there are no adopted habitat conservation or natural community conservation plans within the City. Therefore, the project would not result in impacts to such plans.

Issues and Supporting Data Sources:		GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
XII	MINERAL RESOURCES Would the project:						
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	NI (IS)	NI	No	No	No	No
b)	Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	NI (IS)	NI	No	No	No	No

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

As previously discussed, no development is proposed as part of the project. Future development within the existing and proposed amended Master Plan boundaries would be located within the same boundaries as those analyzed in the GP EIR and would not be located within any of the identified Mineral Resource Sectors. Therefore, the project would not affect any mineral resources.

	Issues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
XII	I. NOISE Would the project result in:						
a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	LTS	LTS	No	No	No	No
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	S-U	Less than GP EIR Impacts	No	No	No	No
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	LTS	LTS	No	No	No	No
d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	S-U	Less than GP EIR Impacts	No	No	No	No
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project	NI (IS)	NI	No	No	No	No

	Issues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
	expose people residing or working in the project area to excessive noise levels?						
f)	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	LTS (IS)	LTS	No	No	No	No

The GP EIR analyzed impacts to noise from construction and operation of buildout of the General Plan Update, including stationary noise, traffic noise, rail noise, industrial noise, and all affiliated levels of vibration. The GP EIR assessed the updates for compatibility with the City's Land Use and Noise Elements. The GP EIR concluded that increased stationary and traffic noises from buildout would have a less than significant impact. Additionally, if residential and sensitive land uses continue to be developed in compatible areas, and those uses that are compatible with transportation noises are developed in compliance with the Noise and Land Use Elements, as well as other state and local regulations pertaining to noise, then this impact would also be less than significant.

Regarding exposure to long-term groundborne vibration, the GP EIR found that both rail and industrial uses could cause a potentially significant impact. Portions of the City are designated for and operate as industrial uses. GP EIR Mitigation Measure 9-1 requires all industrial projects to submit a vibration study providing evidence that vibration-causing activity would not exceed levels set forth by the Federal Transit Administration (FTA). In addition, the City is served by the Metro A (Gold) Line. The portion of this line in the City runs north-south parallel to Arroyo Parkway and then turns to an east-west orientation along I-210, with its current terminus in the City of Azusa. GP EIR Mitigation Measure 9-2 requires all new development within screening distance of the A (Gold) Line to submit a study conducted by an acoustical engineer to the City's Planning Division that demonstrates vibration impacts and possible reduction measures. Implementation of GP EIR Mitigation Measures 9-1 and 9-2 would reduce groundborne vibration impacts to a less than significant level. The GP EIR concluded that short-term impacts from construction vibration would be significant and unavoidable for buildout of the General Plan Update; GP EIR Mitigation Measure 9-3 would reduce impacts to sensitive receptors within 25 feet of activity by substituting less intensive equipment when possible and utilizing vibration reduction techniques; however, because each new development involved in the buildout is project-specific, the GP EIR determined it is not possible to mitigate this impact below a

significant and unavoidable level. GP EIR Mitigation Measure 9-4 further addresses vibrations from construction on sensitive architectural structures within 25 feet of activity; yet, similar to construction vibration impacts to sensitive receptors, this impact would remain significant and unavoidable in the context of total buildout as each project would present individual circumstances. GP EIR Mitigation Measure 9-5 requires all construction permits be issued only after submission of a plan for noise and vibration reducing BMPs for all development within 500 feet of a noise-sensitive receptor; still, the GP EIR concluded that this mitigation measure would not reduce the impacts of construction activities to a less than significant level as the phasing, location, and magnitude of future development under buildout is unknown. Therefore, the GP EIR concluded that construction related noise impacts are significant and unavoidable.

