

Attachment A

Categorical Exemption Determination for Brookside Park Project Executive Summary

Project Description

The Brookside Park Stormwater Capture Project is located within Brookside Park Parking Lot I at 360 North Arroyo Boulevard in the City of Pasadena (City), California. The Project consists primarily of the rehabilitation, resurfacing, restriping, and restoration of the existing public parking facility, together with installation of ancillary stormwater treatment, infiltration, groundwater recharge, landscaping, and related utility improvements within the existing developed footprint of the parking lot.

The Project would reconstruct and rehabilitate deteriorated asphalt pavement, restore parking lot surfaces disturbed during construction, restripe parking stalls and circulation areas, improve drainage functionality, and replace landscape and parking lot features as necessary to maintain and enhance long-term operation of the facility. Associated improvements include installation of a subsurface stormwater capture and infiltration gallery, diversion structures connected to the existing Seco Street Drain, pretreatment and filtration systems, monitoring facilities, bioretention areas, permeable pavement strips, replacement landscaping, and related appurtenant infrastructure.

The Project is designed to improve stormwater quality, increase groundwater recharge, enhance infrastructure resiliency, and support long-term sustainability objectives while maintaining the existing parking, recreational, and circulation functions of Brookside Park. Following construction, the parking lot would continue to function as an existing public parking facility with substantially the same operational characteristics and use. A Historic Built Environment Impacts Assessment was prepared in support of the Project.¹

Construction of the proposed Project is anticipated to occur over approximately 18 months, beginning in Q1 of 2029 and concluding in Q4 of 2030. The City has noted that March through May is typically the slowest use of Parking Lot I, and as such will be prioritized for critical construction elements. After construction is completed, routine maintenance will occur annually, as discussed in the Project-specific operations and maintenance plan (O&M) plan.

CEQA Exemption Determination

The City has determined that the Project qualifies for categorical exemptions pursuant to CEQA Guidelines Sections 15301 (Class 1 – Existing Facilities),

1. South Environmental. Historic Built Environment Impacts Assessment for the Brookside Park Stormwater Capture Project, May 2026. The report is available for public review on the Project website at bit.ly/BrooksideParkProject.

15302 (Class 2 – Replacement or Reconstruction), 15303 (Class 3 – Small Structures), 15304 (Class 4-Minor Alterations), and 15332 (Class 32-Infill Development).

Class 1 – Existing Facilities (CEQA Guidelines §Section 15301)

The Project is located entirely within an existing developed parking lot and associated public infrastructure facilities. Project improvements include both above-ground and below-ground modifications within the existing developed site. Above-ground improvements consist of resurfacing, rehabilitation, and restriping of the existing parking lot; replacement of disturbed pavement; restoration of circulation patterns; replacement landscaping; and installation of green infrastructure features integrated into the existing site. Below-ground improvements consist of minor alterations and modifications to the existing storm drainage infrastructure, including installation of stormwater capture and conveyance facilities, connections to existing drainage facilities, and related utility improvements within previously disturbed areas. The Project does not expand the existing parking lot footprint, roadway network, park facilities, drainage service area, or public use of the site, nor does it increase the capacity or intensity of use of the existing storm drainage system. Accordingly, the Project constitutes the operation, repair, maintenance, permitting, leasing, licensing, and minor alteration of existing public facilities involving negligible or no expansion of existing or former use and therefore qualifies for a Class 1 Categorical Exemption pursuant to CEQA Guidelines Section 15301.

Class 2 – Replacement or Reconstruction (CEQA Guidelines §Section 15302)

The Project includes reconstruction of impacted portions of the existing parking lot pavement section, replacement of parking lot surfaces, reconstruction of drainage-related infrastructure, replacement of landscaping disturbed during construction, and connecting into the existing Seco Street Drain below grade. Existing paved areas would be restored and restriped following installation of the subsurface facilities. The reconstructed parking lot would continue serving the same parking and circulation functions and would maintain substantially the same operational capacity as the existing facility. Accordingly, the Project qualifies as replacement and reconstruction of existing public infrastructure and site improvements serving substantially the same purpose and capacity.

Class 3 – Small Structures (CEQA Guidelines §Section 15303)

The Project includes installation of ancillary stormwater management facilities including diversion structures, pretreatment vaults, filtration systems, infiltration gallery, monitoring manholes, flow metering equipment, bioretention facilities, permeable pavement features, and related utility infrastructure. The Project also

installs a new 30-inch RCP to provide a minor utility extension connecting the existing Seco Street Storm Drain to the new infiltration gallery. These components are accessory improvements serving an existing public facility and are of limited size and scale consistent with CEQA Guidelines Section 15303.