As described above, no development is proposed as part of the project. While the project would include amending the General Plan Land Use designation from Institutional to Medium Mixed-Use Residential and changing the zoning from Public-Semi Public (PS) to Central District Residential Multi-Family (CD-RM-87) at 260 North Oakland Avenue, such changes would align with the existing and surrounding residential uses of that parcel. All other excluded parcels would remain subject to the land use designations identified in the General Plan Land Use diagram and would be subject to the development standards of the underlying zoning. As indicated in PMC Section 17.30.030, permitted uses under CD-RM-87 do not include industrial uses. The CD-MU-N zone, which applies to some of the excluded parcels, allows for limited light manufacturing uses, however no heavy industrial uses are permitted within this zone. In addition, the project is located in the vicinity of the Metro A (Gold) Line. Therefore, GP EIR Mitigation Measures 9-1 and 9-2 would be applicable to the project. Consistent with the GP EIR, implementation of these mitigation measures would reduce potential project impacts associated with long-term groundborne vibration to a less than significant level. Furthermore, any potential future construction activities would be subject to GP EIR Mitigation Measures 9-3, 9-4, and 9-5, which would reduce any potential future constructionrelated vibration and noise impacts, and any such impacts would be consistent with and less than those identified in the General Plan EIR. Consistent with the GP EIR and with buildout in accordance with the General Plan Update, operation-related noise would not be generated in in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies and would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

The IS prepared for the GP EIR found that no portion of the City is located within an airport land use plan or within two miles of an airport, and no impact would occur. Furthermore, the IS prepared for the GP EIR concluded that noise from helicopter flights would be periodic and, thus, the impact resulting from noise from private use heliports would be less than significant.

	ssues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
XI\	/. POPULATION AND HOUSING	G					
	Would the project:						
a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	LTS	LTS	No	No	No	No
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	LTS (IS)	LTS	No	No	No	No
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	LTS (IS)	LTS	No	No	No	No

The GP EIR concluded that while population, housing, and employment growth induced by buildout of the General Plan update would likely surpass SCAG's forecast, the impact of buildout would be less than significant. The General Plan Update accommodates growth in all sectors; it permits new housing opportunities, and it opens more opportunities for employment. The GP EIR found that the City-wide utilities and infrastructure required to service the projected buildout population would be sufficient, and each service is discussed in more detail within its individual section of this document (i.e., Hydrology and Water Quality, Public Services, Transportation and Traffic, Utilities and Service Systems). One of the central objectives of the General Plan Update is to create a housing/job balance within a more work/live environment; the GP EIR found that buildout would achieve this goal, which would offset the detrimental impacts that growth would have. The IS prepared for the GP EIR found that the General Plan Update would increase the number of dwelling units by allowing higher intensity residential uses and mixed-use development and that growth in accordance with the proposed General

Plan Update was not expected to displace existing housing or people, as the General Plan Update would increase the number of dwelling units by allowing higher intensity residential uses and mixed-use development. Therefore, the IS concluded that the impacts related to displacement of housing and people would be less than significant.

As described above, no development is proposed as part of the project. While the project would include amending the General Plan Land Use designation from Institutional to Medium Mixed-Use Residential and changing the zoning from Public-Semi Public (PS) to Central District Residential Multi-Family (CD-RM-87) at 260 North Oakland Avenue, such changes would align with the existing and surrounding residential uses of that parcel. The parcel located at 260 North Oakland currently consists of 10 multi-family units. The Medium Mixed-Use Residential land use designation would permit a density of up to 87 dwelling units per acre. Based on the size of the approximately 0.41-acre parcel, the property at 260 North Oakland Avenue could support up to 36 dwelling units, which would support the provision of housing in the City and result in a nominal increase in the population of the City. Under the project, all other excluded parcels would remain subject to the land use designations identified in the General Plan Land Use diagram and would be subject to the development standards of the underlying zoning, CD-MU-N. Buildout of these parcels would occur consistent with the buildout considered in the GP EIR and would not induce substantial unplanned population growth in an area, either directly or indirectly.

Is	sues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
XV	Would the project result in s					of new or physically altered go ould cause significant environi	
	in order to maintain accepta	able service ra	tios, response	times or other	performance objectives	for any of the public services:	
a)	Fire protection?	LTS	LTS	No	No	No	No
b)	Police Protection?	LTS	LTS	No	No	No	No
c)	Schools?	LTS	LTS	No	No	No	No
d)	Libraries?	LTS	LTS	No	No	No	No

The General Plan Update area is within the City and is serviced by the PFD. Pasadena Police Department, Pasadena Unified School District, and the Pasadena Public Library. The PFD operates eight stations throughout the City, with an average daily staff of 51. The GP EIR found that, while population growth and increased infrastructure from buildout of the General Plan Update would result in higher demand for service from the PFD and possibly require new or expanded facilities, compliance with existing regulations and coordination during road closures related to future construction would ensure impacts remain less than significant. The Pasadena Police Department aims to employ 1.63 officers per capita and 0.72 officers per 1,000 residents. The GP EIR found that, while population growth and increased infrastructure from buildout of the General Plan Update would result in higher demand for service from the Pasadena Police Department and possibly require new or expanded facilities, compliance with existing regulations would ensure impacts remain less than significant. The GP EIR concluded that while population growth from buildout of the General Plan Update would create new students in the population, it is unlikely that forecasted growth would exceed the capacity of existing facilities; additionally, per SB 50, all new development in the City is subject to a School Impact Fee to ensure that school services continue to meet the needs of the population. The Pasadena Public Library operates 10 facilities, all within 1 mile or walking distance of each residence. The GP EIR found that while buildout of the General Plan update would induce population growth, the estimated growth would not exceed the Pasadena Public Library's capacity to serve the community; additionally, all new development is subject to fees and taxes that fund public services, including a Library Special Tax, to ensure continued funding for the Pasadena Public Library. The GP EIR concluded that all impacts to public services would be less than significant.

As described above, no development is proposed as part of the project. While the project would include amending the General Plan Land Use designation from Institutional to Medium Mixed-Use Residential and changing the zoning from Public-Semi Public (PS) to Central District Residential Multi-Family (CD-RM-87) at 260 North Oakland Avenue, such changes would align with the existing and surrounding residential uses of that parcel. Accordingly, the parcel located at 260 North Oakland, which currently consists of 10 multi-family units, would be permitted a density of up to 87 dwelling units per acre if a future residential project is proposed at that location. Based on the size of the approximately 0.41-acre parcel, up to 36 dwelling units could be developed, which would result in a nominal increase in the City's population and marginal effect on demand for police and fire protection services, schools, and libraries. Furthermore, expansion or replacement of the existing 10-unit building would require the payment of development fees and school impact fees. Under the project, all other excluded parcels would oremain subject to the land use designations identified in the CD-RM-87 and CD-MU-N zones. Buildout of these parcels would occur consistent with the buildout analyzed in the GP EIR and would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services. Therefore, project impacts related to public services would be consistent with the impacts identified in the GP EIR and less than significant.

Is	sues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
XV	I. RECREATION						
	Would the project:	Π		Γ	Γ	Γ	
a)	Would the project result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?	LTS	LTS	No	No	No	No
b)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	LTS	LTS	No	No	No	No
c)	Does the project include recreational facilities or require the construction or expansion of recreational	LTS	LTS	No	No	No	No

Issues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
facilities, which might have an adverse physical effect on the environment?						

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

As described previously, no development is proposed as part of the project. While the project would include amending the General Plan Land Use designation from Institutional to Medium Mixed-Use Residential and changing the zoning from Public-Semi Public (PS) to Central District Residential Multi-Family (CD-RM-87) at 260 North Oakland Avenue, such changes would align with the existing and surrounding residential uses of that parcel. Accordingly, the parcel located at 260 North Oakland, which currently consists of 10 multi-family units, would be permitted a density of up to 87 dwelling units per acre should a future residential project be proposed at that location. Based on the size of the approximately 0.41-acre parcel, up to 36 dwelling units could be developed, which would result in a nominal increase in the City's population and marginal effect on demand for parks and recreational areas. Furthermore, expansion or replacement of the existing 10-unit building would require the payment of development/in-lieu fees. Under the project, all other excluded parcels would remain subject to the land use designations identified in the General Plan Land Use diagram and would be subject to the development standards of the underlying zoning, which include the CD-RM-87 and CD-MU-N zones. Although not zoned for open space, these parcels would be permitted or conditionally permitted to develop recreational uses in accordance with PMC Section 17.30.030. Furthermore, buildout of these parcels would occur consistent with the buildout analyzed in the GP EIR, which has

determined that impacts to recreation would be less than significant with adherence to existing regulations. Based on the analysis above, project impacts related to public services would be consistent with the impacts identified in the GP EIR and less than significant.