Class 4 – Minor Alterations to Land (CEQA Guidelines § 15304)

The Project includes minor alterations to the condition of land within an existing developed parking lot and landscaped areas of Brookside Park. Improvements include installation of bioretention facilities, permeable pavement features, replacement landscaping, grading associated with stormwater management improvements, and construction of subsurface infiltration facilities within previously disturbed areas. After installation of underground subsurface concrete galleries, the surface pavement will be restored. The Project does not result in the expansion of existing land uses, recreational uses, parking operations, or public facilities.

The Project requires removal of nine existing trees to accommodate construction of the subsurface infiltration gallery. Based on the project arborist's assessment, the trees have diameters at breast height (DBH) ranging from approximately 8 to 13 inches. Pursuant to Pasadena Municipal Code Chapter 8.52, a mature tree is defined as having a DBH of 19 inches or greater. Accordingly, the trees proposed for removal do not meet the City's definition of mature trees. Additionally, the trees have not reached the maximum height or canopy spread typical for their species. The trees proposed for removal are primarily California sycamores, a species that can exceed 70 feet in height at maturity. The subject trees are approximately 30 feet in height and have not reached the size or canopy development generally associated with mature specimens. In addition, the trees are located within an existing developed parking lot and are not identified as scenic resources or as possessing unique scenic value. The City reviewed the proposed removals through the Urban Forestry Advisory Committee approval process and determined that the removals do not involve healthy, mature, scenic trees as contemplated by CEQA Guidelines Section 15304.

Accordingly, the Project constitutes a minor alteration to the condition of land and qualifies for a Class 4 Categorical Exemption pursuant to CEQA Guidelines Section 15304.

Class 32 – In-Fill Development Projects (CEQA Guidelines § 15332)

The Project qualifies as an In-Fill Development Project pursuant to CEQA Guidelines Section 15332. The Project site is located within the City of Pasadena on a previously developed and urbanized site less than 5 acres, consisting of an existing public parking lot. The Project consists of the applicable General Plan designation, zoning regulations, and policies governing the site because it maintains the existing parking, circulation, and public infrastructure functions of

parking Lot I, while enhancing stormwater management and groundwater recharge capabilities.

The Project site is entirely developed (mostly surface parking lot) with the only vegetation onsite being ornamental landscaping. The site has no value as habitat for endangered, rare, or threatened species. The Project is located on a site that is substantially surrounded by urban uses, including developed park facilities, public roadways, parking facilities, and municipal infrastructure. Construction activities would occur primarily within an existing developed parking lot. The Project would not result in any significant effects relating to traffic, noise, air quality, or water quality. To the contrary, the Project is designed to improve stormwater quality, reduce pollutant loading to receiving waters, increase groundwater recharge, and enhance long-term environmental sustainability.

The Project site can be adequately served by all required utilities and public services because it is located within an existing developed public facility that is already served by municipal infrastructure, including roadway access, storm drainage facilities, water, sewer, and other public services. The Project does not induce population growth, expand development capacity, or intensify land use beyond existing conditions.

Accordingly, the Project satisfies the criteria set forth in CEQA Guidelines Section 15332 and qualifies for a Class 32 Categorical Exemption.

Historic Resources and Arroyo Seco Context

The Project site is located within the Pasadena Arroyo Parks and Recreation District, which is listed in the National Register of Historic Places. Parking Lot I, where the Project is located, is identified as a non-contributing feature within the historic district. The Project preserves the existing recreational use of the site, maintains existing circulation patterns, and occurs largely beneath an existing developed parking lot. Improvements are compatible with the Arroyo Seco Design Guidelines and surrounding historic context. The Project would not result in an adverse change in the significance of the Pasadena Arroyo Parks and Recreation District.

Exceptions to the Categorical Exemptions

Pursuant to CEQA Guidelines Section 15300.2, none of the exceptions to the use of a categorical exemption apply. The Project is located within a previously disturbed and developed parking lot and does not result in expansion of existing land uses, roadway capacity, park facilities, or public services. Technical studies prepared for the Project, including historic resource evaluations and environmental review conducted during project development, support the City's determination that no unusual circumstances or other exceptions identified in CEQA Guidelines Section 15300.2 are present.

Conclusion

The Brookside Park Stormwater Capture Project consists primarily of rehabilitation, resurfacing, restriping, and reconstruction of an existing public parking facility together with installation of stormwater capture, treatment, infiltration, groundwater recharge, landscaping, and related utility improvements. The Project maintains the existing function and use of the site while improving water quality, groundwater recharge, infrastructure resiliency, and sustainability objectives. The Project is located within a previously developed and urbanized area, is consistent with applicable land use regulations, is adequately served by existing public services and utilities, and does not result in significant environmental effects. Accordingly, the Project qualifies for categorical exemptions under CEQA Guidelines Sections 15301 (Existing Facilities), 15302 (Replacement or Reconstruction), 15303 (New Construction or Conversion of Small Structures), 15304 (Minor Alterations to Land), and 15332 (In-Fill Development Projects).