	Issues and Supporting Data Sources: /II. TRANSPORTATION/TRAFFIC	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
~~	Would the project:						
a)	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	LTS-M	LTS-M(GP)	No	No	No	No
b)	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	S-U	LTS	No	No	No	No
c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a	NI (IS)	NI (IS)	No	No	No	No

	Issues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
	change in location that results in substantial safety risks?						
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	LTS	LTS	No	No	No	No
e)	Result in inadequate emergency access?	LTS	LTS	No	No	No	No
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	LTS-M	LTS-M(GP)	No	No	No	No

The GP EIR analyzed the General Plan Updates for impacts to traffic and transportation based on calculations for vehicle miles traveled (VMT) per capita, vehicle trips (VT) per capita, proximity and quality of bicycle networks, proximity and quality of transit networks, and pedestrian accessibility, as well as compatibility with the City's Mobility Element. The GP EIR concluded that implementation of the General Plan Update would not conflict with the City's plans, ordinances, or policies establishing measures of effectiveness for the performance of the complete circulation system, and would comply with adopted policies, plans, and programs for alternative transportation. It found that transportation performance would improve, and pedestrian and bicycle accessibility would increase from buildout of the General Plan Update, which would satisfy Mobility Plan goals around livability, non-motorized transit, and economic viability. The GP EIR stated that all improvements within the City are funded through the City's transportation fee program with the exception of bicycle and pedestrian improvements. The proposed General Plan Update included Policy 2.10, requiring the City to amend the existing transportation impact fee to include pedestrian and bicycle improvements. The GP EIR concluded that without full funding of circulation improvements, the General Plan Update would result in a significant impact. As such, GP EIR Mitigation Measure

13-1 was identified in the GP EIR, which required the City to update the transportation impact fee program in place at the time the GP EIR was prepared by 2020 to ensure that impacts to traffic and transportation resulting from buildout of the General Plan Update remain less than significant. The City implemented GP EIR Mitigation Measure 13-1 and updated the transportation impact fee program, as mandated by AB 1600 legislation, as codified by California Code Government Section 66000 et seq.

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

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

As described previously, no development is proposed as part of the project. While the project would include amending the General Plan Land Use designation from Institutional to Medium Mixed-Use Residential and changing the zoning from Public-Semi Public (PS) to Central District Residential Multi-Family (CD-RM-87) at 260 North Oakland Avenue, such changes would align with the existing and surrounding residential uses of that parcel. The project does not include modifications to roadways and infrastructure. In addition, under the project, all other excluded parcels would remain subject to the land use designations identified in the General Plan Land Use diagram and would be subject to the development standards of the underlying zoning, which include the CD-RM-87 and CD-MU-N zones. The project site is already urbanized, and buildout of these parcels would occur consistent with the buildout analyzed in the GP EIR. Nonetheless, any potential future developments in the project area would be in proximity to and served by various transit and multi-modal facilities including two Metro A (Gold) line stops within 0.5-mile of the Fuller campus, multiple bus stops along Walnut Street and Los Robles Avenue adjacent to or in the immediate vicinity of the campus, and the Union Street cycle track along the south side of the campus. Thus, any potential future developments would increase the City's population in proximity to quality transit and bicycle facilities. In addition, the Fuller campus is in a pedestrian friendly portion of Pasadena, with numerous commercial businesses and services in the immediate vicinity and sidewalks and other pedestrian amenities along all surrounding and intersecting roadways. Thus, pedestrian accessibility of the involved parcels is high. Finally, any potential future development would be subject to whatever transportation impact fee is in effect at the time of permitting, per GP EIR Mitigation Measure 13-1, which would ensure improvements continue. As such, project impacts related to proximity and quality of bicycle networks, proximity and quality of transit networks, pedestrian accessibility, circulation-related hazards, and emergency access would be less than significant.

Since the publication of the GP EIR, the Los Angeles County CMP has been dissolved. Additionally, as indicated in the IS prepared for the GP EIR, there are no airports within two miles of the City. Therefore, the project would not affect air traffic patterns and no impact would occur.

The current CEQA Guidelines Appendix G checklist also recommends considering a project's potential to conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), which requires the use of VMT as the updated measurement of traffic impacts, replacing the level of service (LOS) method previously used. As discussed, the GP EIR included a City-wide VMT analysis for impacts to traffic and transportation based on calculations for VMT per capita and VT per capita. The analysis used the City of Pasadena Travel Demand Forecasting (TDF) Model, which was validated to 2013 traffic conditions and later updated to reflect 2017 conditions. Both the 2013 and 2017 models assumed that the I-710 extension would be construction by 2035, which is no longer a valid assumption. As such, an assessment was conducted to update the model to reflect the 2035 horizon year without the I-710 extension.⁸ This assessment concluded that there were no substantial deviations from the VMT and VT analyses with the removal of the I-710 from the model. Thus, both versions of the Pasadena TDF Model are consistent with the changes to the CEQA metrics establishing VMT as the measurement of traffic impacts. The VMT analysis previously prepared for the GP EIR would also be applicable to the proposed project. Further, it should be noted that there is no specific development project identified by the project. Rather, potential future developments within the project site consisting of 50 or more dwelling units and non-residential development projects greater than 50,000 square feet in size would be required to include a VMT assessment as part the environmental documentation prepared for that specific project. Moreover, the combination of the pedestrian accessibility of the Fuller campus and access to quality transit and bicycle facilities, as discussed above, result in low VMT in the area and reduced vehicle trip generation. As such, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and the impact would be less than significant.

⁸ Pasadena Future Year Travel Demand Forecasting Model Update and New VMT/VT Metrics Memorandum, Fehr & Peers, October 2020.

	lssues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
XV	III. UTILITIES AND SERVICE SY Would the project:	STEMS					
a)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	LTS	LTS	No	No	No	No
b)	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	LTS	LTS	No	No	No	No
c)	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	LTS	LTS	No	No	No	No
d)	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	LTS	LTS	No	No	No	No

	ssues and Supporting Data Sources:	GP EIR Impact Conclusion	Proposed Project Impact Conclusion	New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the Proposed Project?
e)	Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	LTS	LTS	No	No	No	No
f)	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	LTS	LTS	No	No	No	No
g)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	NI (IS)	NI	No	No	No	No

The GP EIR found that regarding wastewater treatment and collection, services provided by the Sanitation Districts of Los Angeles County, Los Angeles County Public Works Department, and Pasadena Water and Power would adequately manage wastewater generated by buildout of the General Plan Update. Upon implementation of regulatory requirements and standard conditions of approval, such as payment of development fees and implementation of a site-specific Storm Water Pollution Prevention Plan for construction, impacts on stormwater drainage facilities would be less than significant. Regarding water supply and distribution, the GP EIR found that buildout of the General Plan Update would fall within projections for Pasadena Water and Power's capacity; project requirements would be met by current services provided by Pasadena Water and Power. Upon implementation of regulatory requirements and standard conditions of approval, such as implementation of mandatory conservation measures, requiring the preparation of a Water Supply Assessment for development projects meeting certain size criteria, and requiring affirmative verification of sufficient water supply for certain residential subdivisions pursuant to SB 221, the impact would be less than significant. Regarding

solid waste, the GP EIR found that buildout of the General Plan Update would be accommodated by existing service providers and facilities. Upon implementation of regulatory requirements and standard conditions of approval, such as the inclusion of storage areas for recyclable materials at future nonresidential and multi-family residential development projects pursuant to AB 341, recycling at least 50 percent of construction and demolition waste pursuant to the California Green Building Code, and solid waste reduction strategies under General Plan Policies 10.2 and 10.4, the impact would be less than significant. Regarding other utilities, including electricity, natural gas, and telecommunications, the GP EIR concluded that future development under the General Plan Update would be accommodated by existing service providers, and the impact would be less than significant. The GP EIR found that the General Plan Update would be accommodated by existing service providers, and the impact would be less than significant. The GP EIR found that the General Plan Update would be accommodated by existing service providers, and the impact would be less than significant. The GP EIR found that the General Plan Update would be accommodated by existing service providers, and the impact would be less than significant. The GP EIR found that the General Plan Update satisfied and complied with the City's adopted General Plan Open Space and Conservation Element pertaining to water conservation, General Plan Safety Element pertaining to continued earthquake strengthening for utilities and protection of water supply, and state codes and regulations pertaining to utility services, and that the proposed updates to the General Plan Land Use Element regarding energy and water efficiency and conservation and solid waste reduction would create more sustainable standards for the future of the City. The IS prepared for the GP EIR found that buildout of the General Plan Update would be required to comply with all applicable solid waste regulatio

As described previously, no development is proposed as part of the project. While the project would include amending the General Plan Land Use designation from Institutional to Medium Mixed-Use Residential and changing the zoning from Public-Semi Public (PS) to Central District Residential Multi-Family (CD-RM-87) at 260 North Oakland Avenue, such changes would align with the existing and surrounding residential uses of that parcel. Accordingly, the parcel located at 260 North Oakland, which currently consists of 10 multi-family units, would be permitted a density of up to 87 dwelling units per acre should a future residential project be proposed at that location. Based on the size of the approximately 0.41-acre parcel, up to 36 dwelling units could be developed, which would result in a nominal increase in the demand for water, wastewater, and solid waste services. Under the project, all other excluded parcels would remain subject to the land use designations identified in the General Plan Land Use diagram and would be subject to the development standards of the underlying zoning, which include the CD-RM-87 and CD-MU-N zones. Furthermore, as discussed above, the project would support the City's need to provide additional housing and would, in part, implement elements of the City's 2021-2029 Housing Element (2021-2029). The City has transmitted the Housing Element to Pasadena Water and Power Department, Pasadena Public Works Department, and the Los Angeles County Sanitation District to allow for population projections to be incorporated into their plans accordingly. Moreover, the project site is urbanized and any potential future development would be anticipated to require connections to existing mainlines and/or laterals in coordination with utility service providers, similar to what occurs under existing conditions. Therefore, the project is not anticipated to result in an exceedance of the capacity of existing utility facilities, and no new or expanded facilities are anticipated to be needed to service the zones identified by the proposed project. Similar to the General Plan Update, any potential future developments implemented under the proposed project would also be required to adhere to all applicable solid waste regulations. Therefore, implementation of the project would have no impact related to compliance with solid waste regulations.

The current CEQA Guidelines Appendix G checklist also includes assessment criteria for potential impacts related to the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities. Similar to water, wastewater, and solid

waste facilities, existing service providers would manage electricity, natural gas, and telecommunications services for any potential future developments in the project site. As discussed, the project site is primarily built out under existing conditions. Thus, it is anticipated that any new development would require lateral connections to mainlines in coordination with utility service providers, similar to what occurs under existing conditions. Therefore, the project would result in less than significant impacts related to the relocation or construction of new or expanded electric power, natural gas, and telecommunications facilities.

Environmental Determination

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

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

Prepared By	Date	Reviewed By	Date
Printed Name		Printed Name	
Addendum approved on	1:		
Approval attested to by:	Signature	Date	
	Printed Name		

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CHAPTER 4 MITIGATION MEASURES

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

Air Quality

- 2-1 Prior to issuance of any construction permits, development project applicants shall prepare and submit to the City of Pasadena Planning Division a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City of Pasadena Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Division. Mitigation measures to reduce construction-related emissions include, but are not limited to:
 - Requiring fugitive-dust control measures that exceed SCAQMD's Rule 403, such as:
 - Use of nontoxic soil stabilizers to reduce wind erosion.
 - Applying water every four hours to active soil-disturbing activities.
 - Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
 - Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower.
 - Ensuring that construction equipment is properly serviced and maintained to the manufacturer's standards.
 - Limiting nonessential idling of construction equipment to no more than five consecutive minutes.
 - Using Super-Compliant volatile organic compound (VOC) paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the SCAQMD's website at http://www.aqmd.gov/prdas/brochures/Super-Compliant_AIM.pdf.

- **2-2** Prior to future discretionary project approval, development project applicants shall prepare and submit to the City of Pasadena Planning Division a technical assessment evaluating potential project operation phase-related air quality impacts. The evaluation shall be prepared in conformance with SCAQMD methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City of Pasadena Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the Standard Conditions of Approval. Below are possible mitigation measures to reduce long-term emissions:
 - Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 California Code of Regulations Chapter 10 § 2485).
 - Site-specific development shall demonstrate that an adequate number of electrical vehicle Level 2 charging stations are provided onsite. The location of the electrical outlets shall be specified on building plans, and proper installation shall be verified by the Building Division prior to issuance of a Certificate of Occupancy.
 - Applicant-provided appliances shall be Energy Star appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star appliances shall be verified by the Building & Safety Division during plan check.
 - Applicants for future development projects along existing and planned transit routes shall coordinate with the City of Pasadena, Metro, and Foothill Transit to ensure that bus pads and shelters are incorporated, as appropriate.

Cultural Resources

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

Greenhouse Gas Emissions

5-1 Within approximately 18 months of adoption of the proposed General Plan Update, the City of Pasadena shall prepare and present to the City Council for adoption a community climate action plan/greenhouse gas reduction plan. The Plan shall identify strategies to be implemented to reduce GHG emissions associated with the City and shall include as one alternative a program that achieves the AB 32 targets. In addition, the City shall monitor GHG emissions by updating its community-wide GHG emissions inventory every five years upon adoption of the initial Plan. Upon the next update to the community climate

action plan/greenhouse gas reduction plan, the inventory, GHG reduction measures, and GHG reductions shall be forecast to year 2035 to ensure progress toward achieving the interim target that aligns with the long-term GHG reduction goals of Executive Order S-03-04. The Plan update shall take into account the reductions achievable from federal and state actions and measures as well as ongoing work by the City and the private sector. The 2035 Plan update shall be completed by January 1, 2021, with a plan to achieve GHG reductions for 2035 or 2040, provided the state has an actual plan to achieve reductions for 2035 or 2040. New reduction programs in similar sectors as the proposed Plan (building energy, transportation, waste, water, wastewater, agriculture, and others) will likely be necessary. Future targets shall be considered in alignment with state reduction targets, to the maximum extent feasible, but it is premature at this time to determine whether or not such targets can be feasibly met through the combination of federal, state, and local action given technical, logistical and financial constraints. Future updates to the community climate action plan/greenhouse gas reduction plan shall account for the horizon beyond 2035 as the state adopts actual plans to meet post-2035 targets. In all instances, the community climate action plan/greenhouse gas reduction plan and any updates shall be consistent with state and federal law.

<u>Noise</u>

- **9-1** Prior to issuance of building and occupancy permits, applicants of industrial projects that involve vibration-intensive machinery or activities adjacent to sensitive receptors shall prepare a study to evaluate potential vibration impacts. The study shall prepared by an acoustical engineer and be submitted to the City of Pasadena Planning Division. The study shall evaluate the vibration levels associated with operation of project-related equipment and activities experienced by nearby sensitive receptors. If it is determined that vibration impacts to nearby receptors exceed the Federal Transit Administration (FTA) vibration-annoyance criterion, the study shall recommend and the applicant shall implement the identified measures with the purpose of reducing vibration impacts to a less than significant level. The City of Pasadena shall verify implementation of all identified measures.
- **9-2** Prior to issuance of building permits for the new construction of habitable area, applicants for development projects shall adhere to the appropriate Vibration Category 2 and Vibration Category 3 screening distances for light rail transit as recommended in Table 9-2 of FTA's Transit Noise and Vibration Impact Assessment (FTA 2006) in evaluating vibration impacts related to trains on the Metro Gold Line. Applicants for development projects that fall within the screening distances shall prepare and submit to the City of Pasadena Planning Division a study evaluating vibration impacts to the proposed development from train operations. The study shall be prepared by an acoustical engineer who shall identify measures to reduce impacts to habitable structures to below the FTA vibration annoyance criterion. The identified measures shall be incorporated into all design plans submitted to the City of Pasadena.
- **9-3** Prior to issuance of any grading and construction permits, applicants for individual projects that involve vibration-intensive construction activities, such as pile drivers, jack hammers, and vibratory rollers, within 25 feet of sensitive receptors (e.g., residences and historic structures) shall prepare and submit to the City of Pasadena Planning Division a study to evaluate potential construction-related vibration impacts. The study shall be prepared by an acoustical engineer and shall identify measures to reduce impacts to habitable structures to below the FTA vibration annoyance criterion. If construction-related vibration

is determined to be perceptible at vibration-sensitive uses, additional requirements, such as use of less-vibration-intensive equipment or construction technique, shall be implemented during construction (e.g., drilled piles, static rollers, and nonexplosive rock blasting). Identified measures shall be included on all construction and building documents and submitted for verification to the City of Pasadena Planning Division.

- 9-4 Prior to issuance of any construction permits, applicants for individual projects that involve vibration-intensive construction activities, such as pile drivers, jack hammers, bulldozers, and vibratory rollers, within 25 feet of sensitive receptors (e.g., residences) or 50 feet of historic structures, shall prepare and submit to the City of Pasadena Planning Division a study to evaluate potential construction-related vibration impacts. The vibration assessment shall be prepared by an acoustical engineer and be based on the FTA vibration-induced architectural damage criterion. If the study determines a potential exceedance of the FTA thresholds, measures shall be identified that ensure vibration levels are reduced to below the thresholds. Measures to reduce vibration levels can include use of less-vibration-intensive equipment (e.g., drilled piles and static rollers) and/or construction techniques (e.g., nonexplosive rock blasting and use of hand tools) and preparation of a preconstruction survey report to assess the condition of the affected sensitive structure. Notwithstanding the above, pile drivers shall not be allowed within 150 feet of any historic structures. Identified measures shall be included on all construction and building documents and submitted for verification to the City of Pasadena Planning Division.
- **9-5** Prior to issuance of construction permits, applicants for new development projects within 500 feet of noise-sensitive receptors shall implement the following best management practices to reduce construction noise levels:
 - Consider the installation of temporary sound barriers for construction activities immediately adjacent to occupied noise-sensitive structures.
 - Equip construction equipment with mufflers.
 - Restrict haul routes and construction-related traffic.
 - Reduce nonessential idling of construction equipment to no more than five minutes.

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

Transportation and Traffic

13-1 The City of Pasadena shall update its existing transportation impact fee program by 2020. The City shall prepare a "Nexus" Study that will serve as the basis for requiring development impact fees under AB 1600 legislation, as codified by California Code Government Section 66000 et seq. The established procedures under AB 1600 require that a "reasonable relationship" or nexus exist between the traffic improvements and facilities required to mitigate the traffic impacts of new development pursuant to the proposed project. After approval of the Nexus Study, the City shall update the transportation impact fee program to fund all citywide circulation improvements, including the pedestrian and bicycle network. The fee program shall stipulate that fees are assessed

when there is new construction or when there is an increase in square footage within an existing building or the conversion of existing square footage to a more intensive use. Fees are calculated by multiplying the proposed square footage or dwelling unit by the rate identified. The fees are included with any other applicable fees payable at the time the building permit is issued. The City will use the development fees to fund construction (or to recoup fees advanced to fund construction).

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CHAPTER 5 LIST OF PREPARERS

LEAD AGENCY

The City of Pasadena Planning & Community Development Department 175 N. Garfield Avenue Pasadena, CA 91101

Martin Potter, Principal Planner Melanie Hall, Planner

PREPARED BY

Michael Baker International 3760 Kilroy Airport Way, Suite 270 Long Beach, California 90806

John Bellas, Project Director Cristina Lowery, Project Manager Frankie Tong, Environmental Analyst Jeanette Cappiello, Graphics Specialist Page Intentionally Left Blank